

# Murphy's Yard, Kentish Town

Local Planning Authority: Camden

Local Planning Authority reference: 2021/3225/P

**Strategic planning application stage 1 referral**

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

**The proposal**

Outline planning permission, with all matters reserved, for the phased redevelopment of the site by the demolition of existing buildings and erection of buildings across 18 development plots ranging in height from 1 to 19 storeys to provide 750-825 residential units; specialist housing; industrial, office, community, healthcare, commercial, flexible commercial and sui generis floorspace; with associated cycle and vehicle parking, refuse and recycling storage, plant, highway and access improvements, amenity space, landscape and public realm improvements including new pedestrian and cycle routes.

**The applicant**

The applicant is **Folgate Estates** and the architect is **Studio Egret West**.

**Strategic issues summary**

**Land use principles:** In view of the plan-led approach being employed by the Council with regard to the introduction of residential and other non-industrial uses on this designated Locally Significant Industrial Site, the principle of an employment-led mixed used scheme is considered acceptable in line with Policies E4, E6, E7, H1 and S1 and Objectives GG1 and GG2 of the London Plan (paragraphs 20-34).

**Affordable housing:** The scheme is proposing 35% affordable housing by habitable room, with 60% LAR and 40% Intermediate rent; however, as the site is partially public land, the scheme does not qualify for the Fast Track Route. Early, mid and late stage reviews are required. (paragraphs 38-44).

**Heritage and Urban design:** Any harm to heritage assets would be less than substantial harm and this harm would be outweighed by the scheme's public benefits; further information and clarifications (including the imposition of planning conditions) are required to conclude the assessment of the proposal against Policy D9C (paragraphs 45-78).

**Sustainable development and Environmental issues:** Further information is required on the energy strategy, WLC assessment and circular economy. Compliance with London Plan water efficiency, digital connectivity and SUDs requirements should be secured (paragraphs 79-88).

**Transport:** Further consideration of appropriate funding sources for the proposed 'Heath Line' and 'Makers Lane' routes is encouraged; access arrangements proposed at Sanderson Road and Greenwood Place should be safety audited; and various transport-related plans, financial contributions, an infrastructure protection agreement and EVCPs should be secured via conditions or planning obligations as appropriate (paragraphs 89-106).

**Recommendation**

That Camden Council be advised that the application does not yet comply with the London Plan for the reasons set out in paragraph 110. Possible remedies set out in this report could address these deficiencies.

## Context

1. On 5 January 2022 the Mayor of London received documents from Camden Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.
2. The application is referable under the following Categories of the Schedule to the Order 2008:
  - **Category 1A:** *'Development which comprises or includes the provision of more than 150 houses, flats or houses and flats'*.
  - **Category 1B:** *'Development (other than development which only comprises the provision of houses, flats or houses and flats) which comprises or includes the erection of a building or buildings outside Central London and with a total floorspace of more than 15,000 square metres'*.
  - **Category 1C:** *'Development which comprises or includes the erection of a building of (c) more than 30 metres high and is outside the City of London.'*
3. Once Camden Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or, allow the Council to determine it itself.
4. The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 has been taken into account in the consideration of this case.
5. The Mayor of London's statement on this case will be made available on the GLA's public register: <https://planning.london.gov.uk/pr/s/>

## Site description

6. The application site is approximately 6.23 hectares. A Locally Significant Industrial Site (LSIS), it is situated in Kentish Town and falls within the northern part of the Kentish Town Planning Framework (KTPF), which was adopted in July 2020. It is allocated within the Council's Draft Site Allocations Local Plan document for a 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.
7. The site is bounded by railway lines to the south, west and north and by the rear of buildings to the east with Highgate Road beyond. Running from Kentish Town in the south (with Gospel Oak and Hampstead Heath to the north) the site is not publicly accessible at the moment. It is partially owned and occupied

by J Murphy and Sons, which is a construction company whose head office is located on-site. Network Rail also owns approximately 1.89 hectares of the site. Various smaller industrial units/storage space/yard space are also currently located on the site, which has significant level changes.

8. The surrounding land uses are varied but are predominantly non- residential. To the south of the site, beyond the railway lines, lies the Regis Road industrial site; to the east lie various land uses fronting Highgate Road including, Highgate Studios, the Forum music venue and various retail/restaurant uses; to the north lies Gospel Oak and the Heath; and to the west, beyond the railway lines, lies a residential estate.
9. There are no statutory listed buildings on the site; however, Shed 2 and Shed 3 located on the site are of historic interest and locally listed. The nearest statutory listed buildings are the Grade II 1, 1A, 2 and 3 Wesleyan Place; Southampton House on Highgate Street; Parliament Hill Fields Lido; 68 & 70 and 1-7 Highgate Road; Christ Apostolic Church; Bull and Gate Public House; and The Forum. Although not within a conservation area, the site is near to Dartmouth Park and Mansfield Conservation Areas.
10. Part of the site along its south-east is within the Protected Vista 3A - Kenwood viewing gazebo to St Paul's Cathedral. Additionally, the local views of Parliament Hill from Kentish Town Station, a 'Protected Corridor' and 'Peripheral Corridor' under the Kentish Town Neighbourhood Plan, cross the middle of the site.
11. The nearest part of the Strategic Road Network (SRN) is Fortress Road (A400), about 50 metres to the east. There is no Transport for London Road Network (TLRN) within or close to the site.
12. The site is within walking distance of Gospel Oak Station, served by both the Clapham Junction and Stratford and Gospel Oak to Barking branches of the London Overground. Also within walking distance is the Kentish Town Station (that is served by the London Underground (LU) Northern Line and National Rail Thameslink services) and bus services C11, 214, 134, 393 and 88. The public transport access level (PTAL) of the site therefore currently ranges from 2 to 5 on a scale of 0-6b where 6b is considered excellent.
13. The nearest strategic cycle route is Cycleway 9 along the A5202 Royal College Street, 800m south. This route is fully segregated from the footway and carriageway.

## **Details of this proposal**

14. The applicant is seeking outline planning permission for the redevelopment of the site, involving the erection of a series of buildings across Plots A-C, F-M, O-P, Q and S, and 2 sheds ranging in height from a single storey to 19 storeys. The scheme would comprise the uses (maximum and minimum floorspace) set out in Table 1 below, in addition to cycle and vehicle parking, refuse and recycling storage, plant, highway and access improvements, amenity space,

landscape and public realm improvements including new pedestrian and cycle routes.

Table 1: Proposed uses

Land Use	Minimum	Maximum
Residential (C3)	750 homes	825 homes
Residential (C3) floorspace	-	78,410 (excluding ancillary areas) <sup>1</sup> 85,200 (including ancillary areas) <sup>1</sup>
Residential institution (C2)	-	8,000
Office (E(g)(i))	-	34,500
General Industrial and/or Storage and Distribution (B2 and/or B8)	40,461 <sup>2</sup>	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 <sup>3</sup>	-	16,000
Retail and/or commercial (E(a) and/or E(b) and/or E(d) and/or E(f) and/or sui generis <sup>4</sup> )	700	3,650
Flexible mixed-use space <sup>5</sup>	1,300	1,500
Community (F1 and/or F2)	300	1,300
<b>Minimum floorspace (excluding residential C3)</b>		<b>42,761 sqm</b>
<b>Non-residential cap</b>		<b>95,000 sqm<sup>6</sup></b>
<sup>1</sup> Ancillary areas include car park, plant, BOH, refuse and bike store.		
<sup>2</sup> 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).		
<sup>3</sup> 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.		
<sup>4</sup> 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.		
<sup>5</sup> 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.		
<sup>6</sup> The total non-residential development must not exceed 95,000 sqm. This area is inclusive of plant, car parking, and other ancillary spaces.		

## Case history

- GLA officers provided pre-application advice on this scheme on 10 July 2019 and 30 July 2020. Across both meetings, the following strategic issues were covered: principle of development, affordable housing, energy and transport. Although not discussed, guidance was provided in the advice note on flood risk, sustainable drainage, water efficiency, circular economy and urban greening. The pre-application advice notes issued by the GLA indicated that the principle

of an employment-led development would be supported. However, issues raised over the course of the two pre-application meetings relating to urban design, housing and affordable housing, affordability, transport, sustainable development, inclusive access and children’s playspace had to be addressed.

### **Strategic planning issues and relevant policies and guidance**

16. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the Camden Local Plan (2017), Site Allocations Plan (2013), the Kentish Town Neighbourhood Plan (2016) and, the London Plan 2021.

17. The following are also relevant material considerations:

- The National Planning Policy Framework and National Planning Practice Guidance;
- National Design Guide;
- National Model Design Code;
- Kentish Town Planning Framework (2020); and,
- Camden Draft Site Allocations Local Plan (2020);

18. The relevant issues, corresponding strategic policies and guidance (supplementary planning guidance (SPG) and London Plan guidance (LPG)), are as follows:

- |                           |  |
|---------------------------|--|
| • Good growth             | <i>London Plan;</i>  |
| • Housing                 | <i>London Plan; Housing SPG; the Mayor’s Housing Strategy; Play and Informal Recreation SPG; Character and Context SPG; Housing Design Standards draft LPG;</i>  |
| • Affordable housing      | <i>London Plan; Housing SPG; Affordable Housing and Viability SPG; the Mayor’s Housing Strategy;</i>   |
| • Industrial land         | <i>London Plan;</i>  |
| • Social infrastructure   | <i>London Plan; Social Infrastructure SPG;</i>   |
| • Heritage                | <i>London Plan;</i>  |
| • Strategic views         | <i>London Plan, London View Management Framework SPG;</i>  |
| • Urban design            | <i>London Plan; Character and Context SPG; Public London Charter LPG; Housing SPG; Play and Informal Recreation SPG; Housing Design Standards LPG; Optimising Site Capacity: A Design-led Approach draft LPG; Fire Safety draft LPG;</i> |
| • Inclusive access        | <i>London Plan; Accessible London: achieving an inclusive environment SPG; Public London Charter LPG;</i>  |
| • Sustainable development | <i>London Plan; Circular Economy Statements draft LPG; Whole-life Carbon Assessments draft LPG; ‘Be Seen’</i>  |

- Transport and parking *Energy Monitoring Guidance LPG; Urban Greening Factor draft LPG; London Environment Strategy; London Plan; the Mayor's Transport Strategy; Sustainable Transport, Walking and Cycling draft LPG.*
- Air quality *London Plan; the Mayor's Environment Strategy; Control of dust and emissions during construction and demolition SPG; Air Quality Neutral draft LPG; Air Quality Positive draft LPG;*
- Ambient noise *London Plan; London Environment Strategy;*
- Biodiversity *London Plan; London Environment Strategy.*

19. On 24 May 2021 a Written Ministerial Statement (WMS) was published in relation to First Homes. To the extent that it is relevant to this particular application, the WMS has been taken into account by the Mayor as a material consideration when considering this report and the officer's recommendation. Further information on the WMS and guidance in relation to how the GLA expect local planning authorities to take the WMS into account in decision making can be found [here](#).

### **Land use principles**

20. Good Growth Objective GG2 of the London Plan promotes the optimisation of land, particularly through the redevelopment of brownfield sites, as a key part of the strategy for delivering additional homes in London.

#### Re-provision of industrial capacity

21. The application site is designated as a Locally Significant Industrial Site (LSIS). London Plan Policy E4 makes clear that enough stock of land and premises should be available to meet current and future needs for industrial uses in various parts of London. Policy E4 further sets out that any release of industrial land should facilitate industrial intensification, co-location and land substitution processes and makes clear that any release that accords with this approach should be in locations that have high public transport accessibility and aid in delivering other planning priorities, particularly affordable housing.
22. London Plan Policies E6 and E7 recognise that there may be potential within LSIS for industrial intensification and co-location with residential and other land uses, subject to compliance with the criteria set out in Policy E7. This criteria includes ensuring adjacent industrial activities are not compromised and appropriate design mitigation measures are secured in line with the Agent of Change principle set out in London Plan Policy D13. Policy E7 also emphasises the need for a plan or masterplan-led approach to intensification and co-location and the application site falls within the boundaries of the adopted Kentish Town Planning Framework (KTPF). It also forms part of KT3 – Murphy's Site, in the Camden draft Site Allocations Local Plan, which is earmarked for residential development, employment/industrial uses, community infrastructure and open spaces. Table 2 below sets out the existing quantum of industrial floorspace (use classes E(g)(iii), B2 and B8) on the site by building.

Table 2: Existing industrial floorspace

Existing building	Floorspace (GIA)	Floorspace (GEA)
Shed 2	4,733	5,002
Shed 3	6,176	6,696
Workshops + offices	3,838	3,959
Building Q	2,649	2,748
Thames Water	727	735
Training Centre	105	140
Security Gate	74	92
<b>Total</b>	<b>18,302</b>	<b>19,372</b>

23. The site currently contains 19,372 sq.m. (GEA) of industrial floorspace and the scheme is proposing 40,461 sq.m. comprising 4,418 sq.m. of general industrial, storage or distribution [B2/B8], 14,955 sq.m. of light industry [E(g)iii] and 21,088 sq.m. of either B2/B8, E(g)iii or E(g)ii subject to the individual caps on each of these uses. This represents a net increase of 21,809 sq.m., which equates to uplift of approximately 108% on floorspace and is approximately 65% of the plot ratio.
24. It should be noted that for the purposes of London Plan Policy E4A(10), industrial uses within use class E(g)ii must be for the research and development of industrial and related products or processes. This should be appropriately secured. Nonetheless, the proposed amount of industrial floorspace is supported in line with London Plan Policies E4, E6 and E7.

#### Housing delivery

25. Policy H1 of the London Plan, in seeking to increase the supply of housing in London, sets borough housing targets and allocates to the London Borough of Camden a target of 10,380 for the period 2019/20 to 2028/29. The scheme proposes between 750-825 new residential units; this is strongly supported. In addition to self-contained homes, the proposal also includes 8,000 sq.m. of non-self-contained accommodation within use class C2 and Policy H1 recognises such units as contributing to meeting London's housing targets. This is also supported.

#### Social infrastructure – health and community use

26. Objective GG1 emphasises the need for access to good quality community spaces, services, amenities and infrastructure that engender active participation and social integration and tackle social isolation.
27. Policy S2 of the London Plan emphasises the importance of boroughs working with Clinical Commissioning Groups (CCGs) and other NHS and community organisations to ensure the efficient delivery of health infrastructure that facilitates the efficient delivery of health and social care, which meets current and future demand. The proposal includes a maximum of 16,000 sq.m. of floorspace for a health facility and it is understood that the applicant has been engaging with the National Health Service (NHS) and the North Central London

CCG. The provision of a healthcare facility is supported, subject to demonstrable support from Clinical Commissioning Groups (CCGs) or other NHS and community organisations. The need for this as a prerequisite to the construction of any health facility should be secured in the Section 106.

28. Similarly, the provision of community use floorspace is supported in line with London Plan Policy S1 and Good Growth Objective GG1. The submission of a management plan setting out public access, costs etc at reserved matters stage should be secured in the Section 106 agreement.

#### Town centre uses – office, leisure and retail

29. The London Plan adopts a strong town centres first approach to development and Policy SD7 reinforces this stance by discouraging the development of town centres uses in of out-of-centre locations, unless it is demonstrated that no suitable town centre or edge-of-centre site is available or expected to become available. This should be demonstrated through a sequential test, as well as an impact assessment where the development is larger than a locally set floorspace threshold, or 2,500 sq.m. in the absence of such a threshold. In this instance, the locally set threshold is also 2,500 sq.m. The site can be considered edge-of-centre as it borders Kentish Town District Centre on its southern boundary.
30. In line with paragraph 86 of the NPPF and London Plan Policy SD7, given the quantum of town centre uses floorspace proposed, the applicant has undertaken a town centre impact study to justify the proposed uses. The impact assessment concludes that the proposed development would not have a significant adverse impact on Kentish Town District Centre.
31. In terms of office use, the site has been identified for employment use in the draft site allocation document and the Camden Local Plan, at Chapter 5, includes offices in the definition of 'employment use'. The KTPF provides further localised detail, stating that offices would be supported across the area, provided that the industrial character is not compromised. Moreover, large-floorplate offices are not preferred.
32. The proposed office floorspace will be primarily aimed at small and medium-size businesses with a suitable range of flexible and sized floorplates with a focus on industrial activity complementary businesses, growth sectors and creative industries. In addition, around 9% of this quantum is to be provided as affordable work space. The proposal's approach to office provision aligns with London Plan Policies E2, E3 and E8; this is welcomed. The remaining town centre uses proposed (retail and leisure) account for approximately 4% of the overall quantum of floorspace.
33. Kentish Town District Centre is described in Table A1.1 of the London Plan as having a low commercial growth potential and having demand for small office units. In view of this and considering the proposal's targeted tenants for the office space and the relatively small retail and leisure floorspace, the town centres uses are considered acceptable from a strategic perspective in this instance.

## Conclusion

34. In view of the plan-led approach being employed by the Council with regard to the introduction of residential and other non-industrial uses on this designated Locally Significant Industrial Site, the principle of an employment-led mixed used scheme is considered acceptable in line with Policies E4, E6, E7, H1 and S1 and Objectives GG1 and GG2 of the London Plan.

## **Skills and opportunities for all**

35. Good Growth Objective GG1 of the London Plan makes clear that everyone should benefit from economic opportunities in London to ensure a fairer and more equal city. Moreover, London Plan Policy E11 emphasises the need for strategic development proposals to support local employment, skills development and training opportunities. The application includes elements that would provide employment opportunities during the operational phase. The applicant is therefore expected to demonstrate how the development would provide training and employment opportunities not just during the construction but also during the operational phases of the development.

## **Housing**

36. The application is proposing a minimum of 750 and a maximum of 825 new homes. The tables below sets out the targeted unit mix for the two scenarios.

Table 3: Unit mix under minimum parameters

Affordable / Market Split		Total Units	Total Hab. Rooms		1B1P	1B2P	2B3P	2B4P	3B5P	4B6P
		750	2,064	Hab. Rooms	2	2	3	3	4	5
35%	21%	158	496	LAR	-	21%	19%	32%	20%	8%
				Units	-	33	30	50	32	13
				Hab. Rooms	-	66	90	151	126	63
	14%	105	256	Intermediate Rent	7%	49%	-	44%	-	-
				Units	7	51	-	46	-	-
				Hab. Rooms	15	103	-	139	-	-
65%	488	1,311	Market	15%	25%	4%	47%	9%	-	
			Units	73	122	20	229	44	-	
			Hab. Rooms	146	244	59	687	176	-	

Table 4: Unit mix under maximum parameters

Affordable / Market Split		Total Units	Total Hab. Rooms		1B1P	1B2P	2B3P	2B4P	3B5P	4B6P
		825	2,271	Hab. Rooms	2	2	3	3	4	5
35%	21%	173	546	LAR	-	21%	19%	32%	20%	8%
				Units	-	36	33	55	35	14
				Hab. Rooms	-	73	99	166	139	69
	14%	116	282	Intermediate Rent	7%	49%	-	44%	-	-
				Units	8	57	-	51	-	-
				Hab. Rooms	16	113	-	152	-	-
65%	536	1,443	Market	15%	25%	4%	47%	9%	-	
			Units	80	134	21	252	48	-	
			Hab. Rooms	161	268	64	756	193	-	

37. The proposed unit size mix generally responds well to the priorities identified in Camden's Dwelling Size Priorities Table.

#### Affordable housing

38. Policy H4 of the London Plan seeks to maximise the delivery of affordable housing, with the Mayor setting a strategic target of 50%. Policy H5 of the London Plan and the Mayor's Affordable Housing and Viability SPG set out a 'threshold approach', whereby schemes meeting or exceeding a specific percentage of affordable housing by habitable room, without public subsidy, and other criteria such as tenure mix are eligible for the Fast Track Route (FTR). Such applications are not required to submit viability information to the GLA and are also exempted from a late stage review mechanism. On public land at least 50% affordable housing is required; with respect to industrial land, at least 35% affordable housing is required if there is no net loss of industrial capacity. Where there is net loss of industrial capacity, at least 50% affordable housing must be provided to be eligible for the FTR. In each scenario, the threshold must be met without the use of public subsidy. Both Policy H4 and Policy H5 also apply to specialist housing as noted under London Plan Policy H13.
39. As defined in footnote 59 of the London Plan, floorspace capacity refers to 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% plot ratio, whichever is the greater.
40. Appropriate tenure splits should be determined through the Development Plan process or by supplementary planning guidance. In this case, Camden Council's Local Plan sets a strategic target to achieve 60% of affordable housing as social-affordable rent and 40% as intermediate.
41. As the site is partially owned by a public body, a blended approach to determining the level of affordable housing needed to qualify for the FTR is applied and this works out to be 39.2%. The scheme is proposing 35% affordable housing by habitable room, comprised of 60% London Affordable Rent and 40% Intermediate rent. This, however, applies solely to the self-contained housing as no information has been provided on the 8,000 sq.m. specialist housing proposed, to which Policies H4 and H5 also apply. In addition, it is understood that the 35% affordable housing proposed is subject to the outcome of ongoing discussions between the applicant and the LPA regarding the allocation of Community Infrastructure Levy funds and other matters including funding the 'Heath Line'. The scheme is therefore being assessed under the viability tested route and GLA officers on receipt of the Council's independent review will robustly interrogate this and the applicant's viability assessment to ensure that the maximum amount of affordable housing the scheme can deliver is secured.
42. Early, mid-stage and late stage viability reviews will be required if the scheme remains non-compliant with the Fast Track Route. If at Stage II it is demonstrated definitively that 39.2% affordable housing, with an acceptable affordable housing tenure mix and accounting for the specialist housing will be

delivered acceptably across phases then it may be considered Fast Track compliant and only an early stage review will be required. This will also be dependent on the quantum of use class E(g)ii that is dedicated to and suitable for research and development related to industrial processes.

43. The applicant is reminded that London Living Rent is the Mayor's preferred intermediate rent product and, in all cases, intermediated rented units should be provided in line with the household income cap (£60,000) and affordability eligibility criteria for intermediate rent products set out in the London Plan and the Mayor's Affordable Homes Programme Fund. A range of rents at income caps below the £60,000 cap should be secured for the first three months of marking in line with paragraphs 4.6.9 and 4.6.10 of London Plan Policy H6.
44. GLA officers would strongly advise proactive and early engagement on the wording of the draft S106 agreement prior to any Stage 2 referral being made, to ensure the wording is effective and aligns with policy requirements.

## **Heritage and urban design**

### **Heritage**

45. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should "*have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses*". If it is judged that harm to the heritage asset/s would arise from the proposed development, considerable importance and weight must be attributed to that harm, in order to comply with the statutory duties.
46. London Plan Policy HC1 provides that development proposals affecting heritage assets and their settings should conserve their significance by being sympathetic to the assets' significance and appreciation within their surroundings. Policy HC1 relates to all heritage assets, including non-designated heritage assets.
47. The NPPF states that when considering the impact of the proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation and 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. Significance is the value of the heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset's physical presence or its setting. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset. Locally listed buildings are considered non-designated assets.

48. As stated earlier in this report, there are two locally listed sheds on-site and there are conservation areas and listed buildings nearby. The application is supported by a townscape visual impact assessment (TVIA) and a built heritage assessment (BHS). Officers are satisfied that the assessment points in the TVIA form a comprehensive basis from which to assess the proposed scheme's impact on heritage assets and those most likely to be impacted by the proposed development are analysed below.

#### Locomotive Sheds 2 and 3

49. The sheds are listed as 81a Highgate Road (off Sanderson Close) on the local register. Constructed of red brick, the sheds date back to the 19th century when they were used for Midland Railway and are of architectural and townscape significance. The sheds have undergone alterations at various times over the years including in response to bomb damage. The sheds are to be redeveloped for use and although full details of this redevelopment is not finalised, guidelines in the Design Code states that alterations or retention works must not comprise the demolition of the entire building. The restoration of these sheds would result in some degree of harm but overall the improved settings and their public use is a significant benefit of the proposal. Any harm caused is expected to be less than substantial harm

#### Grade II Christ Apostolic Church

50. The listed asset is adjacent to the application site on its south-eastern boundary along Greenwood Place and Highgate Road. As is evident in View 8 (Fortress Walk), there are no buildings in the background of the church and its two spires are the dominant features in the existing view. The proposal would emerge as background buildings; however, these would be distinct and those directly behind the church at a lower height than the spires. This change in the background view could enhance or lead to some harm depending on the quality of the final architecture. Any potential harm, however, would likely be less than substantial.

#### Conservation Areas

51. Mansfield, Kentish Town, Bartholomew Estate, Dartmouth Park and Inkerman Park Conservation Areas are all nearby. Within each conservation area (CA), the new development would be visible from some viewpoints. Given the height and architectural approach of the proposal, its emergence on the skyline in views looking out of each CA would have an impact on how each CA is experienced from those specific points. This change would lead to some harm to each conservation area's significance, albeit, less than substantial.

#### Heritage conclusion

52. Having regard to the statutory duty in respect of listed buildings in the Planning (Listed Buildings and Conservation Areas) Act 1990, and the relevant paragraphs in the NPPF, GLA officers consider that any harm caused to the nearby assets mentioned above would be less than substantial harm. As harm has been identified, the scheme does not comply with London Plan Policy HC1;

however, in accordance with the NPPF, this less than substantial harm would, in the view of GLA officers, be clearly and convincingly outweighed by the public benefits of the scheme, which include a significant quantum of flexible employment floorspace, affordable workspace, healthcare facility, a large number of new housing units, specialist housing, affordable housing and new cycle and walking routes.

### **Protected views**

53. Policy HC4 and Policy HC3 of the London Plan are clear that development should not harm the composition of strategic and local views. The development is not within a strategic view but would be visible in several LVMF London Panorama views from Parliament Hill and Kenwood (2A.1 and 2B.1 from Parliament Hill and 3A.1 from Kenwood). As mentioned earlier, locally designated views to Parliament Hill from Kentish Town Station cross the site. Further assessment of the development within the context of these views is provided later in this report under visual impact.

### **Urban design**

54. Chapter 3 of the London Plan sets out key urban design principles to guide development in London. Design policies in this chapter seek to ensure that development optimises site capacity; is of an appropriate form and scale; responds to local character; achieves the highest standards of architecture, sustainability and inclusive design; enhances the public realm; provides for green infrastructure; and respects the historic environment.

### Optimising development capacity/residential density

55. Policy D3 of the London Plan encourages the optimisation of sites, having regard to local context, design principles, public transport accessibility, and capacity of existing and future transport services. The higher the density of a development, the greater the level of design scrutiny that is required, particularly the qualitative aspects of the development design, as described in London Plan Policy D4. The scheme has been subject to a design review in accordance with Policy D4 and the panel's reports have been submitted with the application.
56. The application is supported by a design and access statement (DAS), which sets out the evolution of the design and how it has responded to the comments resulting from the design review. This is welcomed. Given that the application is in outline form, parameter plans, a development specification and design code have also been submitted as control documents. The submission of the latter accords with Policy D4 of the London Plan and subject to being satisfactorily secured, the design code provides a comprehensive basis for assessing future Reserved Matters applications and outlines framework principles, site-wide codes, massing codes and character area codes.

### Site layout and public realm

57. The site is bounded by railway tracks on three sides. Access to the site is restricted to three points from Greenwood Place, Gordon House Road and Sanderson Close. Vehicular access to the residential and industrial/commercial components of the scheme is fully segregated (residential from Gordon House Road and industrial/commercial from Sanderson Close). This is welcomed. The frontages to all the buildings are also well-activated.
58. A new pedestrian/cycle route ('the Heath Line') that connects Hampstead Heath, Gospel Oak and Kentish Town station is proposed as in the Kentish Town Planning Framework. At the middle of the 'Heath Line' is a 9.5m level change where there are proposals for a stepped landscape with accessible ramps. Running parallel to the 'Heath Line' is an additional raised 'Heath Line' to the north proposed as a primary cycle route designed to TfL cycle standards. These are welcomed.
59. Future wider connections, including landing areas for future bridge links, are established to the south and south-east of the site to connect the site to Regis Road development area, Kentish Town station and Carkers Lane. Proposed routes through the site are considered key to the success of the development and its integration with its surrounds. Provisions that enable the delivery of these links should be secured as part of the application.

### Massing and height

60. Considering the guidance on tall buildings set out in London Plan Policy D9 and Camden Local Plan Policy D1, the proposal constitutes buildings that meet the definition of a tall building.
61. London Plan Policy D9 states that tall buildings should only be developed in locations identified as suitable in development plans. Policy D9 also states that tall buildings must address their visual, functional, environmental and cumulative impacts and achieve exemplary architectural and materials quality.
62. The Planning and Regeneration Statement (PRS) accompanying the application sets out an assessment of the proposal against Policy D9C.

### *Visual*

63. On the visual impact, the PRS emphasises that the nearby LVMF views and local views that cross the site were considered in the design process from the outset and this determined the distribution of form and massing across the site, with the lower buildings sited in the centre of the site under the locally protected view Parliament Hill from Kentish Town Station. The PRS further notes that the proposals would be visible from these views but that this is unavoidable once the most efficient use of this designated land for regeneration is pursued.
64. GLA officers note that the tall buildings would appear in long-range views as a cluster, with the two taller blocks in the centre of the site. Variation in heights and a variety of well-articulated rooflines are proposed and this approach would

make a positive contribution to the emerging skyline. In mid-range views the buildings would aid in wayfinding and legibility, especially if the 'Heath Line' is delivered. The height strategy has also been appropriately stepped down in scale to respond to adjacent buildings and this is evident along the northern edge towards Gordon House Road and Highgate Road. With respect to immediate views, the ground floors of all buildings are proposed to be well animated, ensuring a direct relationship with routes across the site. The increased permeability and public realm proposed would also help to create a human scale and enhanced vitality.

65. As mentioned earlier under 'Protected Views', the development would be visible in several LVMF London Panorama views from Parliament Hill and Kenwood. Developments within London Panoramas should be managed so that development fits within the prevailing pattern of buildings and should not detract from the panorama as a whole. Development in the foreground and middle ground of London Panoramas that is overly intrusive, unsightly or prominent to the detriment of the view as a whole should be refused.
66. While the distribution of massing and heights is broadly supported and proposals to differentiate the colour of individual building façades to reduce coalescence when viewed from distance is welcomed, the cluster of tall buildings at the heart of the site appears substantial in the middle ground view from Parliament Hill. Further refinement of buildings' forms and height is recommended and the information on how the proposed heights relate to the hierarchy of tall buildings in the wider borough should be submitted. This would allow GLA officers to fully assess any impact from the development on the composition of both the local and strategic views.
67. As stated earlier in this report, any harm caused to nearby heritage assets would be less than substantial and this would be outweighed by the scheme's public benefits. Further solar glare assessment is to be undertaken at Reserved Matters and this should be secured by the Council as well as a lighting strategy to mitigate any potential internal and external light pollution.

#### *Functional*

68. The PRS states that, in addition to the southern part of the site being safeguarded to facilitate future connectivity in recognition of the site's potential to be a catalyst for further regeneration, the following would apply:
  - servicing along the northern edge will not interfere with the public realm and to the south via access-controlled routes, which prioritise pedestrian and cycle movements;
  - easily accessible and high-visible entrances with consideration given to natural surveillance and overlooking from dwellings and other uses;
  - spill out spaces alongside active ground floor uses;
  - new walking and cycling routes to accommodate movement through the site; and,
  - adequate fire safety provisions.

69. There are some concerns about the increased in walking and cycling trips as a result of the development; this is discussed in detail under transport. The applicant should also address any impacts on aviation, telecommunication and the solar energy generation of surrounding buildings.

#### *Environmental*

70. In terms of the environmental impacts, the Environmental Statement (ES) submitted with the application contains chapters on wind microclimate, noise and vibration, daylight, sunlight and overshadowing. The GLA will consider the Council's review and draw a conclusion in relation to compliance with London Plan Policy D9C(3) when the application is referred back to the Mayor at Stage 2. It is expected that any mitigation measures identified in the ES will be appropriately secured.

#### *Cumulative*

71. Assessments of the cumulative impacts of the proposal have been undertaken in various chapters of the ES and where necessary suitable mitigation measures have been identified. The proposal therefore does not raise any significant adverse cumulative visual, functional (apart from the matter of increased pedestrian and cycling) and environmental impacts with other tall buildings in the vicinity of the site at this time subject to the Council's review.

#### *Conclusion*

72. In conclusion, the proposal does not comply with Part B of Policy D9 as it is not located in an area identified as potentially suitable in the development plan for tall buildings; however, the development may accord with the qualitative assessment criteria set out in Part C of Policy D9 subject to the satisfactory resolution of the outstanding impacts raised through the provision of further information and/or imposition of conditions to secure mitigation measures. Officers will draw a conclusion in relation to compliance with Policy D9 when the application is referred back to the Mayor at Stage 2.

#### Residential quality

73. Indicative floorplans of the proposed residential buildings illustrate that high residential quality can be achieved; however key aspects of the residential layout such as number of units sharing the same landing, direct entrances to ground-floor units and maximum proportion of single aspect units will need to be appropriately secured in the design code. Void-to-solid ratios should also be set out to ensure the maximum perimeter volumes are not excessively filled out creating overly bulky massing. The design code indicates that where private external amenity space is not provided, apartments may be oversized or provided with additional communal external amenity space in lieu of private amenity space. Private external amenity space should be provided to each residential unit, unless it can be robustly demonstrated that this is not feasible. To ensure this is achieved, a suitable condition should be secured by the Council. Compliance with London Plan Policy D13 on the agent of change

should also be secured and demonstrated as part of the Reserved Matters stage.

#### Industrial quality

74. Industrial use is proposed across a number of plots in the southern half of the site and the two sheds. Various typologies including a stacked block is proposed. Design guidelines indicate that a good quality of flexible industrial floorspace would be delivered with minimum floor to ceiling heights of 3.5m, adequate goods lifts and servicing arrangements. To address noise and vibration, design guidance for acoustic specifications has also been set out. As stated above, compliance with Policy D13 is required and should be secured.

#### Appearance

75. The emerging architecture and material palette is welcomed and takes cues from the character of the site and its environs. The scheme has the potential to create a high-quality development. Key details such as window reveals, rooflines and ground frontages should be secured.

#### Playspace

76. In accordance with Policy S4 of the London Plan, development proposals that include housing should provide play space for children based on the short and long-term needs of the expected child population generated by the scheme. The illustrative masterplan indicates that up to 5,212 sq.m. of play space can be accommodated within the future landscape proposals. This amount significantly exceeds the required provision using the GLA's 2019 child play space calculator. The play strategy contains diverse play elements that would allow for passive surveillance, which is welcomed. The Council should ensure that the detailed provision secured at Reserved Matters stage incorporates these features and others such as safety and ensures that the play space would not be segregated by tenure.

#### Fire safety

77. An outline fire strategy prepared by personnel at Elementa Consulting has been submitted with the application, which seeks to address the requirements of London Plan Policy D12 and Policy D5. Detailed fire strategies should be secured at Reserved Matters for each phase and it must be demonstrated that at least one suitably sized fire evacuation lift is provided within each core where applicable in line with Policy D5. The final strategy must also contain a declaration of compliance that the fire safety of the proposed development and the fire safety information satisfy the requirements of London Plan Policy D12A and has been prepared by suitably qualified personnel.

#### Inclusive access

78. The DAS demonstrates that inclusive access has been considered as part of the design process in relation to many elements of the scheme including the public realm, play spaces, entrances, circulation, wayfinding and parking. In line

with London Plan Policy D7, at least 10% of dwellings would meet Building Regulation requirement M4(3) and 90% Building Regulation requirement M4(2). This compliance should be secured by the Council and Reserved Matters applications should provide plans showing where the wheelchair accessible homes would be located and these units should be distributed across tenure types and sizes to give disabled and older people similar choices to non-disabled people. Compliance with London Plan Policy D5 in terms of entrances, horizontal and vertical circulation in the non-residential buildings and specialist housing, as well as the public realm, should be secured by the Council.

## **Sustainable development and Environmental issues**

### Energy strategy

79. London Plan Policy SI2 requires all major developments to be net zero carbon. Where it is robustly demonstrated that this cannot be achieved onsite, a cash in lieu contribution to the borough's carbon offset fund is one of two options available to make up the shortfall. The applicant has submitted an outline energy strategy, which is generally compliant with relevant London Plan policies. Further information or clarifications, however, are required in relation to energy costs to occupants, overheating, DHN opportunities for heat recovery on site, PVs and the energy system/ heat pumps. An estimation of CO<sub>2</sub> emissions should also be provided for all stages. The 'Be seen' policy also needs to be addressed and the applicant's commitment that the development will be designed to enable post construction monitoring secured in the Section 106 agreement. On receipt of the additional information and/or clarifications, on-site carbon reductions and any carbon off-set contribution required will be confirmed.

### Whole Life Carbon

80. London Plan Policy SI2 requires development proposals that are referable to the Mayor to calculate and reduce whole life-cycle carbon (WLC) emissions to fully capture the development's carbon footprint. The applicant has provided a Whole-life Cycle Carbon Excel template as is required. Further confirmation or clarifications, however, relating to estimated emissions and material quantity are required.

### Circular economy

81. In accordance with Policy SI7 of the London Plan a circular economy statement has been submitted with the application, which is welcomed. However, additional information on the proposed GIA; submission of a strategic approach as required in Table 1 of the GLA's guidance; and commitments to policy targets are all required.
82. Full technical details of the outstanding issues associated with the energy strategy, WLC assessment and circular economy strategy have been sent directly to the applicant and Council.

### Urban greening

83. London Plan Policies G1 and G5 emphasise the importance of urban greening in development. Acceptable urban greening features include street trees, green roofs, green walls, rain gardens and hedgerows. Policy G5 recommends that a target Urban Greening Factor (UGF) score of 0.3 should be achieved on predominantly commercial development, excluding B2 and B8 uses. The application, which is predominantly commercial (with a significant amount of B2/B8 floorspace) is currently achieving a score of 0.26. It is understood that the landscape proposals will be revisited as part of reserved matters application. The applicant should aim to achieve a score of at least 0.3 during this process and the Council should secure the submission of a colour coded plan showing the extent of the different surface cover types for the final strategy proposed as part of any reserved matters application.

### Sustainable drainage, flood risk and water efficiency

84. The site is located within Flood Zone 1, but is larger than one hectare; therefore, a flood risk assessment (FRA) has been submitted as required by the NPPF. The FRA considers risks from tidal/fluviat, pluvial, groundwater and artificial sources as well as infrastructure failure and concludes that the site will be at low risk of flooding from these sources. When mitigation measures are considered, the residual flood risk to the site is low. The FRA provided for the proposed development, therefore, generally complies with London Plan Policy SI12. In terms of sustainable drainage, blue and green roofs, geo-cellular storage, bio-retention areas and green infrastructure are proposed. The proposed attenuation and rainwater re-use are measures high in the drainage hierarchy set out at London Plan Policy SI13B and are welcomed, and the submission of a final strategy incorporating these measures should be secured by the Council.
85. Regarding water efficiency, the sustainability statement indicates that for the non-residential components of the development, a BREEAM rating of 'Excellent' is targeted. It is also acknowledged in the statement that the residential units need to achieve a maximum indoor water consumption of 105 l/person/day in accordance with London Plan Policy SI5. To ensure compliance, a consumption of 105 l/person/day for the residential units and at least the BREEAM excellent standard for the 'Wat 01' water category for the commercial element should be secured by planning condition.

### Air quality

86. London Plan Policy SI1 requires applications to be accompanied by an air quality assessment, which demonstrates how the development would not lead to further deterioration of existing poor air quality, create any new areas that exceed air quality limits (or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits) or create unacceptable risk of high levels of exposure to poor air quality. Master planned large-scale development proposals, subject to an ES, should consider how local air quality can be improved across the area of the proposal as part of an air quality positive approach. The application is supported by an air quality report (Chapter

8 of the ES Volume 1) and an air quality positive statement. The Air Quality Positive Statement details what measures have been employed and their benefits as well as the practicable actions taken to reduce off-site impacts and reduce exposure to air pollution on-site. According to the ES, the development is expected to be better than air quality neutral in terms of building and transport emissions. GLA officers will undertake a detailed assessment of the submitted documents and provide further comments directly to the applicant and Council prior to the Mayor making his final determination.

### Biodiversity

87. London Plan Policy G6 states that proposals that create new or improved habitats that result in positive gains for biodiversity should be considered positively. Policy G6 further states that development proposals should aim to secure net biodiversity gain. Given the current state of the site, the proposed planting and landscaping would achieve biodiversity net gain.

### Digital connectivity

88. A planning condition should be secured requiring the submission of detailed plans demonstrating the provision of sufficient ducting space for full fibre connectivity infrastructure within the development in line with London Plan Policy SI6.

## **Transport**

### Access and car parking

89. The site is currently accessed at its north, east and south east edges via Gordon House Road, Sanderson Close and Greenwood Place respectively. These three existing access points would be retained and a new one created on Gordon House Road. Separate access for commercial and residential vehicles is proposed to maintain the car-free areas of the site. The main commercial access from Sanderson Close would be controlled access only to prevent unauthorised use. This is welcomed.
90. The current site access at Greenwood Place is proposed to become pedestrian, cyclist and emergency vehicles only in the end state development. Although the improvements currently proposed, which include footway widening, are supported and should be secured through the section 278 agreement with Camden Council, Pedestrian Comfort Levels (PCLs) expected (as a result) are relatively low. Pedestrian priority and safety should be maximised at this location, taking into consideration future pedestrian activity due to both the proposed development and neighbouring sites including the Kentish Town Forum.
91. The access arrangements proposed at Sanderson Road and Greenwood Place also require a Stage 1 Road Safety Audit (RSA) and Designer's Response produced in accordance with TfL guidance and shared with the Council prior to determination.

92. The removal of extensive areas of commercial parking and circulation and replacement with areas of car-free residential and public realm is welcomed to reduce vehicle dominance in accordance with London Plan Policy T6. All future occupiers should be prevented from obtaining local car parking permits through the Section 106 agreement. Operational car parking for the re-provided industrial uses is proposed at a ratio of 1 space per operator occupying less than 1,000 sq.m. and 1 space per 1,000 sq.m. for larger occupiers. This complies with London Plan Policy T5 and is therefore considered acceptable.
93. A total of 25 Blue Badge car parking spaces are proposed initially for 825 residential units, (3%) with a further 7% if required. This complies with Policy T6 and Policy T6.1.
94. All parking spaces will be provided with an electric vehicle charging point (EVCP) from the outset which is welcomed in line with Policy T5. The submitted Car Parking Management Plan is welcome. A full parking design and management plan should be secured by condition or obligation.

#### Trip generation

95. The trip generation assessment forecasts a net decrease in vehicle trips but a considerable increase in public transport and active travel with 1,089 (two-way) underground, 607 rail, 600 bus, 1,041 walking and 383 new cycling trips during peak periods. Further clarification, however, is requested on the mode share assumptions for the expected net trip generation across all proposed land uses, a breakdown of underground/rail trips by route, station and direction, and further justification for the assumptions underpinning linked and local trips a for the non-residential elements.
96. The proposed development would generate a significant increase in walking and cycling trips in the local area, including linked trips to public transport stops and stations. Accordingly, the creation of new active travel routes through and beyond the site are urged to address this demand including the 'Heath Line' and Makers Lane referred to below.

#### Active Travel Zone (ATZ), cycling and cycle parking

97. The proposals are supported by an Active Travel Zone (ATZ) assessment. This has identified potential improvements to local routes against the Healthy Streets indicators, as required by London Plan Policy T2. The assessment shows cyclists currently share the carriageway with vehicles on Highgate Road and Fortress Road, along cycle routes connecting the site to Kentish Town and Tufnell Park stations. To ensure compliance with Policy T5, a TfL cycle route quality criteria check should be carried out for these routes prior to determination.
98. The Council is encouraged to secure funding for local walking and cycling improvements, and new wayfinding signage, through section 278 (S278), S106 or works in kind, as appropriate. For example, the extension of cycle improvements to improve safety north of the junction between Kentish Town

Road, Highgate Road and Fortress Road. This is reinforced by casualty data indicating that improvements at this location should be a priority.

99. Long stay and short stay cycle parking must at least meet the minimum standards in London Plan Policy T5, with showers, lockers and changing facilities. Short stay cycle parking proposed should be Sheffield stands in the public realm within the application site's red line boundary.
100. The total amount of cycle parking proposed for all uses should be clarified to demonstrate that the London Plan minimum could be delivered against the potential maximum land use. The final amount, design and layout of the spaces should be secured by condition and must follow the London Cycling Design Standards (LCDS) in accordance with Policy T5.

#### 'Heath Line' and 'Makers Lane'

101. The applicant indicates that its proposals will facilitate the Council's aspiration for the Heath Line, a new north-south active travel link, and also Makers Lane, an east-west link between Highgate Road and Kentish Town West. The applicant has indicated that the provision of these routes would increase the site's PTAL from between 2 and 5 to 5 throughout. The principle of this is strongly supported in line with London Plan Policies T1 and T2. The applicant should, however, clarify whether the proposals would deliver elements of these routes within the site as works in kind. Moreover, their benefits would only be realised if the proposed development is fully integrated into the local future active travel network with Heath Line and Makers Lane included. This would help to the severance of the site to its surroundings and to accommodate the high walking and cycling potential of the area that was identified in the Council's Kentish Town SPD.
102. The applicant should therefore set out how the 'Heath Line' and 'Makers Lane' would link through its other land leading to Highgate Road to the east and Gospel Oak to the north. The design and delivery of the 'Heath Line', together with necessary wayfinding should be secured through the Section 106 agreement.

#### Infrastructure protection

103. Due to the proximity of the site boundary to London Overground infrastructure, an infrastructure protection agreement with TfL must be secured, for both construction and long-term occupation.

#### Kentish Town station

104. The Thameslink areas of Kentish Town station are currently served by a temporary gateline to maintain access during escalator replacement works by TfL. Making this change permanent may enable provision of additional gateline capacity to address development demand. Further discussion with TfL about Section 106 funding as necessary should take place in line with London Plan Policy T4. Funding being secured to enhance step-free access to LU or Thameslink services at Kentish Town station would also be supported.

## Buses

105. Minor revisions to the transport assessment are needed to alter the distribution of expected bus trip generation across different TfL services. The bus stop on the south side of Gordon House Road should be replaced and upgraded in line with London Plan Policy T3E.

## Transport-related plans

106. A framework travel plan has been submitted, which is welcomed. Funding for implementation and monitoring should be secured in the Section 106 agreement. More ambitious active travel targets may be recommended prior to the Mayor making his final determination at Stage 2. An outline construction management plan has been submitted that follows local guidance. This supports London Plan Policy T4 part B; however, the plan only includes generic impact mitigation measures and does not follow TfL's guidance. A full final version should be secured by pre-commencement condition and discharged in consultation with TfL due to the proximity of TfL rail infrastructure.

## **Local planning authority's position**

107. Camden Council planning officers are currently assessing the application. In due course the Council will formally consider the application at a planning committee meeting.

## **Legal considerations**

108. Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged; or, direct the Council under Article 6 of the Order to refuse the application; or, issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application (and any connected application). There is no obligation at this stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

## **Financial considerations**

109. There are no financial considerations at this stage.

## **Conclusion**

110. London Plan policies on employment land/LSIS, housing, affordable housing, social infrastructure, retail, heritage, urban design, strategic views, sustainable development, environmental issues and transport are relevant to this

application. Whilst the proposal is supported in principle, the application does not fully comply with these policies, as summarised below:

- **Land Use Principles:** In view of the plan-led approach being employed by the Council with regard to the introduction of residential and other non-industrial uses on this designated Locally Significant Industrial Site, the principle of an employment-led mixed used scheme is considered acceptable in line with Policies E4, E6, E7, H1 and S1 and Objectives GG1 and GG2 of the London Plan.
- **Affordable housing:** The scheme is proposing 35% affordable housing by habitable room, with 60% LAR and 40% Intermediate rent; however, as the site is partially public land, the scheme does not qualify for the Fast Track Route. Early, mid and late stage reviews are required.
- **Heritage and urban design:** Any harm to heritage assets would be less than substantial harm and this harm would be outweighed by the scheme's public benefits; further information and clarifications (including the imposition of planning conditions) to conclude the assessment of the proposal against Policy D9C.
- **Sustainable development and Environmental issues:** Further information is required on the energy strategy, WLC assessment and circular economy. Compliance with London Plan water efficiency, digital connectivity and SUDs requirements should be secured.
- **Transport:** Further consideration of appropriate funding sources for the proposed 'Heath Line' and 'Makers Lane' routes is encouraged; access arrangements proposed at Sanderson Road and Greenwood Place should be safety audited; and various transport-related plans, financial contributions, an infrastructure protection agreement and EVCPs should be secured via conditions or planning obligations as appropriate.

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