

<b>Address:</b>	120-136 Camley Street London N1C 4PG		<b>1</b>
<b>Application Number:</b>	2025/4341/P	<b>Officer:</b> Christopher Smith	
<b>Ward:</b>	Camden Square		
<b>Date Received:</b>	01/10/2025		
<b>Proposal:</b>  Demolition of all existing buildings (Class B2) and structures and associated works and erection of new buildings comprising a mixed-use redevelopment of residential (Class C3) and commercial (Class E) uses, together with all landscaping, public realm, cycle parking, car parking, highways works and associated works (see associated application ref. 2025/4364/P at 3-30 Cedar Way).			
<b>Background Papers, Supporting Documents and Drawing Numbers:</b>  The development hereby permitted shall be carried out in accordance with the following approved plans:  ***See Conditions List***			
<b>RECOMMENDATION SUMMARY:</b>  <b>Grant conditional Full Planning Permission following:</b> <b>(i) referral to Mayor of London for his direction,</b> <b>(ii) finalisation of detailed wording for conditions following consultation with the Mayor, and</b> <b>(iii) completion of Shadow Section 106 Agreement.</b>			
<b>Applicant:</b>		<b>Agent:</b>	
London Borough of Camden (Community Investment Programme) c/o Agent		Mr Oliver Jefferson Turley Brownlow Yard 12 Roger Street London WC1N 2JU	

## ANALYSIS INFORMATION – SITE A

### *Existing floorspace*

Existing use	Floorspace (GIA)
Car Repair Workshops (Use Class B2)	1,289sqm

### *Proposed number of homes*

Market Homes	Affordable Homes (Social Rented)	Total Homes
0 (0%)	119 (100%)	119

### *Proposed floorspace*

Affordable Commercial (GIA)	Market Residential (GIA)	Affordable Residential (GIA)	Total Area (GIA)
2,119sqm (13%)	0 (0%)	13,927sqm (87%)	16,046sqm (100%)

### *Proposed housing mix and tenure*

Tenure	1 bed	2 bed	3 bed	4 bed	Total
Market	0 (0%)	0 (0%)	0 (0%)	0 (0%)	<b>0 (0%)</b>
Affordable - Social-Rent	25 (21%)	51 (43%)	27 (23%)	16 (13%)	<b>119 (100%)</b>
<b>Total homes</b>	<b>25 (21%)</b>	<b>51 (43%)</b>	<b>27 (23%)</b>	<b>16 (13%)</b>	<b>119</b>

## ANALYSIS INFORMATION – COMBINED SITES A & B

### *Proposed number of homes*

Site	Market homes	Intermediate rent homes	Social rent homes	Total homes
A	0 (0%)	0 (0%)	119 (100%)	119 (30%)
B	203 (72%)	79 (28%)	0 (0%)	282 (70%)
<b>TOTAL</b>	<b>203 (50.6%)</b>	<b>79 (19.7%)</b>	<b>119 (29.7%)</b>	<b>401</b>

***Proposed floorspace***

Site	Commercial (sqm GIA)	Market Residential (sqm GIA)	Affordable Residential (sqm GIA)	Total Area (sqm GIA)
A	2,119 (13%) (affordable)	0 (0%)	13,927 (87%)	16,046 (22%)
B	28,677 (50%)	21,346 (37%)	7,176 (13%)	57,199 (78%)
<b>TOTAL</b>	<b>30,796 (42%)</b>	<b>21,346 (29%)</b>	<b>21,103 (29%)</b>	<b>73,245</b>

***Proposed housing mix and tenure***

Tenure	1 bed	2 bed	3 bed	4 bed	Total
Social rent (Site A)	25 (21%)	51 (43%)	27 (23%)	16 (13%)	<b>119 (29.7%)</b>
Intermediate rent (Site B)	38 (48%)	41 (52%)	0 (0%)	0 (0%)	<b>79 (19.7%)</b>
Market (Site B)	77 (38%)	89 (44%)	37 (18%)	0 (0%)	<b>203 (50.6%)</b>
<b>Total homes</b>	<b>140 (35%)</b>	<b>181 (45%)</b>	<b>64 (16%)</b>	<b>16 (4%)</b>	<b>401</b>

## EXECUTIVE SUMMARY

The Application Site at 120-136 Camley Street comprises a 0.48 hectare triangular plot bounded by Agar Grove to the north, railway lines to the east and south, and Camley Street/Agar Grove Estate to the west. This area is hereafter referred as the “Site”. It is also known as Site A in the context of the two parallel planning applications for the comprehensive mixed-use redevelopment of two industrial sites located to the north-west of King’s Cross: 120-136 Camley Street, N1C 4PG (this site – Site A) and 3-30 Cedar Way, N1C 4PD (referred to as Site B).

The proposals at Site A would deliver an interlinked mixed-use building over three blocks of development including Blocks A1 and A2 (lower ground and ground plus eight storeys) and A3 (lower ground and ground plus 13 storeys), comprising residential units on upper storeys and commercial (and ancillary residential) uses on lower ground and ground floors.

The nine existing industrial workshop buildings (Use Class B2) on site would be demolished. The Local Plan seeks to protect employment space but does allow for redevelopment of sites in some cases where it allows for intensification and the delivery of other priority uses like housing. The site is a non-designated employment site and Council’s emerging Local Plan allocates the land for redevelopment (Site Allocation S5) in the form of new permanent self-contained homes and commercial space, which would be provided on Site A in the form of social rented homes and affordable workshop space. The Camley Street Neighbourhood Plan and the Canalside to Camley Street SPG both identify this area as a key site in the comprehensive redevelopment and significant transformation of the wider Camley Street area.

The proposed redevelopment would make the best use of the land by achieving optimised and higher density development on the site in accordance with the ambitions of the emerging site allocation which envisages significant transformation of the mix of uses and character of the site. The proposal will result in the loss of industrial space but includes a larger quantum of employment floorspace of a type which is more compatible with the residential.

The development would provide 119 housing units as 100% social rented accommodation which would make a significant contribution towards the Council’s housing targets and in alleviating the demand for Council housing. The commercial floor space would all be provided as affordable creative maker space which would support small and start-up businesses. The new homes would be of a high quality with energy demand minimised.

The proposed buildings are considered to be of a height, form and detailed design which responds well to its surrounding context. The spaces around the buildings have also been designed to create a welcoming, inclusive and safer environment for residents and will knit the scheme into the wider area with improved connections.

Officers have identified some less than substantial harm to heritage assets, at between the medium and very low end of the scale if the development proposals on both Site A and Site B are completed. However, for Site A only, the harm would be less than substantial at the lower end of the scale only, with this impact being to the Camden Square Conservation Area. This harm is given considerable weight and importance in the decision-making process. The level and nature of the harm have been carefully considered given the context at this site where development is expected to come forward with an increased density, as indicated by the emerging site allocation, and which would secure social, environmental and economic benefits including new social housing, affordable workspace and an improved public realm including a new public square.

The height and scale of the scheme compared to the existing low rise structures means there would be significant impacts to some existing and future residents nearby from loss of light however these impacts would be limited to a small number of properties and are considered acceptable given the wider benefits this application would provide both economically and in terms of new housing and affordable workspace.

The development would be car free with good quality cycle parking provided within the new buildings and the public realm. A significant benefit of the scheme is the improvement of the cycle path on the western side of the site. Financial contributions would secure improvements to the transport, pedestrian and cycling environment in the local area, mitigating impact on local transport infrastructure. The impact from demolition and construction would be carefully managed throughout the development via a Construction Management Plan with continuous engagement secured through a Construction Working Group.

The development would secure notable economic benefits through employment, with planning obligations ensuring that some of these benefits will be directed to local residents and businesses. The development would significantly improve public safety in the local area through improved pedestrian activity, active frontages and street lighting.

Officers consider that there are significant and compelling public benefits, including the provision of new affordable housing and affordable workspace, energy-efficient high-quality homes, urban renewal providing high-quality public realm, and improved safety and security in the local area, that would outweigh any heritage harm associated with the scheme.

The scheme complies with the development plan as a whole and therefore the recommendation is to grant permission subject to conditions and a shadow S106 legal agreement.

## **OFFICER REPORT**

### **Reason for Referral to Committee:**

Residential development involving the construction of a building, resulting in provision of 10 or more new dwellings (including flats) [Clause 3(i)]; non-residential development involving the construction of a building resulting in an increase of more than 500sqm of non-residential floorspace [Clause 3(ii)]; and development involving a S106 obligation for which the Director of Economy, Regeneration and Investment does not have delegated authority [Clause 3(iv)].

### **Referral to the Mayor:**

The application would provide more than 15,000sqm of floorspace and buildings over 30m in height and is therefore referable to the Mayor under the Mayor of London Order 2008. The Mayor has the power to direct the local authority to refuse the application or call in the application for determination.

### **Environmental Impact Assessment (EIA):**

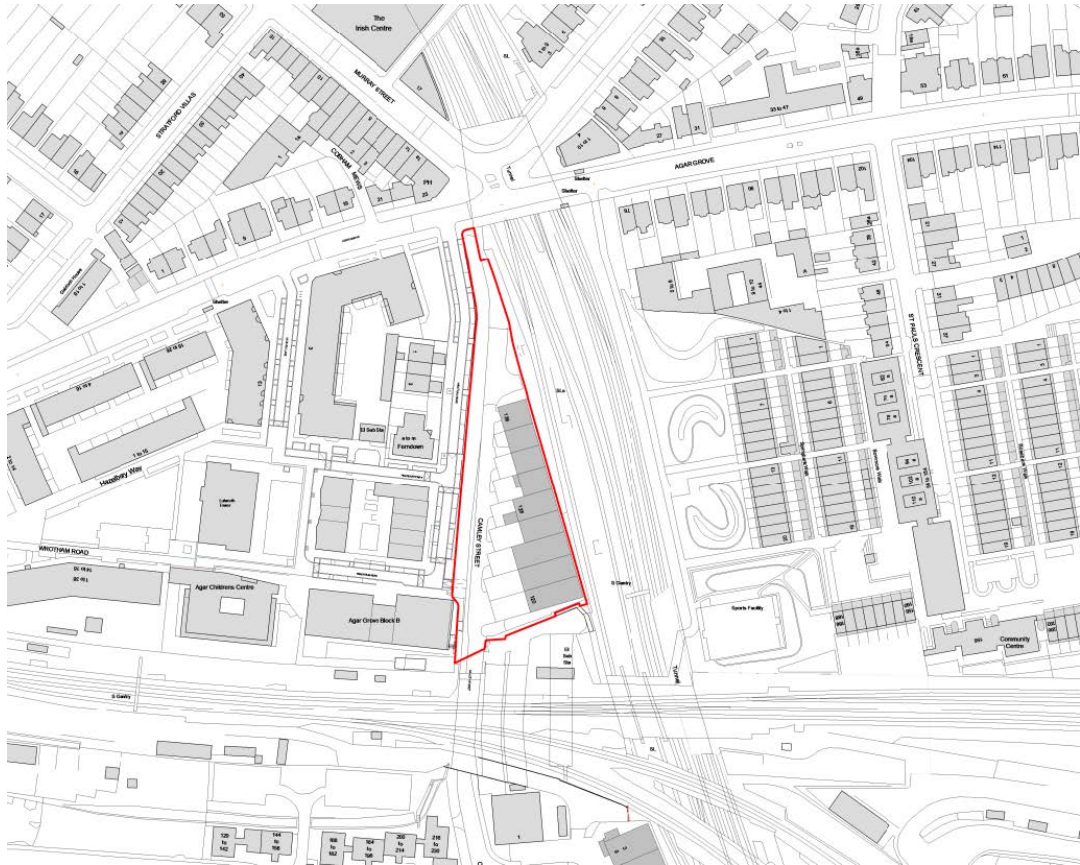
The development is EIA development. In February 2025 a formal request for a Scoping Opinion for the proposed development of both Sites A and B was submitted to the Council in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) ('the EIA Regulations') (Ref. 2025/0594/P).

The Environmental Scoping Opinion was issued by Camden Council on 29th May 2025 and concluded that the environmental topics recommended to be included within the Environmental Statement ("ES") would meet the statutory requirements set out in Section 15(2)(a) of the EIA Regulations.

This application is supported by an Environmental Statement ("ES"), prepared by Temple Group. Following a review by the Council's appointed consultants, Buro Happold, additional information and clarification has been provided through Addendum ES and Non-Technical Summary documents. These documents were subject to further consultation. The Addendum ES has also been independently reviewed by Buro Happold who are satisfied that the document is robust and comprehensive.

## **1. THE SITE**

- 1.1 120-136 Camley Street comprises a 0.48 hectare triangular plot bounded by Agar Grove to the north, railway lines to the east and south, and Camley Street/Agar Grove Estate to the west. It is also known as Site A in the context of the two parallel planning applications for the comprehensive mixed-use redevelopment of two industrial sites located to the north-west of King's Cross: 120-136 Camley Street, N1C 4PG (this site – Site A) and 3-30 Cedar Way, N1C 4PD (referred to as Site B).
- 1.2 Site A comprises nine existing industrial workshop buildings which have operated as vehicle repair workshops (Use Class B2). Further to the east beyond the railway line is the Maiden Lane Estate. To the south the railway tracks are at a higher level and are expected to be part of the Camden Highline in the future. There are underpasses below the line, some of which are currently closed up, which provide connectivity under the railway. There is a railway overpass that enables pedestrian access across the railways to the east. To the south-east of the site is a wide area of land occupied by railway tracks a concrete plant and industrial buildings accommodating Council services.
- 1.3 To the west of the site is the Agar Grove Estate which is currently being redeveloped. Permission was granted for redevelopment of that estate under planning permission 2022/2359/P (which amended planning permission ref. 2013/8088/P). Buildings are being erected opposite Site A, and the development would form an interface with on-street car parking areas on Wrotham Road.
- 1.4 The existing workshops on site are single storey in height. The yard space around the workshops and wider Camley Street road and footways have historically been used for car parking associated with these uses. These workshops provide 1,289sqm in floorspace.



*Figure 1 - Site plan showing location of the existing buildings*

- 1.5 The area above is covered by a site allocation in the emerging draft Camden Local Plan. The site is located within proposed allocation S5, which is designated for 110 permanent self-contained homes (Use Class C3) and employment activities including light industrial uses, maker space and offices.
- 1.6 The existing Camden Local Plan (2017) identifies the Camley Street area as an area of expected growth and identifies key priorities, including making more efficient and intensive use of land, provide a mix of uses, including new housing and employment floorspace and creating a more vibrant, attractive area.
- 1.7 The Council's adopted Canalside to Camley Street Supplementary Planning Document (SPD) also covers this site and envisages that the area will undergo significant transformation in terms of intensification of the mix of uses and its character and appearance.
- 1.8 The Camley Street Neighbourhood Plan (2021) aims to make the neighbourhood economically vibrant, socially connected, green and safe through transformation into a mixed community providing a range of industrial and commercial spaces, new dwellings, and new social/community infrastructure. The site is within the Camley Street Neighbourhood Plan area.



- 1.9      Vehicular access is provided predominantly from the south, given the significant change in land levels from Wrotham Road and Agar Grove precludes direct vehicle access from the west and north, and railway lines prevent access from the east.
- 1.10     The site is in Controlled Parking Zone (CPZ) CA-N Camden Square, which controls parking between 08:30 and 18:30 Monday to Friday. There are no parking restrictions on other days.
- 1.11     Site A has a maximum Public Transport Accessibility Level (PTAL) of 3 demonstrating a good level of access. The site is accessible to key transport nodes such as Camden Town and Kings Cross via walking and cycling, as well as via public transport.
- 1.12     Site A is not located within a Conservation Area, and none of the buildings on the site are statutorily or locally listed. The nearest conservation area is Camden Square which is 100 metres to the north. London View Management Framework Viewing Corridor 3A.1 (Kenwood viewing gazebo to St Paul's Cathedral) runs north-west to south-east across most of the site. The image below shows the view running across the site.



Figure 2 - LVMF Viewing Corridor 3A.1 (Kenwood viewing gazebo to St Paul's Cathedral)

- 1.13 The site is located within Flood Zone 1, defined as land and property assessed as having less than 0.1% (1 in 1,000) annual probability of river or sea flooding in any given year. It is also within a Local Critical Drainage Area. There is some localised risk of surface water flooding.



*Figure 3 – EA Flood Map showing areas at risk of surface water flooding once in every 100 years.*

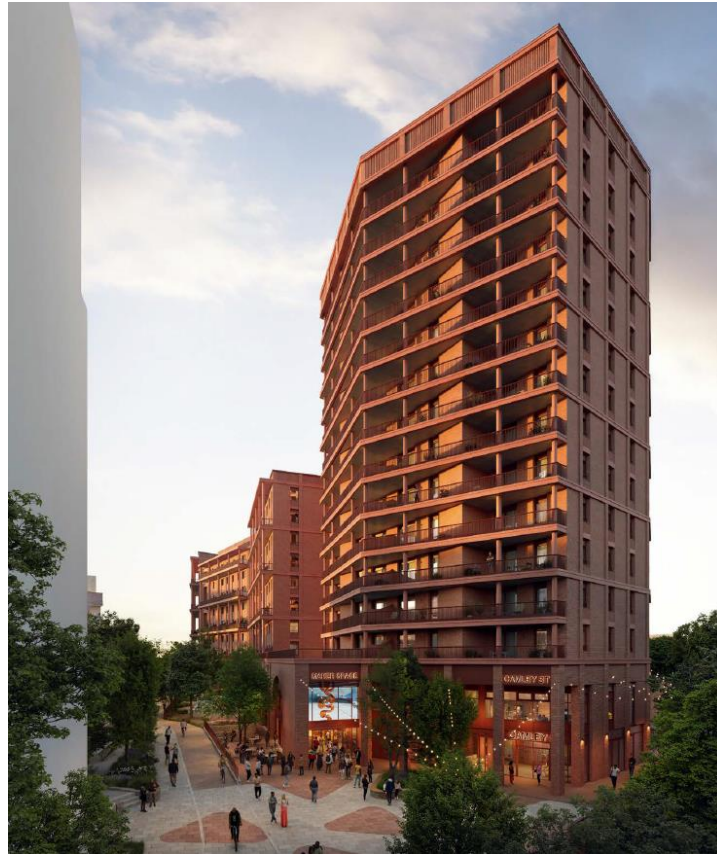
- 1.14 The whole of the borough is defined as an Air Quality Management Area.

**Surrounding Area**

- 1.15 The site adjoins the Central London Activities Zone (CAZ) and the Central London Area (CLA) which extends around the Kings Cross Central site. The Local Plan Growth Area also covers the nearby Kings Cross area.
- 1.16 Other key policy designations nearby include Aggregate Safeguarding and SINC to the south-east and open space designations on the adjacent Maiden Lane, Agar Grove and Elm Village estates.
- 1.17 The surrounding area generally has a residential or industrial characterisation with land to the north, west and east (beyond the railway line) being predominantly residential and the land to the south, beyond the railway lines which border Site A on its southern side and along Camley Street, having a mixed character with residential to the west and industrial uses to the east.
- 1.18 The scale of housing in the area is varied with four to six storey buildings on Agar Grove to the north but much taller buildings on the area of the estate to the west projecting up to 18 storeys. Elm Village to the south-west includes buildings of mostly two to four storeys in height.
- 1.19 The land to the south of the railway line between nos. 104 and 114 Camley Street is also allocated for future development (Site Allocation S6 in the emerging Draft Local Plan) with an indicative capacity of 750 self-contained homes plus employment space. The site allocation S6 indicates that allocations S5 and S6 may potentially be assessed together. Planning permission is also being sought for development on the northern part of site allocation S6 (known as Site B – planning ref. 2025/4364/P) which is to be considered at the same time as this application.
- 1.20 Between Site A and Site B is a single storey industrial unit located immediately south of the railway lines that is not part of this application.

**2. THE PROPOSAL**

- 2.1 The proposals at Site A would deliver an interlinked mixed-use building over three blocks of development including Blocks A1 and A2 (lower ground and ground plus eight storeys – total nine storeys) and A3 (lower ground and ground plus 13 storeys – total fourteen storeys), comprising 119 residential units on the upper storeys and affordable workspace (and ancillary residential) uses on lower ground and ground floors.



*Figure 4 – Image of buildings from south (elevated perspective at railway height)*

- 2.2 All existing buildings would be demolished resulting in the removal of the nine single storey general industrial (Class B2) workshops from the site, currently occupied by car repair businesses.
- 2.3 The 119 new homes would be provided in 100% social rented tenure.
- 2.4 The proposed commercial spaces on site would be creative maker space provided as affordable workspace.

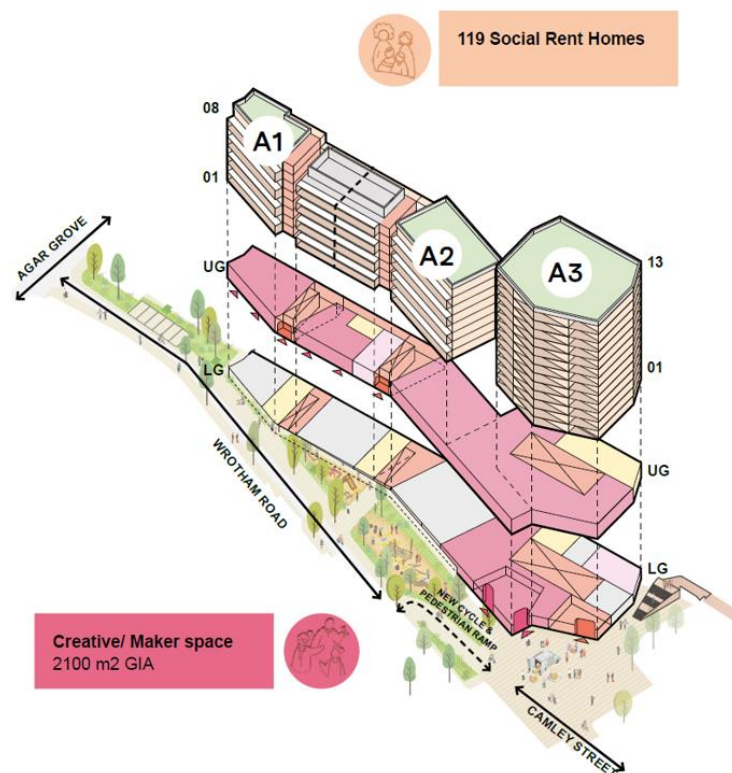


Figure 5 – Isometric image of proposed buildings and podium showing land use distribution

- 2.5 The development would provide improvements to the public realm environment including areas of open space and play space, a new square to the southern side of the site, recalibrated pedestrian and cycle routes and improved lighting.
- 2.6 The development would be car free with accessible vehicle parking only provided both on site and on the adjacent Wrotham Road which is outside the site within the adjacent Agar Grove Estate. High-quality cycle parking would be provided within the buildings and in the public realm.

### 3. APPLICATION CONTEXT AND CONNECTIVITY

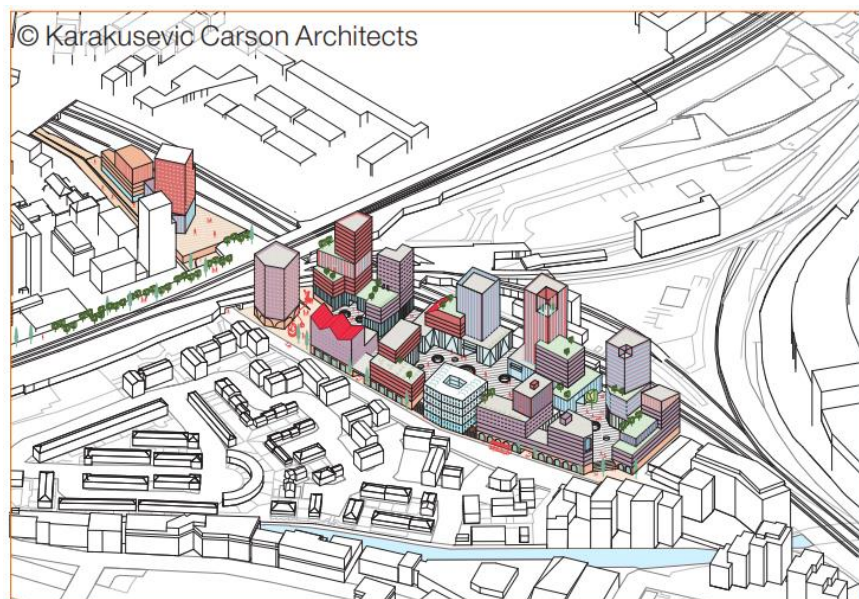
- 3.1 This detailed planning application is for Full Planning Permission and relates to the redevelopment of a single plot of land (Site A). The application is therefore being considered on its own merits and on the basis of the information provided with it against relevant planning policy and legislation in place at the time of submission. Planning applications must be decided in accordance with the development plan unless there are material considerations that indicate otherwise.
- 3.2 Whilst this application is expected to be assessed in accordance with the development plan on its own merits it is relevant to note that it has been submitted alongside a concurrent application at 3-30 Cedar Way (Ref.



2025/4364/P – known as Site B) and it is acknowledged by the Council that these applications are interconnected, though as is set out in the assessment each application is not reliant on the other coming forward for development to be policy-compliant.

3.3 The proposals have instead been developed in the context that the other is expected to be coming forward for development at a similar time and in due course, should planning permission be granted for both applications. The proximity of the sites means there are mutual benefits to be had by designing the development proposals to relate to one other in terms of scale, massing and townscape, and also in terms of land use, split of affordable housing tenures, public realm, vehicle access and play/open space.

3.4 The planning policy context supports this approach as demonstrated by the Camley Street Neighbourhood Plan, the Canalside to Camley Street SPD and the emerging draft Local Plan, which each identify both sites as being suitable for new development and support an approach which secures comprehensive development over multiple sites where this is possible.



*Figure 6 – Illustrative masterplan for the area with view towards north-east as presented in the Camley Street Neighbourhood Plan (2021)*

3.5 The sections in the application assessment below will reference the proposed development for Site B where this is appropriate in order to explain, if necessary, how the development proposals for Site A are acceptable in policy terms in scenarios where either only Site A, or both Site A and B, come forward for development.

3.6 In order to support the comprehensive development of both sites and beyond them into the adjacent parcels of land that are identified as being within the emerging site allocations within the draft Local Plan, an illustrative

masterplan has been provided with both applications that demonstrates how these proposed developments could come forward alongside development for the remainder of the site allocations to achieve their stated aims and objectives (so not jeopardising their future development potential), as well as to demonstrate their accordance with development already approved in the local area such as at Agar Grove Estate and future development projects like the Camden Highline.



*Figure 7 – CGI illustrative masterplan (from north towards Kings Cross station) with Site A to far left of image.*

#### **4. ENVIRONMENTAL IMPACT ASSESSMENT (EIA)**

4.1 A scoping opinion was issued by the Local Planning Authority (LPA) in May 2025. An ES was submitted with the application covering the agreed scope which includes the following key sections:

- Alternatives Considered and Design Evolution
- Proposed Development
- Socioeconomics
- Transport
- Air Quality
- Noise and Vibration
- Wind Microclimate
- Daylight, Sunlight, Overshadowing and Solar Glare
- Climate Change Mitigation and Adaptation
- Water Resources and Flood Risk
- Built Heritage, Townscape and Visual Impact Assessment
- Effect Interactions
- Summary of Mitigation Measures and Residual Effects

- 4.2 The ES considers the impact of the development, both during construction and once completed, along with the cumulative impact of other recent or future schemes in the area, as well as allocated sites. The cumulative schemes considered in the ES includes:

*LB Camden*

- Agar Grove Estate – Draft Site Allocation S21 – Ref. 2013/8008/P
- Land to the North of British Library – Draft Site Allocation S15 – Refs. 2022/1041/P and 2022/1320/L
- 33-35 Jamestown Road – Draft Site Allocation C19 – 2024/4953/P
- Ugly Brown Building, 2-6 St. Pancras Way – Draft Site Allocation S22 – 2017/5497/P, 2021/2671/P and 2021/1239/P
- Belgrove House (and Acorn House) – Draft Site Allocation S12 – 2022/1515/P
- Central Somers Town – Draft Site Allocation S28 – 2019/5882/P
- St. Pancras Hospital – Draft Site Allocation S8 – 2020/4825/P
- St. Pancras Commercial Centre – 2019/4201/P
- Parcellforce and ATS Tyre Centre – Draft Site Allocation S7 – 2020/0728/P
- Bangor Wharf and Eagle Wharf – Draft Site Allocation S10
- Plot F1, Kings Cross Central – 2023/1881/P
- 104 Camley Street, 108-114 Camley Street and Cedar Way Industrial Estate, 3-30 Cedar Way – Draft Site Allocation S6 [includes Site B]
- Camden Town over station development – Draft Site Allocation C17
- UCL Camden Campus – Draft Site Allocation C18
- Arlington Road former depot Site – Draft Site Allocation C19 (in part) – 2024/4953/P
- York Way Depot and adjacent land at Freight Lane – Draft Site Allocation C20
- Camden Cutting – Draft Euston Area Plan Development Principle EAP3
- Amptill & Mornington Crescent Station - Draft Euston Area Plan Development Principle EAP6

*Outside Camden (all Islington)*

- Barnsbury Estate – P2022/1898/FUL
- Land at York Way Estate – P2021/0969/FUL
- Former Holloway Prison – P2021/3273/FUL

- 4.3 Additional information and clarification have been provided through Addendum ES and Non-Technical Summary documents. These documents were subject to further public consultation.



## **5. SHADOW SECTION 106 AGREEMENT**

- 5.1 The planning recommendations for this application are based on certain planning requirements (“Heads of Terms”) being secured in the event of permission being granted. These Heads of Terms would usually be incorporated in a s106 agreement. However, in this case the applicant is the Council and as a matter of law the Council cannot enter into a s106 agreement with itself.
- 5.2 Nevertheless, it is still imperative that this application is dealt with in a way that is consistent with the way the Council would deal with non-Council applications. Therefore, the Heads of Terms will be embodied in a “shadow s106 agreement”. This will take the same form as a “standard” s106 agreement, incorporating the usual legal clauses, and is being negotiated by separate lawyers within the Borough Solicitor’s Department representing the separate interests of the Council as landowner or applicant (the CIP team), and the Council as local planning authority (the Planning team). The obligations of the shadow s106 agreement are also added to the final decision notice as \*\* conditions for transparency.
- 5.3 The shadow s106 agreement will include, among other things, a provision requiring (i) that in the event of any disposal of the relevant land the shadow s106 agreement terms will be included in the terms of the sale transfer and (ii) the purchaser will be formally required to enter into a shadow s106 agreement as owner of the land at the point of acquisition (and hence its terms will thereafter bind the site).
- 5.4 Once the shadow s106 agreement has been finalised, the Executive Director or the Director of Development (for the applicant’s department) will sign a letter formally undertaking on behalf of the department that its provisions will be complied with during the course of the development and its subsequent operation.
- 5.5 The shadow s106 agreement and the Executive Director or Director’s Undertaking of Compliance will be noted on the Planning Register (so the agreement is put on the record in the same way as a “standard” s106 agreement) and compliance with the shadow s106 agreement will be tracked and monitored by the Planning Obligations Monitoring Officers in the Planning Service in the same way as a standard agreement.

## **6. RELEVANT PLANNING HISTORY**

- 6.1 The following sets out the most relevant planning history for the site and the surrounding area.

### ***The application site (Site A)***

- 6.2 No relevant history for this site since the 1980s, other than the recent applications below.
- 6.3 **2025/4252/P**. Prior approval under Schedule 2, Part 11, Class B of The Town and Country Planning (General Permitted Development) Order 2015 (as amended) for the demolition of all existing buildings and associated structures. Prior Approval Required – Approval Given 30<sup>th</sup> October 2025. (includes 3 - 30 Cedar Way)
- 6.4 **2025/0594/P**. Request an Environmental Impact Assessment (EIA) Scoping Opinion under Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) for a mixed-use commercial and residential redevelopment scheme. Scoping opinion granted 29th May 2025. (includes 3 - 30 Cedar Way)

### ***The surrounding area***

#### **3-30 Cedar Way (Site B)**

- 6.5 Various minor alteration applications and change of use applications within industrial-type use classes.
- 6.6 The following planning decisions (advertisement consents excluded) have been made since 2004:
- **2025/4364/P**. Demolition of all existing buildings (Class E and B8) and structures and associated works and erection of new buildings comprising a mixed-use redevelopment of residential (Class C3) and commercial (Class E) uses, together with all landscaping, public realm, cycle parking, car parking, highways works and associated works (SITE B). Pending determination, recommended for approval and also on this committee agenda (Item 2).
  - **2025/4252/P**. Prior approval under Schedule 2, Part 11, Class B of The Town and Country Planning (General Permitted Development) Order 2015 (as amended) for the demolition of all existing buildings and associated structures. Prior Approval Required – Approval Given 30<sup>th</sup> October 2025. (includes 120 - 136 Camley Street)
  - **2025/3197/P**. Installation of a temporary single-storey cabin for engagement purposes and community events (in association with the redevelopment of the wider site), with associated access, hardstanding and 2.4m high site hoarding (rear of Unit 26 Cedar Way). This is currently under assessment.
  - **2025/0594/P**. Request an Environmental Impact Assessment (EIA) Scoping Opinion under Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) for a mixed-use commercial and residential redevelopment scheme.

Scoping opinion granted 29<sup>th</sup> May 2025. (includes 120 - 136 Camley Street)

- **2021/3719/P**. Use of premises for business use (Class E). Granted 13<sup>th</sup> October 2021. (Unit 21-22)
- **2006/2338/P**. Use of the unit as a catering butcher (Class B1). Permission granted 21<sup>st</sup> June 2006. (Unit 28)
- **2006/0463/P**. Change of use of from storage and distribution (Class B8) to light industrial use (Class B1c), and installation of new extract system. Permission granted 2<sup>nd</sup> May 2006. (Unit 9)
- **2006/1092/P**. Certificate of lawfulness for the existing use of the unit as a catering butcher. Permission refused 4<sup>th</sup> May 2006. (Unit 28)
- **2005/3734/P**. Application for a Certificate of Lawfulness for the proposed change of use of the ground floor from storage use (Class B8) to a catering kitchen (Class B1). Permission refused 11<sup>th</sup> November 2005. (Unit 9)
- **2004/4914/P**. Change of use from Class B1 to Class B8 (warehouse). Permission granted 3<sup>rd</sup> February 2005. (Unit 26)
- **2004/1110/P**. A replacement external staircase with a small single storey ground floor extension underneath to contain electrical equipment, new and replacement of windows and doors throughout (PVCu) and the installation of security shutters on openings throughout. Permission granted 15<sup>th</sup> April 2004. (Units 15-24)

#### 1-2 Cedar Way

- 6.7 No relevant planning history.

#### Agar Grove Estate

- 6.8 The redevelopment of the Agar Grove Estate was originally approved under **2013/8088/P** dated 04/08/2014 - Demolition of existing buildings and structures except Lulworth House and Agar Children's Centre (249 existing Class C3 residential units and 2 retail units), and erection of new buildings ranging between 4 and 18 storeys in height along with the refurbishment and extension of Lulworth House to provide Class C3 residential units; a community facility (Class D1); flexible retail shop (Class A1) or restaurant and cafe (Class A3) units; business space (Class B1(a)); 2 flexible retail shop (Class A1), business (Class B1) or non-residential institution (Class D1) units).
- 6.9 Various amendments have been made to the original permission via S73 and S96A applications, the most recent S73 being **2023/0362/P** dated 12/02/2024.
- 6.10 The scheme has now reached phase 4 with approximately 70% of the scheme delivered and half of the dwellings occupied. Travel surveys are currently underway.

### Camley Street Railway Bridge Underpass

- 6.11 **2022/1822/P**. Installation of 10 panels for the display of public art from 01/06/2022. Permission granted 6<sup>th</sup> June 2022.

### Camden Highline

- 6.12 The Council's planning committee resolved, at its meeting on 19 January 2023, subject to the completion of a s106 agreement, to issue planning permission pursuant to planning application reference **2022/2019/P** for Works relating to the Camden Highline 'Phase 1', a high level garden on an existing viaduct, including installation of access stairway at Camden Gardens, creation of access point at Royal College Street, commercial kiosks (within existing arches) (Class E), seating area, pedestrian walkway, event spaces, woodland balcony and ancillary waste and storage facilities.
- 6.13 There is also an associated Listed Building application **2022/2072/L** which was put before the same committee meeting.
- 6.14 However, the completion of the s106 is on hold following issues being raised by a local resident who contended that the proposed development conflicted with the designation of Camden Gardens as a protected square under London Squares Act 1931 (the "1931 Act"). The 1931 Act is a separate legal regime to planning law but can be relevant to planning.
- 6.15 The Camden Highline charity has been giving further consideration as to how it might address any 1931 Act issues and is continuing discussions with the Council. It is expected that any 'updated proposal', would need to be consulted upon by the LPA and then put back to the Planning Committee for further consideration.

## **7. CONSULTATION SUMMARY**

### ***Statutory Consultees***

#### GLA:

- 7.1 Land use principles: The proposed comprehensive redevelopment of the non-designated industrial site for mixed residential and employment uses is accepted in response to London Plan policy E7 having regard to the emerging site allocation. The proposals are supported in response to the London Plan housing supply objectives and the provision of affordable creative maker space is also welcomed
- 7.2 Affordable housing: Delivery of 119 social rent homes is strongly supported in response to the pressing need for this accommodation.

- 7.3 Urban design and heritage: The development design is generally supported. Measures should be secured relating to Agent of Change, inclusive design and fire safety.
- 7.4 Scale, form, massing and architectural quality - Building heights conflict with London Plan policy as the site is not currently identified in the adopted local plan as a site which is suitable for tall buildings, however it is also recognised that the emerging local plan includes the site as a location where tall buildings may be appropriate which is a material consideration. The proposals are well designed and do not raise any specific tall building concerns of strategic significance, although further details relating to solar glare should be secured to ensure impacts to surrounding strategic infrastructure are suitably addressed.
- 7.5 Impacts on strategic views are considered acceptable.
- 7.6 The approach to layout, public realm and landscaping is acceptable in strategic terms. The approach to children's play space provision is accepted despite a shortfall in play space provision on site for each age group, off-site play space opportunities having been demonstrated.
- 7.7 Residential quality is considered good. Agent of Change principle is applicable due to proximity to the railway line and mitigation in relation to noise and vibration required; further details required on the ventilation strategy in relation to the cooling hierarchy
- 7.8 Fire safety and inclusive design. Accessibility and fire safety policies are met.
- 7.9 There are no heritage impact concerns.
- 7.10 Transport: Improvements to the surrounding active travel environment should be secured, with enhancing the Camley Street underpass prioritised, given its central role as a key visual and functional link between the sites, and the proposed use of this section of Camley Street as a cycleway. Improvement of the footbridge to the Maiden Lane Estate is important. Parking strategies are acceptable.
- 7.11 Environment and Sustainable Construction: Further refinement of the energy strategy is required to fully comply with London Plan, including: further exploration of energy efficiency measures for the domestic and non-domestic elements, maximisation of renewable energy, further details on the design of the heat network, and demonstration that the cooling hierarchy has been followed.
- 7.12 Clarification required on the whole-life carbon assessment and circular economy. The urban greening factor score should be improved. Further work required on sustainable drainage including use of stored rainwater to irrigate

green roofs. In terms of air quality a discrepancy with dust risk needs resolving.

GLA Update:

- 7.13 Environment and Sustainable Construction - the majority of matters are now addressed, subject to conditions/obligations where relevant. However, final outstanding comments relating to compliance with the cooling hierarchy (improved ventilation heat recovery efficiency) and improved energy efficiency performance (i.e. inclusion of triple glazing) should be addressed prior to Stage II.
- 7.14 Circular economy - Confirmed that majority of comments addressed. An updated CE spreadsheet and a CE Statement Addendum have been provided and the only remaining element required is the End of Life Strategy, which can be covered by condition.
- 7.15 Whole Life Cycle Carbon - Further response and revision to the WLC assessments and accompanying templates is requested prior to Stage 2 to address final matters.
- 7.16 Air quality - Conditions are recommended relating to Non-Road Mobile Machinery, construction/demolition phase emissions, use of back-up generators and indoor air quality.
- 7.17 Roof irrigation - use of an irrigation system reusing stored rainwater has been discussed further with the design team however implementation of this system would require significant design changes and cost uplift and the applicants consider that biodiverse roofs do not need regular irrigation and an adjacent bib tap for manual irrigation is sufficient for establishment and fire risk mitigation. The GLA recommend measures to implement passive irrigation. In terms of the cost point there is a water environmental incentive offered by Sewerage Undertakers for implementation of rainwater harvesting and greywater recycling/reuse. Matters to be considered at detailed design stage. It is acknowledged otherwise that whilst active rainwater harvesting is not proposed, a range of SuDS proposals are proposed and the proposal seeks to achieve the water consumption targets.
- 7.18 Officer response: *Further commentary on these points is provided in the 'Sustainability and energy', 'Flood risk and drainage' and 'Air quality' sections below. Conditions and shadow S106 obligations will secure further information on these matters as appropriate.*

Historic England

- 7.19 HE advised not necessary to consult.

Historic England (GLAAS)

- 7.20 A pre-commencement (including demolition) two-stage condition is recommended for evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation.

Health and Safety Executive (HSE) (Fire Safety – Gateway 1)

- 7.21 Content with fire safety design of the proposals, to the extent it affects land use planning considerations.
- 7.22 Identified some matters that will need to be addressed ahead of later regulatory stages.
- 7.23 *Officer response: The guidance given by the HSE on fire safety risk around escape routes, EV charging points, mobility scooters, cycle storage, PV and green roofs should be covered by informatives.*

Transport for London (TfL)

- 7.24 The assessment reviewed routes during both day and night and identified several deficiencies against the Healthy Streets indicators.
- 7.25 The Camley Street underpass requires interventions, given its central role as a key visual and functional link between the sites, and the proposed use of this section of Camley Street as a cycleway.
- 7.26 Several obstruction issues have been identified which needs improvement works to paths, lighting etc.
- 7.27 Improved lighting and wayfinding required on footbridge to Maiden Lane Estate.
- 7.28 Further consideration should be given to how the local cycleway will interact with site access, ensuring that movements of cyclists and servicing vehicles are safely managed.
- 7.29 Clear segregation needed between cycle routes and vehicular access points, particularly at the Camley Street underpass and Wrotham Road loading bays.
- 7.30 Cycle hire memberships should be secured for future residents as part of the Travel Plan measures to encourage active travel and reduce car dependency.
- 7.31 Delivery and Servicing Plan to be secured by condition.
- 7.32 Update on Transport for London (TfL) – A meeting took place with the Applicant which focussed on trip generation for Site B (Cedar Way) – nothing further required for Site A.

- 7.33 *Officer's response: The underpass will be subject to feasibility studies to assess improvements that could be made. It is a Network Rail asset and their agreement must be sought. Lighting and wayfinding improvements across the site would be secured by condition. See 'Transport' section for further discussion. Shadow section 106 obligations and conditions will also secure details of cycle and pedestrian path designs, travel plan measures and a DSP with further mitigating measures also secured as appropriate.*

Network Rail

- 7.34 Consultants on behalf of Network Rail and DB Cargo (who are the Europe's largest rail freight operating company) have submitted objections to the application on the grounds that:

- The proposals have the potential to introduce sensitive uses, and which, due to the lack of pre-submission engagement with the rail freight operator, would appear to not have been appropriately nor robustly assessed in the context of noise.
- There are concerns that the timing and duration of noise surveys do not reflect or capture all of the operations.
- This gives rise to the potential that the developments could prejudice the future operation of this important, highly sustainable and expressly safeguarded facility.
- The application and supporting documents should ensure that the local planning authority, when considering whether to grant planning permission does so in the full knowledge of the likely significant effects and takes these into account in the *decision-making process*.
- It is incumbent on the LPA to ensure that the future residents will be protected from significant adverse impacts and that the safeguarded operations the Kings Cross freight site are also protected in accordance with policy requirements at every level. The concerns raised with regards to the assessment undertaken (particularly in noise terms) and the inter-relationship between the application sites and the existing Kings Cross freight site means that this clear requirement is not considered to have been met.
- DBC and NR are keen to work proactively with the Council and the applicant to establish:
  - 
  - a) whether all operations at the freight site have been fully and comprehensively assessed particularly with regards to noise (and if they have not that the opportunity is taken to ensure that *the assessment work is carried out in consultation with DBC/NR*);
  - b) to ensure based on a comprehensive noise assessment that full regard has been had to the future relationship between the new residential development and the existing freight site operations. In this respect that the proposed development is designed, laid out and if



required mitigated so that there is no prospect that it will prejudice the future operation of the rail freight, that 'agent of change' considerations have been fully addressed, and that appropriate living conditions in term of amenity considerations can be assured for the new occupants of the proposed development; and

- c) to agree any noise or other conditions which may be required - again to ensure that the existing and future operations at the freight site are not prejudiced and to ensure appropriate living conditions for future residents.
- There are also separate objections submitted by NR to the use of the railway underpass by a much-increased number of pedestrians and cyclists.

Officer response:

- *Additional noise surveys were conducted in December 2025 and a report submitted which concludes that there is no change to overall conclusions (that mainline rail movements are more significant than freight-related operations) and no additional assessment or mitigation is required. This report has been reviewed by the Council's EHO who has raised no concerns.*
- *The applicant maintains that extensive engagement has been carried out with Network Rail (NR).*
- *A detailed assessment has been submitted indicating how access to the MDU and RAP is maintained.*
- *Planning conditions would need to be imposed which secure appropriate noise mitigation to the residential units close to the railway and an obligation setting out the Agent of Change principle should be included in the shadow S106 legal agreement.*
- *The proposed development would result in a significant reduction in vehicular movements through the Camley Street underpass, including 17 fewer vehicle movements in the AM peak hour (an 80% reduction) and around 350 fewer vehicle movements across the day (a 91% reduction).*
- *Fewer vehicles will use the underpass post-development which significantly improves conditions for pedestrian and cyclists by reducing conflict and freeing up effective capacity within the constrained environment. Although the width of the footway is below TfL's recommendation for new footways, when assessed against TfL Pedestrian Comfort Level (PCL) guidance, the underpass is forecast to continue to operate at PCL A+ in the worst-case peak hour scenario. On that basis, the forecast future scenario is considered on balance to be an overall improvement in safety and user experience compared to existing.*

- *Conditions are to be imposed to ensure protection of NR assets including in relation to signal sighting assessment, construction methodology and boundary fencing and has requested that NR suggest some wording that meet their requirements.*

#### Thames Water

7.35 No objection subject to conditions and informatives on piling, waste and water management.

7.36 Officer response: *Noted and conditions and informatives have been added.*

#### Metropolitan Police (Designing Out Crime)

7.37 No objection to application but recommends the following conditions:

- Prior to construction proof that the plans can achieve secured by design accreditation must be submitted to the design out crime officer and local planning officer.
- For the site to achieve a secured by design accreditation to silver award and to maintain this standard through the life of the development.

7.38 Officer's response: *The proposed development would bring in more active uses, new residents and workers will bring eyes to the street, the scheme also includes active frontages. The improved public realm, pedestrian and cycling facilities will also bring more people to the area providing greater natural surveillance. The design of the public spaces including new lighting will also improve safety in the area. See 'Safety and security' section for further assessment.*

#### Natural England

7.39 No objection.

#### Environment Agency

7.40 No comments to make. Advice given on water resources and waste.

#### Cadent Gas

7.41 No objections; request for informative re. legal rights of access and/or restrictive covenants.

#### National Grid

7.42 No comments received.

#### Sport England

7.43 No comment as outside of outside statutory remit.

Canal and Rivers Trust

- 7.44 Request a S106 contribution of £70,000 (in respect of developments at both Site A and Site B) towards improvement of Regents Canal Towpath due to anticipated significant increase in use by pedestrians and cyclists. This would be a 1.5km stretch between Camden and Kings Cross. They also advise that any lighting to the railway underpass would need to be designed in accordance with the Bat Conservation Trust's Artificial Lighting Guidance.

National Amenity Societies

- 7.45 No comments received.

Islington Council

- 7.46 No objection.

Westminster Council

- 7.47 No objection.

Camden Clinical Commissioning Group

- 7.48 No response.

NHS

- 7.49 no response.

London Healthy Urban Development Unit

- 7.50 No response.

London Fire Brigade

- 7.51 No response.

British Transport Police

- 7.52 No response.

Metropolitan Police Service

- 7.53 See DOCO comments.

***Local groups***

Camley Street Neighbourhood Forum

- 7.54 No response.

Camden Square Neighbourhood Association

- 7.55 In general support of the application; however objects regarding active travel impacts.

King's Cross Development Forum

7.56 No response.

Maiden Lane Tenants Association

7.57 No response.

Regent's Canal CAAC

7.58 No comments received.

King's Cross CAAC

7.59 No comments received.

Camden Broadway CAAC

7.60 No comments received.

Camden Cycling Campaign

7.61 No objection to principle but objects in relation to detailed construction management.

***Publicity***

7.62 Site notices were displayed from 23<sup>rd</sup> October 2025, expiring on 27<sup>th</sup> November 2025. A press advertisement was placed on 30<sup>th</sup> October 2025 in the Ham and High. Re-consultation took place with site notices and press notices on 18<sup>th</sup> December 2025, the consultation running to 18<sup>th</sup> January 2026 due to the submission of an Environmental Statement Addendum.

7.63 7 individual representations have been received further to publicity. Two are in support and one general support with 'slight concerns'. Four are in objection, the main grounds being:

- Impact on local amenity and heritage assets as the scale, height and form of the buildings is inappropriate within context, out of keeping with and fails to conform to local policy.
- Impact on transport in particular active travel; the proposed development will make walking and cycling routes more complex and dangerous specifically around the junction at Agar Grove.
- Conflict with adopted Neighbourhood Plan Core Principle 1 regarding the retention of existing businesses, specifically referenced in clause CS EM2 and also conflict with the London Plan Policies E3, E4 and E7.
- Impact on local amenity and failure to improve public realm in line with local policy and community concerns.
- Lack of play provision
- Overshadowing causing loss of light to local residents.
- Disruption and dust from construction.

- Extra strain on already burdened local services, street cleaning and waste management.
  - Disruption to the local community, would cause obstruction to and interfere with the flow of traffic and public transport.
  - The volume and technical detail contained within the planning application discriminates against large amounts of local residents and would effectively exclude many from participating in the planning process.
- 7.64 The three letters of support refer to the development improving the area and providing much needed homes and commercial space. One welcomes improvements to the important cycle route. A question is raised about cycle parking provision possibly being inadequate.

***Developer-led consultation***

- 7.65 The Applicant carried out engagement activity between 2019 and 2025 to discuss the proposed redevelopment of the sites and the planning applications for Camley Street and Cedar Way. This has shaped the project brief since the early design stages which commenced in 2020 and is set out in a detailed Statement of Community Involvement which is part of the planning application.
- 7.66 This engagement has involved a wide range of participants – residents, local groups and businesses and a fundamental element involved setting up a Steering Group in 2020 and which is still in place.
- 7.67 The Camley Street Steering Group, was formed from residents, local businesses, councillors, institutions, a Young People’s Steering Group (aged 16–25) and community groups including the Neighbourhood Forum, to act as a pre-consultation sounding board on programme design and development matters and as ‘connectors and champions’ within their networks. The group co-designed the Camley Street Vision and, with coaching and guidance, was instrumental in selecting the lead architect. Between 2020 and Autumn 2025, 25 Steering Group meetings or workshops were held. The Steering Group will continue to be a key part of the project engagement strategy as it continues beyond planning submission.
- 7.68 The Applicant has also engaged very closely with the occupiers of existing business premises on both sites and there is ongoing business planning and relocation support.
- 7.69 In addition, consultation has taken place with a large number of stakeholders including the Council as LPA, GLA, TfL and local organisations including schools.
- 7.70 The consultation strategy has been largely led by the Council (as applicant) itself with a dedicated engagement officer alongside an independent

facilitator (Coherent Cities) who manages the Steering Group. Activities across the 2020-2025 period of engagement, included:

- 8,500 printed booklets of engagement material sent direct to local households
- 25 Steering Group workshops
- 34 one-to-ones with stakeholders
- 12 drop-in exhibitions and associated engagement activities
- 10 tag-ons / pop-ups
- 8 youth engagement programmes
- 5 school workshops
- 5 underpass artworks
- 4 Camley Street Festivals
- 2 youth club workshops
- 2 online platforms: Camley Street Instagram and Commonplace
- 1 project specific website
- 1 Camden Disability Action Session
- 1 Camden Special Parents Forum

7.71 The consultation approach undertaken responds to the guidance and requirements identified within the NPPF, as well as the Council's own Statement of Community Involvement and has had a direct and significant impact on how the plans for the sites have evolved.

7.72 Regular engagement has taken place throughout with the Lead Member and Ward Members for Camden Square and Kings Cross, at key milestones, through ward members briefings as well as through their attendance at regular Steering Group meetings, consultation events and workshops.

### ***Camden Cabinet***

7.73 In 2019 Camden's Cabinet approved a regeneration strategy for this site as well as for 3–30 Cedar Way.

7.74 In 2021 a Camley Street Shared Vision was adopted by Cabinet.

7.75 In 2022 the Cabinet approved the delivery strategy ("Camley Street Regeneration Strategy"), including the regeneration business case, selection of a Development Partner, and the Development Agreement for the Cedar Way site

7.76 The Council, acting through its CIP, has consistently supported the principle of the proposed development, and in its capacity as LPA, has sought to advance an allocation for new affordable homes and employment space.

## ***Pre-application Engagement***

### **Design Review Panel**

The emerging master plan and vision for both sites were first presented to the Design Review Panel (“DRP”) on 11th April 2025. The Panel feedback is summarised as follows:

- Support for the masterplan vision and commend the proactive community engagement undertaken.
- Would be beneficial to explore opportunities to redistribute massing and height across both sites. To improve the relationship with the existing homes to the west, the height of tower blocks beside the railway could be increased, and massing lowered elsewhere.
- Improvements to connectivity through the existing tunnels and the quality of the public realm sought.
- The emerging public realm and landscape design is engaging, but more thought is needed to address the needs of different user groups, including adults, children, teenagers, and employees, and the wider community.
- Detail on sustainability and low carbon design is lacking, and the panel strongly recommends further assessment to inform key decisions on layout and orientation, as well as the development of architecture, articulation and materiality. Operational and embodied carbon should be assessed further to address issues including whole life carbon, on-site generation and shared energy networks. Analysis of environmental and microclimate issues should also be carried out, and strategies developed for urban greening, biodiversity, ecology, and sustainable water management.

A second (and final) DRP took place on 13th June 2025, with an updated masterplan presented. The Panel feedback for DRP 2 is summarised as follows:

- The proposed height and massing could be acceptable but should be tested in long views.
- The public realm strategy for Camley Street is impressive, but an approach is also needed that will work if the wider vision cannot be delivered.
- Site A has progressed positively. Heights, form and composition work well, and the introduction of space between Blocks A2 and A3 helps to vary massing.
- The architectural approach has the potential to deliver a beautiful building, and the panel encourages continuing work to refine details. The quality of the arches will be particularly important.
- Residential layouts are promising, but measures should be taken to ensure maker spaces offer a welcoming frontage to residents.

- It is important to ensure the pedestrian overpass to the Maiden Lane Estate has natural surveillance to ensure it feels safe.
- Further thinking is recommended to develop the design of play spaces to add greening and variety. Makers' Yard should be separated into smaller areas to allow more varied use. Evening activation will be important, and the colonnade could help to provide this.
- The energy strategy is supported. An embodied carbon strategy is also needed.

#### Development Management Forum

- 7.77 The proposals were presented to a Development Management Forum on 21st July 2025. Questions focused on a range of matters including scale and height, impact on views, loss of businesses, traffic, noise and construction impact plus public realm and play space.
- 7.78 A post-submission technical briefing for Councillors took place on 28th October 2025.

## **8. POLICY**

### ***National and regional policy and guidance***

[National Planning Policy Framework 2024 \(NPPF\)](#)

[Draft National Planning Policy Framework 2025](#)

[National Planning Practice Guidance \(NPPG\)](#)

#### London Plan 2021 (LP)

[GG1 Building strong and inclusive communities](#)

[GG2 Making the best use of land](#)

[GG3 Creating a healthy city](#)

[GG4 Delivering the homes Londoners need](#)

[GG5 Growing a good economy](#)

[GG6 Increasing efficiency and resilience](#)

[Policy SD10 Strategic and local regeneration](#)

[Policy D1 London's form, character and capacity for growth](#)

[Policy D2 Infrastructure requirements for sustainable densities](#)

[Policy D3 Optimising site capacity through the design-led approach](#)

[Policy D4 Delivering good design](#)

[Policy D5 Inclusive design](#)

[Policy D6 Housing quality and standards](#)

[Policy D7 Accessible housing](#)

[Policy D8 Public realm](#)

[Policy D9 Tall buildings](#)

[Policy D10 Basement development](#)

[Policy D11 Safety, security and resilience to emergency](#)



[Policy D12 Fire safety](#)  
[Policy D13 Agent of Change](#)  
[Policy D14 Noise](#)  
[Policy H1 Increasing housing supply](#)  
[Policy H4 Delivering affordable housing](#)  
[Policy H5 Threshold approach to applications](#)  
[Policy H6 Affordable housing tenure](#)  
[Policy H10 Housing size mix](#)  
[Policy S4 Play and informal recreation](#)  
[Policy E2 Providing suitable business space](#)  
[Policy E3 Affordable Workspace](#)  
[Policy E4 Land for Industry, Logistics and Services to support London's economic function](#)  
[Policy E7 Industrial Intensification, co-location and substitution](#)  
[Policy E11 Skills and opportunities for all](#)  
[Policy HC1 Heritage conservation and growth](#)  
[Policy HC3 Strategic and Local Views](#)  
[Policy HC4 London View Management Framework](#)  
[Policy G1 Green infrastructure](#)  
[Policy G4 Open space](#)  
[Policy G5 Urban greening](#)  
[Policy G6 Biodiversity and access to nature](#)  
[Policy G7 Trees and woodlands](#)  
[Policy SI 1 Improving air quality](#)  
[Policy SI 2 Minimising greenhouse gas emissions](#)  
[Policy SI 3 Energy infrastructure](#)  
[Policy SI 4 Managing heat risk](#)  
[Policy SI 5 Water infrastructure](#)  
[Policy SI 6 Digital connectivity infrastructure](#)  
[Policy SI 7 Reducing waste and supporting the circular economy](#)  
[Policy SI 12 Flood risk management](#)  
[Policy SI 13 Sustainable drainage](#)  
[Policy SI 16 Waterways – Use and Enjoyment](#)  
[Policy SI 17 Protecting and Enhancing London's Waterways](#)  
[Policy T1 Strategic approach to transport](#)  
[Policy T2 Healthy Streets](#)  
[Policy T3 Transport capacity, connectivity and safeguarding](#)  
[Policy T4 Assessing and mitigating transport impacts](#)  
[Policy T5 Cycling](#)  
[Policy T6 Car parking](#)  
[Policy T7 Deliveries, servicing and construction](#)  
[Policy T9 Funding transport infrastructure through planning](#)

[Policy DF1 Delivery of the Plan and Planning Obligations](#)  
[Policy M1 Monitoring](#)

**London Plan Guidance (LPG)**

[Accessible London SPG](#)  
[Planning for Equality and Diversity in London SPG](#)  
[Characterisation and Growth Strategy LPG](#)  
[Optimising Site Capacity: A Design-led Approach LPG](#)  
[Housing Design Standards LPG](#)  
[Affordable Housing and Viability SPG](#)  
[Housing SPG](#)  
[Play and Informal Recreation SPG](#)  
[London View Management Framework SPG](#)  
[All London Green Grid SPG](#)  
[London's Foundations SPG](#)  
[Urban greening factor LPG \(February 2023\)](#)  
[Digital Connectivity Infrastructure LPG](#)  
[Air quality positive LPG](#)  
[Air quality neutral LPG](#)  
[Be Seen energy monitoring LPG](#)  
[Circular economy statements LPG](#)  
[Energy Planning Guidance](#)  
[The control of dust and emissions in construction SPG](#)  
[Whole life carbon LPG](#)  
[Sustainable Transport, Walking and Cycling](#)

***Local policy and guidance***

**Camden Local Plan (2017) (CLP)**  
[Policy G1 Delivery and location of growth](#)  
[Policy H1 Maximising housing supply](#)  
[Policy H4 Maximising the supply of affordable housing](#)  
[Policy H6 Housing choice and mix](#)  
[Policy H7 Large and small homes](#)  
[Policy C1 Health and wellbeing](#)  
[Policy C5 Safety and security](#)  
[Policy C6 Access for all](#)  
[Policy E1 Economic development](#)  
[Policy E2 Employment Premises and Sites](#)  
[Policy A1 Managing the impact of development](#)  
[Policy A2 Open space](#)  
[Policy A3 Biodiversity](#)

[Policy A4 Noise and vibration](#)  
[Policy A5 Basements](#)  
[Policy D1 Design](#)  
[Policy D2 Heritage](#)  
[Policy D4 Advertisements](#)  
[Policy CC1 Climate change mitigation](#)  
[Policy CC2 Adapting to climate change](#)  
[Policy CC3 Water and flooding](#)  
[Policy CC4 Air quality](#)  
[Policy CC5 Waste](#)  
[Policy T1 Prioritising walking, cycling and public transport](#)  
[Policy T2 Parking and car-free development](#)  
[Policy T3 Transport infrastructure](#)  
[Policy T4 Sustainable movement of goods and materials](#)  
[Policy DM1 Delivery and monitoring](#)

#### [Camley Street Neighbourhood Plan 2021](#)

Core Objective 1 Employment  
Core Objective 2 Local Community and Social Needs  
Core Objective 3 Housing  
Core Objective 4 Sustainable Transport  
Core Objective 5 Green Infrastructure  
Core Objective 6 Design Quality  
Policy CS CSN1 Social Infrastructure Provision  
Policy CS EM1 Employment Floorspace Provision  
Policy CS EM2 Retention of Existing Businesses  
Policy CS HO1 Affordable Housing Provision  
Policy CS HO2 Residential Provision in Mixed Use Developments  
Policy DQ1 Responding to Places  
Policy DQ2 Connectivity, Accessibility and Legibility  
Policy DQ3 Proposals for Tall Buildings  
Policy CS GI1 Protection and Enhancement of Existing Open Spaces  
Policy CS GI2 New Open Space Provision  
Policy CS GI3 Promoting Biodiversity  
Policy CS TR1 Managing Industrial Traffic  
Policy CS TR2 Encouraging Walking and Cycling

#### [Supplementary Planning Documents and Guidance](#)

*Most relevant Camden Planning Guidance (CPGs):*

[Access for All CPG - March 2019](#)

[Air Quality - January 2021](#)

[Amenity - January 2021](#)  
[Basements - January 2021](#)  
[Biodiversity CPG - March 2018](#)  
[Design - January 2021](#)  
[Developer Contribution CPG - March 2019](#)  
[Digital Infrastructure CPG - March 2018](#)  
[Employment Sites and Business Premises – January 2021](#)  
[Energy efficiency and adaptation - January 2021](#)  
[Housing - January 2021](#)  
[Planning for health and wellbeing - January 2021](#)  
[Public open space - January 2021](#)  
[Transport - January 2021](#)  
[Trees CPG - March 2019](#)  
[Water and flooding CPG - March 2019](#)

*Camden Conservation Area Statements*

[Camden Broadway](#), adopted February 2009  
[Camden Square](#), adopted March 2011  
[Camden Town](#), adopted October 2007  
[Jeffreys Street](#), adopted November 2002  
[Kings Cross / St. Pancras](#), adopted December 2003  
[Regent's Canal](#), adopted September 2008  
[Regent's Park](#), adopted July 2011  
[Rochester](#), adopted December 2001

*Other guidance:*

[Planning Statement - Intermediate Housing Strategy and First Homes \(2022\)](#)  
[Canalside to Camley Street SPD 2021](#)

Proposed Submission Draft Camden Local Plan (DCLP)

The Proposed Submission Draft Camden Local Plan was submitted to the Secretary of State for Housing, Communities and Local Government on the 3 October 2025 for independent examination, in accordance with Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). The Plan will now be examined by a Planning Inspector.

Previously, the Council published the draft new Camden Local Plan for consultation in January 2024 and published an updated Proposed Submission Draft Camden Local Plan for consultation from 1 May to 27 June 2025.

The Proposed Submission Draft Local Plan (DCLP) is a significant material consideration in the determination of planning applications but has limited

weight at this stage. The weight that can be given to an emerging plan increases as it progresses towards adoption. In line with paragraph 49 of the National Planning Policy Framework (NPPF), the degree of weight to be given is a matter for the decision-maker, having regard to the stage of preparation, the extent of unresolved objections, and the consistency of the draft policies with the NPPF.

*DCLP Draft Site Allocation S5 (120-136 Camley Street)*

The DCLP identifies the site as draft site allocation S5 (120-136 Camley Street). It is allocated for permanent self-contained homes and employment (including light industrial, maker spaces, offices). The indicative housing capacity is 110 additional self-contained homes.

## **9. ASSESSMENT**

9.1 The principal considerations material to the determination of this application are considered in the following sections of this report:

10. PRINCIPLE OF REDEVELOPMENT
11. LAND USE
12. AFFORDABLE HOUSING
13. HOUSING MIX
14. QUALITY OF PROPOSED HOUSING
15. HERITAGE
16. DESIGN
17. IMPACT ON NEIGHBOURING AMENITY
18. MICROCLIMATE
19. LANDSCAPE AND PUBLIC OPEN SPACE
20. TREES, GREENING, AND BIODIVERSITY
21. TRANSPORT
22. SAFETY AND SECURITY
23. FIRE SAFETY
24. AIR QUALITY
25. WASTE AND RECYCLING
26. CONTAMINATED LAND
27. SUSTAINABILITY AND ENERGY
28. FLOOD RISK AND DRAINAGE
29. EMPLOYMENT AND TRAINING
30. HEALTH IMPACT
31. PLANNING OBLIGATIONS
32. COMMUNITY INFRASTRUCTURE LEVY (CIL)
33. CONCLUSION

## **10. PRINCIPLE OF REDEVELOPMENT**

- 10.1 The site is brownfield land, featuring ageing small-scale industrial buildings on an angular plot sandwiched between railway lines and a residential estate. Much of the land is used for storage, access and ad hoc vehicle parking associated with the industrial uses on site. There is a cycle and pedestrian pathway running north-south along the western edge of the site. This is at a raised height compared to the industrial activities which are located at a land level similar to the adjacent railway line, rather than the greater height of Agar Grove to the north which the cycle/pedestrian route connects to.
- 10.2 The site benefits from good public transport access (max. public transport accessibility level (PTAL) of 3) including bus stops on Agar Grove and the international transport node of Kings Cross and St Pancras to the south which is easily reached on foot or by bicycle.
- 10.3 Use of highly accessible brownfield sites for the delivery of new housing is promoted and supported by paragraphs 124-130 of the NPPF 2024 which deals with 'making effective use of land'. Reference is made in paragraph 125(d) to use of under-utilised sites, especially if this would meet housing need and in locations where land supply is constrained. This position is continued in the emerging draft NPPF 2025 which supports making better use of under-utilised land in draft Policy L2.
- 10.4 Camden Local Plan policies are in accordance with the NPPF and draft NPPF in these respects and seek to direct growth to the most sustainable locations.
- 10.5 London Plan policy GG2 states that to create successful sustainable mixed-use places that make the best use of land development must prioritise sites which are well-connected by existing or planned public transport, should promote high-density development through additional homes and workspaces in locations that are well-connected to jobs, services, infrastructure and amenities through public transport, walking and cycling.
- 10.6 London Plan policy D2 says density of development proposals should consider future planned levels of infrastructure, rather than existing levels, and be proportionate to the site's connectivity and accessibility in terms of transport, jobs, and services. LP policy D3 says higher density developments should generally be promoted in areas well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.
- 10.7 The application site benefits from good transport links and therefore it is expected that the site should deliver higher density development.

- 10.8 Policy G1 of the Camden Local Plan (CLP) states 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.
- 10.9 The Camley Street Neighbourhood Plan (CSNP) includes Site A (and Site B) at its northern end, stretching south to Camley Street Natural Park (see below). It was adopted by the Council in 2021 and sets out a vision and objectives for the area, including providing a mix of land uses and new housing that is attainable to local people.

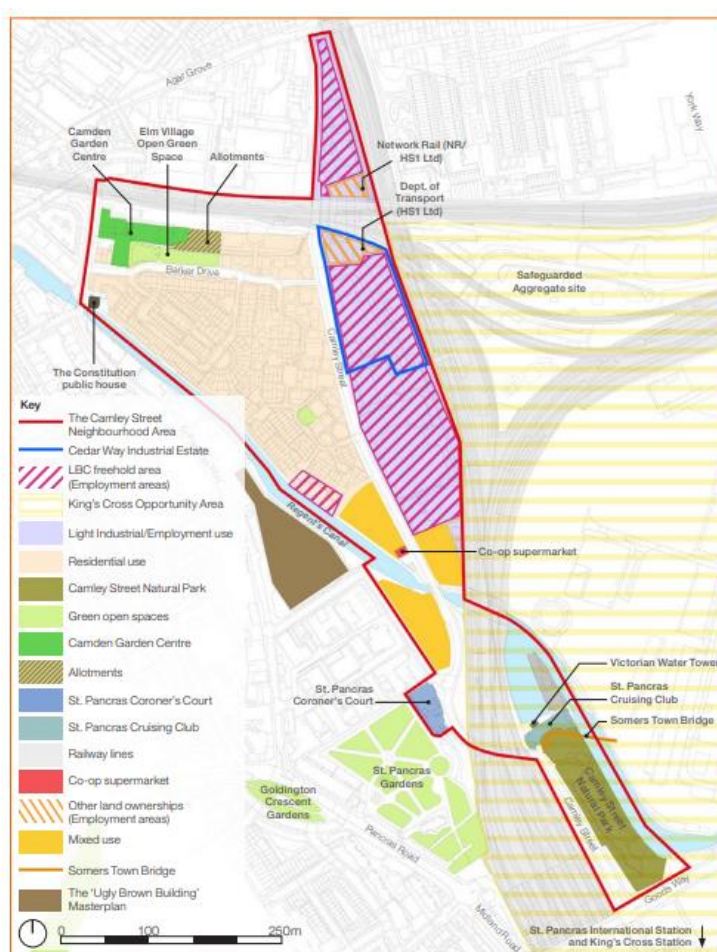


Figure 8 - Extract from the Area Vision for West Kentish Town Estate

- 10.10 Taken as a whole the CSNP aims for the area to mature into a blend of mixed land uses that erodes the segregation that exists between the Elm Village residential area and the industrial estate on the eastern side of Camley Street. Development would secure exemplary workspaces for existing and new businesses and provide a step change in the quality of life for residents by improving mobility, widening the range of goods and services available locally, integrating nature into the built environment and providing new housing suitable for local residents.

10.11 The Council's Canalside to Camley Street Supplementary Planning Document (CCS SPD), adopted in 2021, envisages that the area will undergo a significant transformation in terms of intensification of the mix of uses and its character and appearance. This document builds on policies of the existing Local Plan and sets out some key planning aims and design principles to help shape future development proposals in the area.

10.12 The CCS SPD sets out a series of desirable interventions on a range of sites in the Camley Street area, and in particular state the following for land parcel 'G' at 120-136 Camley Street:

- Improve the pedestrian/cycle link at Camley Street;
- Merge access roads on the Agar Grove Estate and Camley Street to create a new two-sided street with a potential gateway building addressing Agar Grove, improved cycle link and new public realm as part of an enhanced entrance into Camley Street;
- Improved arrival experience under the railway bridge and connectivity into Agar Grove Estate with reference to future community facilities;
- New or improved footbridge deck into Maiden Lane (potentially integrated into Highline proposals);
- Improved footway, lighting and parking enforcement through railway bridge underpass; and
- Facilitate access to potential future Highline route.



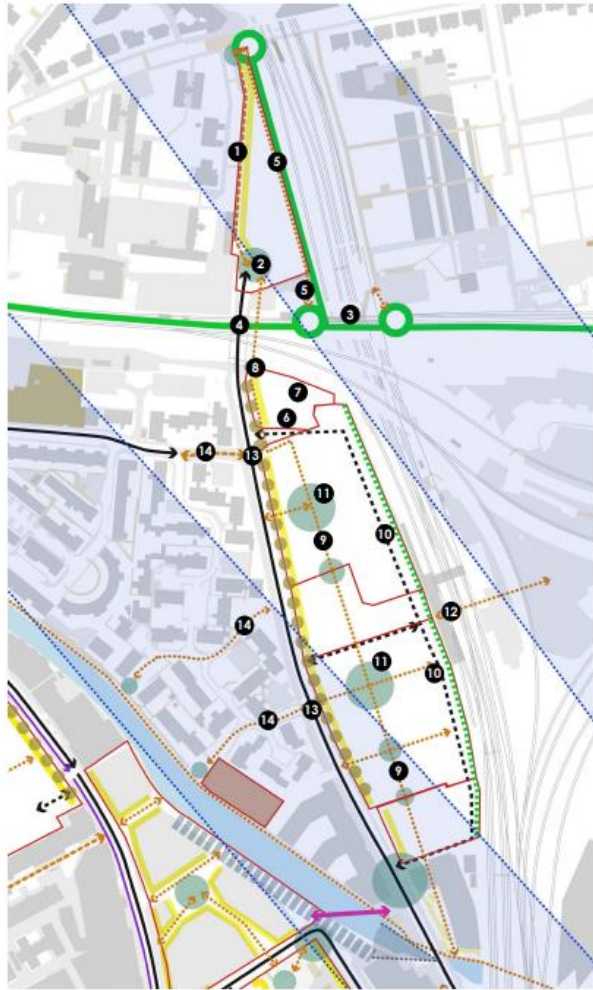


Figure 9 - Extract from the Area SPD

- 10.13 The site is designated as a site allocation in the emerging draft Local Plan. The site forms proposed site allocation S5 '120-136 Camley Street', which is identified for permanent self-contained homes and employment (including light industrial, maker spaces and offices) with an indicative housing capacity of 110 additional self-contained homes.
- 10.14 The draft site allocation sets out the key development and design principles for development at 120-136 Camley Street, which include:
- Take a comprehensive approach to site design and layout;
  - Bring forward co-ordinated development working with other local landowners;
  - Intensify employment floorspace on site with no net loss;
  - Optimise the use of the site through efficient design to enable the co-location of housing, employment and other proposed uses, whilst ensuring that employment uses are not prejudiced;
  - Optimise the provision of additional homes which should form at least 50% of all additional floor area proposed, potentially assessed with the

development of 104-114 Camley Street and Cedar Way Industrial Estate (Site Allocation S6 – which also includes Site B);

- Make provision for particular housing needs identified by Policy H6C (self-build housing and other more specific identified housing needs) where appropriate and consider the inclusion of affordable housing for older people or other people with care or support requirements as a proportion of the additional affordable housing provision;
- Ensure that the design and layout of the scheme mitigate the impact of, and protects the occupiers against, existing sources of noise, air pollution and other nuisance generating activities in accordance with the Agent of Change principles;
- Be designed to minimise the impact of operational vehicles, parking and servicing on existing streets;
- Be designed to create a stronger entrance into the wider area and promote a strong sense of arrival;
- Seek to provide a larger biodiversity corridor to enhance the north London Line SINC at York Way;
- Development should contribute towards public realm and connectivity enhancements along Camley Street to strengthen it as a key route for all cyclists and pedestrians; and
- Development should also contribute towards improved access to bus services on Agar Grove.

10.15 In addition, the Camden Building Heights Study (CBHS, 2024) identified this site as a location where tall buildings may be an appropriate form of development, with 12 to 42 metres considered the potentially appropriate height range.

10.16 The emerging site allocations, although now submitted for examination, have not been through examination in public and holds only limited weight at this time.

10.17 The redevelopment of this brownfield site is therefore strongly supported by national, regional and local planning policy. National and regional policy supports the use of brownfield land in urban areas for high-density mixed-use development where walking, cycling and public transport connectivity is good and there are jobs and services nearby.

10.18 Local planning policy in the form of the Neighbourhood Plan, Canalside to Camley Street SPD and emerging local plan site allocations support redevelopment of this site as part of the comprehensive redevelopment of the wider area along Camley Street and its surroundings.

10.19 The proposed development would meet many of the objectives of these documents including providing a range of significantly intensified employment activities alongside new housing and a suitable mix of

affordable housing. Non-residential land uses would include services and facilities accessible by local residents. Connectivity to and through the site would be improved as would the quality and safety of the public realm onto Camley Street which would become greener and more welcoming.

- 10.20 The proposed development is supported by an illustrative masterplan for the emerging site allocations outside of the application site which demonstrates that future development on those land parcels (including Site B at Cedar Way Industrial Estate and other plots of land further to the south within site allocation S6) will contribute to achieving the wider aims of the emerging local plan, the CSNP and CCS SPD in a collaborative and co-ordinated manner. See below illustrative image of potential future development in the area with Site A to left (and Site B centrally).



*Figure 10 – Illustrative masterplan of site A and B and potential future development*

- 10.21 Given the above, the principle of demolition and the provision of high-density mixed-use development on this well-connected site is considered acceptable in principle, subject to environmental and all other relevant considerations as discussed in the sections below. The acceptability of the density of the development is informed by conservation, design, amenity and other relevant issues as part of a design-led approach, and these matters are also assessed in turn in the report below.

## **11. LAND USE**

- 11.1 The current uses on the site are as follows:

### ***Existing floorspace***

<b>Existing use</b>	<b>Floorspace (GIA)</b>
Car Repair Workshops (Use Class B2)	1,289sqm

*Table 1 – existing floorspace*

- 11.2 The proposed floorspace is as follows:

### ***Proposed floorspace***

<b>Proposed use</b>	<b>Floorspace (GIA)</b>
Affordable Makerspace (Use Class E(g))	2,119sqm (13%)
Affordable Residential (Use Class C3)	13,927sqm (87%)
<b>Total</b>	<b>16,046sqm</b>

*Table 2 - Proposed floorspace*

### ***Loss of industrial uses – Class B2***

- 11.3 Policy E4 of the London Plan states that current and future demand for industrial land in London should be provided and maintained. Policy E7 states that mixed-use proposals on non-designated industrial sites should only be supported where the land has been allocated for alternative mixed-use development through a plan-led process.
- 11.4 The Local Plan states in paragraph 2.69 that the current employment premises fail to make the best use of land. Policy E1 of the Local Plan states that the Council will support businesses of all sizes including small and medium-sized enterprises. Policy E2 of the Local Plan states that the Council will encourage the provision of employment premises in the borough and will protect premises and sites that are suitable for continued business use. Development of business premises will be resisted unless the site is no longer suitable for its existing business use and that the possibility of retaining, reusing or redeveloping the site for similar or appropriate alternative uses has been fully explored.
- 11.5 Core Objective 1 of the CSNP states that development will ensure the neighbourhood's existing employment function will continue, including supporting its role as a place with a rich and diverse mix of light industrial businesses. Policy CS EM1 states that development proposals of existing employment sites should ensure that employment space on site is retained or increased, should ensure that a proportion of new employment floorspace in major development proposals would meet the operational requirements of industrial-type end uses and provide space for micro and small to medium-sized enterprises (SMEs), should consider providing start-up and move-on

commercial space and should ensure that some of the employment space is provided at affordable rents.

- 11.6 Policy CS EM2 of the CSNP requires premises and sites in existing business use in the Camley Street area to be protected and uses retained on site where possible.
- 11.7 Policy IE3 of the draft Local Plan states that the Council will manage and protect the supply of industrial land in the borough, whilst recognising the opportunity for some sites to be used more efficiently to deliver economic and wider plan objectives. This policy also acknowledges that site allocations in the plan identify opportunities to intensify industrial sites in the borough.
- 11.8 The emerging site allocation S5 allocates the site for mixed-use development including residential and employment uses such as light industrial, maker space and office use. It requires employment floorspace on site to be intensified with no net loss of floorspace, with the use of the site to be optimised through efficient design to enable the co-location of housing, employment and other uses as necessary.
- 11.9 Site A is currently underutilised by the existing single storey car repair workshops and associated yard and service spaces. Much of the land is used for informal car parking and storage associated with these businesses, which obstructs pedestrian and cycle movements to the north/south and over the railway line to the east via the Maiden Lane overpass.
- 11.10 The industrial buildings on Site A are in poor condition and the constrained site is inappropriate for the current uses, as demonstrated by the car parking and storage that spills out onto the surrounding streets. The limited space available for the existing uses therefore causes knock-on negative impacts to the local environment both visually and in terms of safety and security.
- 11.11 The Council's economic needs assessment (December 2023) indicates that demand for industrial space in Camden is expected to decline. It is also important to note that this site is not formally designated as strategically important or locally significant industrial land in the London Plan and as such the existing uses are not deemed sufficiently critical to the operation of business activities in London to necessitate their retention.
- 11.12 The site is designated for mixed-use redevelopment in the emerging draft Local Plan and the existing Local Plan also identifies the site as failing to make the most efficient use of the existing land. As such, due to the poor quality of the existing industrial units, their inefficient use of land in terms of low floorspace quantum and the relatively small number of jobs on site, the lack of suitability of this site for those uses given the relatively small and constrained nature of the site, close proximity to key cycle and pedestrian routes and siting within a predominantly residential neighbourhood, the lack



of long-term demand for industrial space in this area and the lack of strategic or local need for industrial space in this location, it is considered that removing the industrial uses from the site entirely is acceptable in principle.

- 11.13 It is noted that many of the policies above suggest that industrial uses, including existing businesses where appropriate, should be re-provided in any future redevelopment of the site. However, given the typology of the existing uses and industrial uses in general which generally require a large floor area, significant amounts of service and yard space and offer relatively low levels of employment, it is considered that re-providing such uses would fail to optimise mixed-use development on site, a key requirement of the emerging draft site allocation which is being prepared through a plan-led process as required by Policy E7 of the Local Plan, by placing limitations on the amount and intensity of employment space that could be provided on site, and by limiting the amount of housing that could be provided at the site as well.
- 11.14 In terms of protecting the interests of existing business, as required by neighbourhood plan policies, the Council's CIP team (the applicant for Site A) has engaged an organisation named Tree Shepherd, which is a registered charity providing business support services, to support existing occupiers with growth of their affected business in new more suitable locations.
- 11.15 Therefore, it is considered that the loss of industrial uses at the site is acceptable in accordance with London Plan, Local Plan and emerging draft Local Plan requirements. Compliance with the CSNP is also secured through the efforts made to retain existing businesses on site and the provision of affordable workspace within the proposed development, which is discussed in the sections below.

***New affordable makerspace – Class E(g)***

- 11.16 Policy E3 of the London Plan states that affordable workspace at rents below the market rate may be secured for activities such as creative workspaces and makerspace to help sustain a mix of businesses which contribute to the character of an area.
- 11.17 Policy E2 of the Local Plan states that higher intensity redevelopment of business premises will be considered provided that the employment floorspace is increased and managed affordable workspace for SMEs and start-ups is provided where viable.
- 11.18 The CSNP aims to secure affordable workspace for a range of small businesses and start-up companies. Policy CS EM1 of the CSNP states that development proposals should increase and intensify existing employment areas and should ensure that a proportion of the employment space is provided at affordable rents, where viable, with support provided by a specialist provider.

- 11.19 Policy IE4 of the draft Local Plan states that where affordable workspace is secured the Council will expect the applicant to submit an operating plan setting out the model of affordable workspace, sectors to be targeted and details of management of the workspace. Site allocation S5 in the draft Local Plan confirms that maker space is an allocated use for the site.
- 11.20 The proposed development would secure an increase in commercial floorspace on site of 830sqm. This is provided in the form of 2,119sqm of creative maker space. The Use Class of this space would be Clase E(g) to allow maximum flexibility with end users across a range of office, research/development and light industrial activities. 100% of the workspace on Site A is provided as affordable with a 'Category A' fit out and a 40% discount on market rates for 10 years. The site is expected to provide studios that reflect the creative heritage of Camden, and which build on the local Knowledge Quarter designation as well as offering symbiotic benefits to the emerging development on Site B (if granted permission) which is expected to provide more science and technology-based workspace accommodation.



Figure 11 - creative maker space (akin to light industrial)

- 11.21 The spaces are designed to be flexible for use as larger units for light industrial making-type activities or smaller artist studios. The final mix of uses will be secured with recognition of the surrounding residential neighbourhood, limitations with regards to hours of use and servicing arrangements, plus with an ambition to ensure symbiosis with residential occupiers on Site A and with respect to Site B as well. To ensure that a workspace provider will be managing the site this management, and the discounted rents, will be secured through Shadow Section 106 legal agreement.

11.22 In terms of jobs, the creative makerspace is expected to result in an increase in employment on site, with employment density assumptions as provided by the London Employment Database (2021) estimating 36 employees in the existing industrial units and 78 users of the proposed Class E(g) affordable units.

11.23 Therefore, it is considered that the replacement of industrial space with creative maker space meets the requirements of regional, local and emerging planning policy including the emerging draft site allocation, and is acceptable in principle in land use terms, subject to legal agreement.

### ***Residential use – Class C3***

11.24 London Plan policy H1 seeks to increase housing supply and meet the borough's housing targets. Camden's target for net housing completions from 2019/20 to 2028/29 is 10,380. London Plan Policy H1 says boroughs should deliver the housing by optimising the potential for housing delivery on all suitable and available brownfield sites, especially through:

- sites with existing or planned PTAL levels of 3-6 or which are located within 800m distance of a station or town centre boundary;
- Intensification on other appropriate low-density sites in commercial uses;
- Redevelopment of public sector owned sites; and
- Non-designated industrial sites identified through a plan-led process such as through allocation in a local development plan document.

11.25 Policy H4 of the London Plan requires developments on public sector land to deliver at least 50% affordable housing.

11.26 Camden Local Plan policies H1, H2, H4, H6, H7 and Camden Planning Guidance (Housing) are relevant to the provision of housing, including affordable housing. Residential use is the Council's priority land use and is strongly supported in principle throughout the borough. An affordable housing target of 50% applies to all developments with the capacity for 25 or more dwellings. Residential developments should provide a mix of accommodation which meets identified housing need.

11.27 The Housing Delivery Test (HDT) is an annual measurement of housing completions introduced by the government. It measures whether development plan requirements (or, in some cases, local housing need calculated by the government's standard method) have been met over the last 3 years. The government's most recently published figure is for 2023, when the government's measurement for Camden was 53% - which means that Camden's development plan policies are treated as being out-of-date in relation to housing provision.

11.28 The presumption in favour of sustainable development in paragraph 11(d) of the NPPF is therefore engaged, and great weight should be given to the



provision of housing in decision making. The NPPF indicates that applications should be granted unless their adverse impacts would significantly and demonstrably outweigh their benefits when assessed against NPPF policies as a whole.

- 11.29 The proposed development on Site A includes the provision of 13,927sqm (GIA) of residential floorspace which is 87% of the proposed floorspace. This equates to 119 new homes. All these homes would be provided in social rented tenure. Details of the mix of this accommodation are provided in the 'Housing mix' section below.
- 11.30 Policy H8 of the Local Plan aims to ensure there is a supply of specialist housing to allow people needing support to live as independently as possible. Draft site allocation S5 also requires the provision of specialist housing on site if possible. The desire to accommodate specialist housing on the site is acknowledged. However, in order to meet planning policy targets for affordable housing on site and noting the need to optimise development the proposals is unable incorporate additional housing tenures as it would lead to excessive levels of design and management inefficiencies.
- 11.31 The proposed development would deliver a significant amount of housing to help meet the borough's housing needs. It achieves this by optimising the floorspace on low-density non-designated employment land accessible from a range of public transport options, and which is allocated for new mixed-use development in the Council's emerging Local Plan under site allocation S5.
- 11.32 The supply of new housing and the principle of housing on the site therefore complies with policy. Taking account of the Council's position with regards to its housing land supply and performance against the Housing Delivery Test, significant weight has been attached to the delivery of this housing, and in particular to the policy-compliant proportion of 87% of floorspace as affordable housing which has the greatest need in the borough and is therefore the highest priority land use. Tenure and unit size mix are dealt with in the 'Affordable housing' and 'Housing mix' sections below.

### **Conclusion**

- 11.33 The provision of 119 affordable homes is strongly welcomed and, taking account of the development plan priorities and the NPPF, it should be given significant weight in decision making. Provision of 2,119sqm of commercial space in the form of affordable makerspace supports the local economy and adequately replaces and intensifies employment activity from the existing industrial units (as well as being more compatible with new homes and supporting SMEs) the subject to planning obligations securing its proposed rental discounts and ongoing management. The proposals are therefore acceptable in land use terms, prioritising the provision of new housing and

intensified employment space in a sustainable location in accordance with site allocation S5 of the emerging draft Local Plan.

## **12. AFFORDABLE HOUSING**

### ***Affordable housing requirements***

- 12.1 London Plan policies H4, H5 and H6 set out the Mayor's targets for the provision of affordable housing and tenure priorities. Applications on public sector land should deliver 50% affordable housing and where this is secured applications are able to follow the fast-track approach to viability where no viability assessment is required to be submitted.
- 12.2 Camden Local Plan policies H1, H2, H4, H6, H7 and Camden Planning Guidance (Housing) are all relevant as they set out the Council's approach to considering applications for new housing, including priorities for tenure and unit size.
- 12.3 CLP policy H4 confirms an affordable housing target of 50% applies to sites with a capacity of 25 or more additional homes. The guideline split of the affordable housing provided is 60% social-affordable rent and 40% intermediate rent.

### ***Affordable provision and tenure split***

- 12.4 The proposed development would deliver 87% of the floor space on site as affordable housing which is considered acceptable as discussed above. All affordable housing would be provided as social rent tenure. This is not consistent with the guideline tenure split as stated in Local Plan Policy H4 which requires 60% social affordable rent and 40% intermediate rent tenures.
- 12.5 However, the mix as shown in the policy is a guideline only and several factors must be taken into account when considering whether a proposed housing mix is acceptable, including the character of the development, the policy requirement to optimise the overall amount of development, and whether an alternative approach could better meet the objectives of the development plan.
- 12.6 Social rented accommodation is the tenure priority in Camden and represents the most pressing housing need. The applicant has prioritised social rented tenures when re-developing on its own land with the wider ambition of accommodating those on the Council's housing needs waiting list that are in most need of new housing. This approach helps to support the most vulnerable members of the community, helps to address inequalities in line with the We Make Camden vision and also helps to meet the wider objectives of the development plan.

- 12.7 The lack of intermediate rented homes within this proposed development on Site A is also partially mitigated by the proposed development for Site B which, subject to planning permission, would provide 79 intermediate rent as well as 203 market sale homes. The proposed developments at sites A and B are linked through a development agreement and are expected to be delivered at a similar time. In the event that Site B also secures planning permission and both sites are built out the sites combined would secure the following housing mix.

<b>Tenure</b>	<b>Homes</b>	<b>GIA (sqm)</b>	<b>Hab. rooms</b>
<i>Total homes (both sites)</i>	<i>401</i>	<i>42,449</i>	<i>1,251</i>
Affordable homes (both sites)	198	21,103	645
Social-affordable rent (Site A)	119	13,927	446
Intermediate rent (Site B)	79	7,176	199
Market (Site B)	203	21,346	606
<b>% affordable</b>	<b>49%</b>	<b>50%</b>	<b>52%</b>
<b>Social/intermediate split</b>	<b>60:40</b>	<b>66:34</b>	<b>69:31</b>

*Table 3 - Tenure by homes, floorspace, and hab rooms*

- 12.8 Across both sites there would be a policy-compliant mix of homes in terms of the affordable tenure split. Whilst there is a weighting towards social rented homes across both sites when considering affordable GIA and habitable rooms provided, this is supported noting the wider need and benefits of social rented accommodation as explained in the paragraphs above. Furthermore, a diverse range of housing typologies is provided in the wider surrounding area, means the risk of creating an unbalanced community in the locale is sufficiently mitigated in this instance.
- 12.9 The distinct development economics of the affordable sector also favour a focus on social affordable rented homes, because current grant funding prioritises social affordable rent over intermediate products.
- 12.10 Therefore, given the significant need in the borough for social rent accommodation as evidenced by the Council's housing waiting list and noting the proposed broader provision across both Sites A and B which are expected to come forward for development at a similar time, as well as noting the broader mix of housing tenures in the wider local area, it is considered that providing the affordable housing entirely in social rent tenure is acceptable in this case. The GLA strongly supports this approach and is also in agreement that the fast-track approach to viability can be followed in this instance.

### 13. HOUSING MIX

- 13.1 CLP policy H7 requires developments to include a mix of homes of different sizes. All developments should include some large homes (with 3-or-more bedrooms) and some smaller homes and should contribute to meeting the priorities set out in the Dwelling Size Priorities Table in this policy. Policy H7 also indicates that the Council will apply the priorities flexibly having regard to a range of criteria relating to the characteristics of the location and the development. CLP supporting text in paragraphs 3.197 to 3.199 discusses the need in the borough for large homes. However, paragraph 3.201 recognises that the rigid application of dwelling size priorities can prejudice the financial viability of a development and will consider adjusting the mix of dwellings (particularly the mix of market dwellings) to achieve the maximum reasonable amount of affordable housing floorspace on the site.
- 13.2 Draft Policy H7 of the emerging draft Local Plan takes a similar approach, though acknowledges over time the demand for one-bedroom market homes has increased and demand for two-bedroom homes has decreased since the Local Plan was published.
- 13.3 The Dwelling Size Priorities Table is reproduced below.

Tenure	1 bed or studio	2 bed	3 bed	4 bed +
Social-affordable rent	lower	high	high	medium
Intermediate	high	medium	lower	lower
Market	lower	high	high	lower

*Table 4 - Camden Local Plan Policy H7 – Dwelling Size Priorities*

- 13.4 The Council's Housing CPG (adopted 2021) sets out more detail about the dwelling size priorities. In relation to social-affordable rent homes, the CPG requires a minimum of 30% of all social rented homes provided to have three bedrooms or more, and for 20% to have four bedrooms where possible. Where 20% four-bedroom homes cannot be provided the CPG requests that the target for three-bedroom homes is increased proportionally up to 50%. For smaller homes, the aim of CPG is for 35% to have two bedrooms and no more than 15% to have a single bedroom.
- 13.5 The proposed unit sizes for the social rent affordable homes proposed on Site A are as follows:

Size	Homes	%	Hab. Rooms	%
1-bed	25	21%	50	11%
2-bed	51	43%	165	37%

3-bed	27	23%	135	30%
4-bed	16	13%	96	22%
<b>Total</b>	<b>119</b>	<b>100%</b>	<b>446</b>	<b>100%</b>

*Table 5 - Proposed mix of housing*

- 13.6 The mix of homes does not meet the Housing CPG's stated target provision of 50% of all social rent tenure homes to be provided as family-sized (three and four bedroom) homes by unit (36%) however it is notable that 52% of the habitable rooms within the proposed development would be for larger family-sized dwellings. The greatest proportion of dwellings both by unit and by habitable room is for two-bedroom units and it is noted that this would contribute towards meeting the high (in the current Local Plan) to medium (in the draft Local Plan) demand for two-bedroom social-affordable rent units in the borough.
- 13.7 Overall, the scheme provides a balanced mix of affordable homes, suitable to the location and contributing to the identified needs in the development plan, in accordance with CLP policy H7.

#### **14. QUALITY OF PROPOSED HOUSING**

- 14.1 CLP policy H6 is about housing choice and mix, and it aims to minimise social polarisation and create mixed, inclusive, and sustainable communities, by seeking high quality accessible homes and a variety of housing suitable for Camden's existing and future households.
- 14.2 In line with LP policy D6 and CLP policies H6 and D1, housing should be high quality and provide adequately sized homes and rooms and maximise the provision of dual aspect dwellings. CLP policy A1 seeks to protect the amenity of occupiers in relation to a number of factors, including privacy, outlook, light, and noise. CLP policy A2 seeks provision of private amenity space which is reflected in LP policy D6. CLP policy A4 says suitable noise and vibration measures should be incorporated in new noise sensitive development.
- 14.3 LP policy D5 says development should provide the highest standard of accessible and inclusive design, which allows them to be to be used safely, easily and with dignity by all, which is also reflected in CLP policies D1, H6, and C6.
- 14.4 LP Policy D13 refers to the Agent of Change principle and states that new developments should be designed to ensure that established noise and other nuisance generating uses remain viable and can continue or grow without unreasonable restrictions needing to be placed upon them.

### ***Daylight***

- 14.5 The leading industry guidelines on daylight and sunlight are published by the Building Research Establishment in BR209 'Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice' (third edition, 2022) (BRE). The development plan supports the use of the BRE guidance for assessment purposes, however, it should not be applied rigidly and should be used to quantify and understand impact when making a balanced judgement.
- 14.6 An Internal Daylight, Sunlight and Light Intrusion Report by DPR has been submitted with this application. It summarises and applies the relevant guidelines to the proposed units on Site A. This has been reviewed for the Council by an independent third-party assessor at Lichfields Planning and Development. Lichfields raise no objections to the methodologies used in the report.
- 14.7 Daylight assessments have been undertaken using the Daylight Illuminance (SDA) tests. These tests use local climatic data, internal reflectance values and external reflectance values within the calculations. The SDA assessments show that 952 (80%) of the 1194 rooms assessed across both proposed developments for Sites A and B will meet the UK Annex targets for daylight which is a good level of provision. Study of the Illuminance plans shows that the majority of transgressions occur within Site A, where the compliance figure reduces to 60% of 426 rooms tested within the proposed development on that site.
- 14.8 An analysis of the form of the building on Site A and the results shows that the transgressions generally result from the façade treatment of the buildings. The proposed buildings A1-A3 include external accessways and projecting balconies which creates restrictions in daylight amenity. Whilst these features can reduce daylight penetration, they also perform important roles in the overall design strategy. Deck accesses act as buffer zones which help to separate living spaces and provide screening from sources of external noise which reduces the direct transmission of noise into habitable rooms. Decks and balconies also help to reduce overheating. In the case of this development, wider decks would be provided that include passing space for families with buggies and wheelchair users.
- 14.9 Furthermore, the maisonette apartments in buildings A1-A3 have been designed with wider, shallower living rooms to support a more even distribution of daylight across the space, which helps to mitigate the limiting effect of the balcony and deck-access overhangs, while also promoting good quality liveable homes.
- 14.10 Many of the limitations are to bedrooms which are not considered overly significant as these rooms are not main habitable rooms of the homes.

- 14.11 Restricted daylight amenity to some dwellings is common within urban sites and the local area is becoming more urbanised as the Agar Grove Estate redevelopment scheme, which includes a 19 storey tower opposite the site, emerges.
- 14.12 As such, given the increasingly urbanised nature of the local area and noting the detailed design of the buildings on Site A which are of a deck-access typology to reduce noise impacts from the adjacent railway line, a reduced level of daylight for these proposed homes is considered acceptable in this case.

### ***Sunlight***

- 14.13 The BRE guidance recommends that an interior space should receive a minimum of 1.5 hours of direct sunlight. It recommends that at least one habitable room per dwelling should meet these conditions. The main requirement for sunlight is in living rooms. It is considered less important in bedrooms and kitchens.
- 14.14 The proposed buildings are generally laid out on a north-south axis which minimises the number of windows facing due south and as such necessarily limits access to sunlight through the development's orientation. Of the 119 dwellings in the development 94 have at least one window facing within 90 degrees of due south (79%). All other dwellings are technically unable to meet the sunlight guidance by virtue of their siting and orientation and are therefore discounted from this assessment.
- 14.15 Of the remaining homes 65% would have at least one room meeting the BRE guidance and 61% of these would have BRE-compliant sunlight levels to main living rooms. Whilst not all units provide rooms that meet the recommended sunlight targets overall it is considered that a high proportion of units have main living rooms with the recommended levels of sunlight, given the urban location of the site.

### ***Overshadowing***

- 14.16 The BRE guidance recommends that at least 50% of the area of any of the amenity spaces should receive at least two hours of sunlight on 21 March. The overshadowing assessments show all spaces will comply with the BRE guidance.

### ***Layout and amenity space***

- 14.17 Part of the design-led approach to delivering effective high-density housing is about ensuring the development does not compromise the size and layouts of homes, ensuring high-quality housing across the scheme. CLP policy H6 confirms that new residential development should conform to the Nationally Described Space Standards, and this is reflected in LP policy D6

which sets the same minimum space standards in Table 3.1. The relevant excerpt from the table is reproduced below in Table 6 below.

Type of dwelling		Minimum gross internal floor areas* and storage (square metres)			
Number of bedrooms (b)	Number of bed spaces (persons(p))	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
1b	1p	39 (37) *	N/A	N/A	1
	2p	50	58	N/A	1.5
2b	3p	61	70	N/A	2
	4p	70	79	N/A	2
3b	4p	74	84	90	2.5
	5p	86	93	99	2.5
	6p	95	102	108	2.5

*Table 6 - Minimum internal space standards (London Plan Table 3.1, Policy D6)*

- 14.18 All the proposed homes meet or exceed the minimum internal and external amenity space requirements with all flats having access to a balcony or terrace. The new homes would have good floor to ceiling heights (2.5 metres minimum) and good room sizes. They are well laid out with a simple and rational plan form in both maisonette and apartment typologies available. The larger family-sized maisonette units would have separate kitchen and living areas and are accessed directly off of the gallery access circulation area which has been widened to allow for passing spaces for buggies and wheelchairs.
- 14.19 More than 70% of the dwellings would have dual aspect, improving access to light, ventilation and views for occupiers of these flats. Only the one-bedroom apartments in Block A3 would be single aspect. All homes of two or more bedrooms would be dual aspect.
- 14.20 Double height communal gallery access spaces connect each maisonette with both lift cores. Natural light can permeate into these galleries easily. The flats provided in Block A3 are more typical flats with corner balconies designed to provide simple yet flexible living arrangements.
- 14.21 Site A includes three cores across the three blocks which are housed within a single building.

### **Noise and vibration**

- 14.22 The proposal is for mixed-use development with creative makerspace proposed at ground floor to replace the existing industrial spaces on site. It is expected that during daylight hours there could be an element of noise associated with these uses, given the processes involved in the making of



products. However, this is expected to be reduced compared to the noise from works and vehicles associated with the existing vehicle garages on site due to the provision of updated building fabric materials and the anticipated mix of end uses which is expected to include a range of operations including non-noise generating activities such as office-type uses. Furthermore, surrounding the site there are other potentially activities that could potentially be disturbing to new residents on the site, including noise from moving trains to the east and south of the site, road noise to the north and, further to the south-east, noise and dust from the industrial uses on the safeguarded aggregate site on Freight Lane.

- 14.23 It is relevant to note that the railway lines in this area, particularly those to the east of the site, are understood to be often used by diesel vehicles for engineering purposes and there is a vehicle ramp immediately north of Site B which is safeguarded to allow track access for large vehicles associated with railway maintenance and engineering.
- 14.24 Furthermore, the land within Site A north of the east-west railway lines is expected to be used as a yard, and there are ambitions to open up arches under the railway viaduct in this area for commercial and access purposes, whilst the Camden Highline is expected to be established in this area in the near future.
- 14.25 As such, the proposed development has been designed to ensure the residential accommodation is well-protected from existing and future noise and related disturbances. Balcony and balustrade designs have been integrated that will reduce impacts from noise. The access deck designs will also mitigate noise. Further mitigation methodologies include sound insulation for all elements of the building envelope, further insulation for walls and roofs/floors, high performance double glazing, management of hours for the maker spaces, and mechanical ventilation for the homes to provide clean air when windows are closed.
- 14.26 Some balconies have an unscreened line of sight to railway lines and as such would have noise levels that are generally in excess of recommended levels. Balconies have been designed to ensure that noise levels are minimised as far as possible, including additional screening where appropriate. Alternative amenity areas are provided for homes on Site A within the ground floor courtyards, which would be mostly screened from railway noise. Quieter open spaces are also available locally. The internal environments for dwellings has been carefully designed to experience minimal noise disturbance as a means of offsetting any noisier external balconies.
- 14.27 The Council's Environmental Health Officer has reviewed the application. The EHO states that appropriate noise guidelines have been followed in the building's design given its siting close to transport noise and with due regard

to the relevant British Standards and World Health Organisation guidelines. A detailed design of noise management shall be secured by condition.

- 14.28 The impact of vibration from the railway lines has been assessed and it is noted that this is expected to be negligible for buildings on Site A. To ensure impact is minimised further details of vibration mitigation will be secured by condition to ensure that suitable mitigation will be provided if necessary.
- 14.29 Noise emissions and vibration from mechanical plant and equipment associated with the development would be controlled by condition to be within acceptable limits.

***Agent of change***

- 14.30 London Plan Policy D13 places the places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development and there are sites safeguarded for transportation, distribution, processing and/or production of aggregates in the locale, namely the Heidelberg concrete facility which is located between the railway tracks to the south-east of Site A. This facility also manages movement of materials via the railway tracks to the east of Site A.
- 14.31 The noise environment has been robustly assessed as reported in Volume 2 Chapter 9 of the Environmental Statement and the associated Volume 4 Appendix E. The proposals have been designed to create an acceptable environment for residential (and commercial) occupiers through measures described in the noise and vibration section above which includes facade design measures such as access decks, high quality insulation to facades and mechanical ventilation supports good internal air quality when windows are closed.
- 14.32 Network Rail is the freeholder and DB Cargo the long lease holder and rail freight operator for a significant, and strategically important freight site, supporting rail served minerals operations and located immediately to the east of the two application sites. NR & DBC objected to this application on grounds of both proposed developments at Site A and Site B having the potential to introduce new sensitive uses which may not have been appropriately or robustly assessed in the context of noise and in turn triggering associated agent of change issues in relation to ongoing operation of the rail infrastructure and industrial facilities which immediately neighbour the development sites. This objection was primarily based on the perceived inadequacy of noise survey information provided with the application.
- 14.33 The applicant subsequently undertook additional noise survey information in December 2025 and submitted this to the Council in January 2026. This information has been assessed by the Council's Environmental Heath Officer and it was concluded that proposed noise management measures for the

new residential properties on Site A would be sufficient, subject to conditions, to ensure that DBC and NR's existing and ongoing operations and functions would be in relation to agent of change.

- 14.34 Therefore, conflicts are not anticipated with the existing industrial operations in the area, and the agent of change requirements are considered to have been met and will be controlled through condition and **s106 legal agreement**.

***Air quality***

- 14.35 Air quality at the sites and surrounding area is generally good and is likely to improve over time due to reductions in vehicle use and industrial activities in the area as the result of this development proposal, given it would be car free. The nearby cement batching plant would not create any negative impacts from dust as it is required to operate in accordance with an environmental permit specifying mitigation measures for any dust creation. It is relevant to note that there are already homes in the area, for example those on Maiden Lane Estate, that are closer to the concrete batching facilities than the proposed development on Site A and as such residential properties are already an established use in the local area. Further information on air quality is available below in the 'Air quality' section. Further comments on construction management are available in the 'Transport' section.

***Outlook and privacy***

- 14.36 Outlook from all of the proposed homes within the development proposal on Site A would be good. By virtue of the development's siting adjacent to a railway line, with a landscaped public realm to the north, south and west, and the siting of the homes above a ground floor podium all homes would have unobstructed views either onto the local public realm including Camley Street or across London. There is a minimum separation distance between existing and proposed buildings of 20 metres which ensures an excellent level of privacy and outlook.

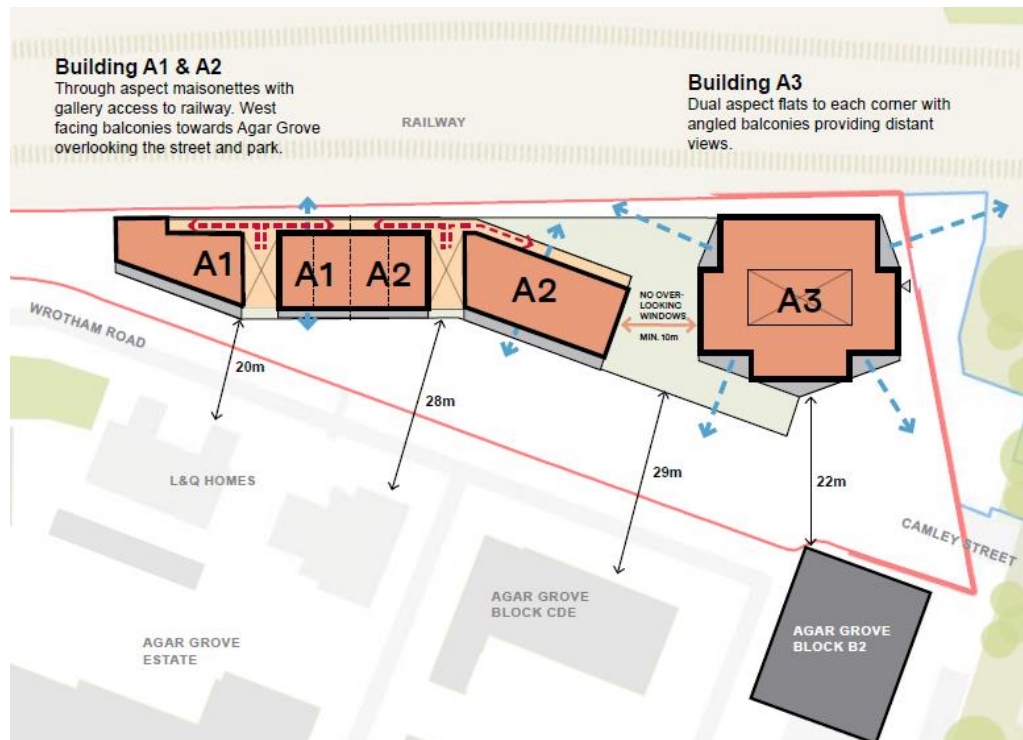


Figure 12 - Housing block layout and separation distances

### Accessible units

- 14.37 CLP policy H6 requires 90% of new-build homes to comply with M4(2) (accessible and adaptable dwellings) and a requirement for 10% of new build homes to comply with M4(3) (wheelchair units).
- 14.38 12 of the homes within the development on Site A would be M4(3) homes which is 10.1% of the total number of homes on site. These would be provided as M4(3)(2)(b) wheelchair accessible dwellings as is required for social-affordable housing by the Housing CPG. 10 would be provided as two-bedroom homes, with four provided in the larger two-bed four-person size (the other six would be two-bedroom three-person). Two three-bedroom five-person accessible units would be provided too.
- 14.39 All other homes would be provided to the M4(2) standard. Provision of accessible homes will be secured through shadow s106 legal agreement.
- 14.40 The buildings are designed as a single block with three cores which enables easy lift access to all accessible units. Cores will be open and spacious with access decks designed to be extra wide at points to allow wheelchairs and/or buggies to pass. Although there are changes in land levels on and around the site this would be managed through sloped landscaped routes to ensure all are able to navigate safety around the site.



Figure 13 - Location of wheelchair units for Block A1 (shaded)

### Conclusion

- 14.41 The proposed flats are considered acceptable in terms of layout, aspect, amenity space, light, noise and air quality, and for all other reasons, and are therefore considered to provide acceptable level of amenity generally. The development has been designed with mitigation measures towards local noise conditions integrated into the scheme and as such is in accordance with agent of change principles, with ongoing management of **agent of change matters secured by shadow s106 legal agreement**.
- 14.42 The development would provide accessible flats for all, including appropriate provision of wheelchair homes, allowing the buildings to house an inclusive community that can use them safely, easily and with dignity. The provision of wheelchair homes for those in affordable housing, where occupants are more likely to be disabled (a protected characteristic under the Equality Act), would benefit disabled residents and enable a more inclusive community.

## 15. HERITAGE

### Legislation and policy context

- 15.1 Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out that special regard must be given to the preservation of a listed building, its setting or its features of special architectural or historic interest. Section 72 of the same Act sets out that special regard must be given to preserving or enhancing the character and appearance of a conservation area.
- 15.2 Any harm arising should be mitigated as far as possible, for example, through the design and approach of the scheme. Considerable weight and importance must be given to any harm to designated heritage assets, and

any harm identified should be outweighed in the balance by considerable public benefits.

15.3 Paragraph 212 of the NPPF states:

*212. 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 (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.*

15.4 Paragraph 215 of the NPPF states:

*215. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.*

15.5 There are also non-designated heritage assets in the surrounding area and these most notably include locally listed buildings, as well as buildings that make a positive contribution to conservation areas.

15.6 Any harm to non-designated heritage asset is a matter of planning balance as set out in paragraph 216 of the NPPF:

*216. 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.*

15.7 The development plan and the policies of the NPPF make clear that conservation and heritage are important factors that should be given considerable weight in decision making. The design and heritage policies in CLP policy D2 and LP policy HC1 also note the importance of character and appearance, and so officers have given great weight to these considerations. The development plan focuses on the potential impact of new development on the built environment, but also the impact on archaeological remains which may often be unidentified but discovered in the future. Development should avoid harm or minimise harm to designated heritage assets. The policies and NPPF also provide protection to non-designated heritage assets. The ES considers impacts on heritage both in terms of the built environment and archaeology.

- 15.8 Core Objective 6 of the CSNP states that development shall preserve and enhance the area's existing positive features including designated and non-designated heritage assets. However, there are no heritage features nearby identified by CSNP, there are some on the canal.

***Assessment context***

- 15.9 The local planning authority is required to assess the application for Site A on its own merits. However, as mentioned above this application for proposed development on Site A (120-136 Camley Street) is being submitted at the same time as development on Site B (3-30 Cedar Way). The sites are being brought forward in parallel, and this enables us to undertake a comprehensive and joint assessment of the planning case across both sites. The cumulative impact of development particularly on townscape, views and heritage are frequently raised by consultees, the concern being whilst a scheme might be acceptable on its own, combined with others it is not. For this reason, this report considers the cumulative impact of the development of Site A and Site B, noting that if only one were to proceed then the overall impact would be less. This approach was agreed with the LPA and GLA as part of the pre-application process. As such, the assessment below considers the developments on Site A and Site B together, which represents the potential maximum impact scenario in terms of anticipated impact on the built environment and local heritage of both developments being built out.
- 15.10 The following table summarises the impact on heritage assets in the area:

Heritage asset	Designation	Impact on Significance
Camden Square Conservation Area	Designated – Conservation Area	Less than substantial harm – low level (from Site A and Site B developments)
Camden Broadway Conservation Area	Designated – Conservation Area	No harm
Regent's Canal Conservation Area	Designated – Conservation Area	Less than substantial harm – low level (from Site B development only)
King's Cross and St. Pancras Conservation Area	Designated – Conservation Area	No harm
Rochester Gardens Conservation Area	Designated – Conservation Area	Less than substantial harm – very low level (from Site B development only)
Jeffrey's Street Conservation Area	Designated – Conservation Area	No harm
Camden Town Conservation Area	Designated – Conservation Area	No harm
Barnsbury Conservation Area	Designated – Conservation Area	No harm

Regent's Park Conservation Area (LB Camden)	Designated – Conservation Area	No harm
Regent's Park Conservation Area (LB Westminster)	Designated – Conservation Area	No harm
All Saints Greek Orthodox Church (including boundary railings and gates)	Designated – GI Listed	Less than substantial harm – medium level (from Site B development only)
1 –59 Cumberland Terrace	Designated – GI Listed	No harm
1-42 Chester Terrace	Designated – GI Listed	No harm
1-4 Cumberland Place	Designated – GI Listed	No harm
2-11 Gloucester Gate	Designated – GI Listed	No harm
K2 telephone kiosk at junction with Agar Grove	Designated – GII Listed	No harm
1 and 1a Cobham Mews studios	Designated – GII Listed	No harm
St Katharine Danish Church	Designated – GII* Listed	No harm
111-121 St Pancras Way	Designated – GII Listed	No harm
1-6 Greenwood Almshouses	Designated – GII Listed	No harm
157 & 159 Royal College Street	Designated – GII Listed	No harm
1-10 Lyme Street	Designated – GII Listed	No harm
16-31, 24-29, 31-37, 32-53 & 82-90 Pratt Street	Designated – GII Listed	Less than substantial harm – low level (to 82-90 Pratt Street only, from Site B development only)
King's Cross gasholders nos. 8, 10, 11 & 12	Designated – GII Listed	No harm
Steam locomotive water point	Designated – GII Listed	No harm
Lock Keeper's Cottage, Grand Union Canal	Designated – GII Listed	No harm
Eastern Coal Drops, King's Cross	Designated – GII Listed	No harm

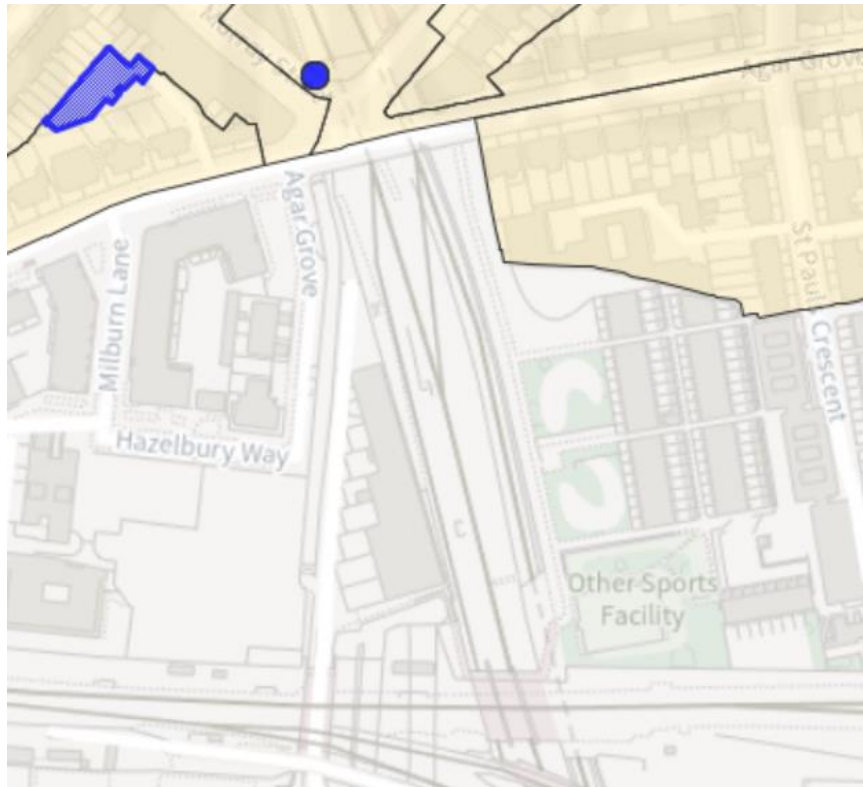


Regent's Park	Designated – Registered Park and Garden Grade I	Less than substantial harm – low level (from Site B development only)
St Pancras Gardens	Designated – Registered Park and Garden Grade II	No harm
Golden Lion Public House	Non-designated – locally listed building	No harm
101-135 Royal College Street	Non-designated – locally listed building	No harm
57, 64, 92-106 Pratt Street	Non-designated – locally listed building	No harm
85-93, 92 Camden Street	Non-designated – locally listed building	No harm
St Martin's Gardens	Non-designated– locally listed garden	Less than substantial harm – low level (from Site B development only)

*Table 7 - Summary of impact on heritage assets*

***Conservation areas and listed buildings (designated heritage assets)***

- 15.11 The site is not in a conservation area, and there are no listed buildings or any non-designated heritage assets within the boundaries of the two sites. There are designated heritage assets in the surrounding area consisting of conservation areas and listed buildings.



*Figure 14 - Map of Conservation Areas and Listed Buildings near Site A (Grade II Listed features in blue, conservation areas in yellow)*

15.12 The map above shows the key conservation area north of Site A, along with two listed structures closest to the site. These designated assets are:

1. Camden Square Conservation Area
2. Cobham Mews studios (Grade II Listed)
3. K2 telephone kiosk at junction with Agar Grove (Grade II Listed)

There are other designated and non-designated heritage assets which were considered in terms of impacts, but they are a greater distance from the site so not shown on the map. As the table above notes there is no harm to them from the proposed development of Site A.

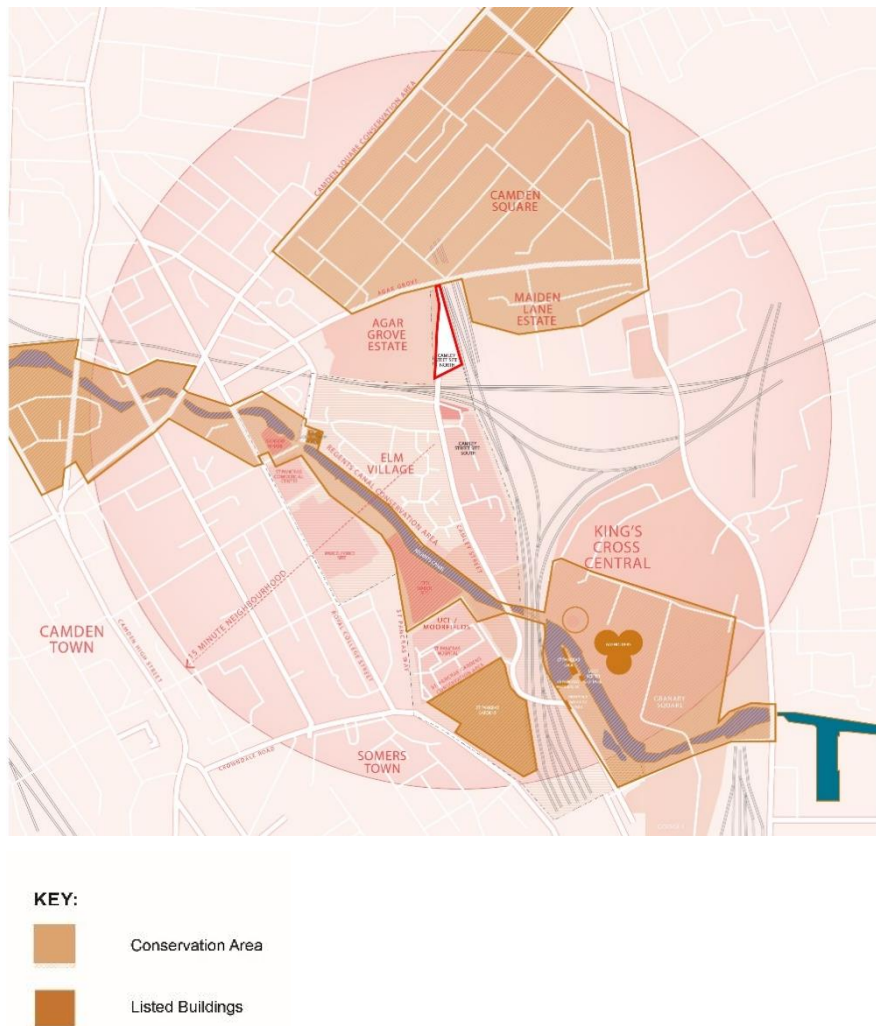


Figure 15 - Map of Conservation Areas and Listed Buildings near Site B

15.13 The potential impacts of the proposed developments on these heritage assets will be on their setting, largely impacting on views from within the conservation areas and adjacent to the listed buildings in a way which alters their relationship to the surrounding context. Their settings however do not always contribute to their significance.

15.14 Volume 3 of the submitted Environmental Statement (ES) includes a Built Heritage, Townscape and Visual Impact Assessment (BHTVIA) which contains an assessment of heritage impacts within both a 500m radius and a 2km radius from both sites, which scoped-in heritage assets informed by a Zone of Theoretical Visibility assessment. Key heritage assets are set out in the table above.

#### Cobham Mews (Grade II)

15.15 The effect of the proposed development on the setting of the asset has been assessed under the development of Site A, and the cumulative impact (development of Sites A and B).

- Site A: Preserves the setting of heritage assets
- Cumulative: Preserves the setting of heritage assets

15.16 Cobham Mews Studios was listed in August 2025 at Grade II. It is a pair of late 1980s Studio Offices by David Chipperfield. The buildings are located deep within Cobham Mews and the facade is visible when facing away from Site B (and Site A, which is further away from the listed buildings). Therefore in all views looking towards the listed building Site A and Site B would not be visible. There may be some visibility of Site B when exiting the Mews, i.e. when facing away from the listed building. However, the chief significance of the listed building in terms of its setting is its location within a mews and the development of Sites A and B is not considered to have any effect on the significance of the setting of the listed buildings, i.e. the setting would be preserved.

#### K2 Telephone Box (Grade II)

15.17 The effect of the proposed development on the setting of the asset has been assessed under the development of Site A, and the cumulative impact (development of Sites A and B).

- Site A: Preserves the setting of heritage assets
- Cumulative: Preserves the setting of heritage assets

15.18 .It was designed to be located in any useful location throughout the UK and its significance lies in its design as part of a national network rather than being designed for a specific location or setting. Therefore the development of Sites A and B is not considered to have any effect on the significance of the setting of the listed building, i.e. the setting would be preserved.

#### All Saints Greek Orthodox Church (Grade I)

15.19 The effect of the proposed development on the setting of the asset has been assessed under the development of Site A, and the cumulative impact (development of Sites A and B).

- Site A: Preserves the setting of heritage assets
- Cumulative: less than substantial harm (medium)

15.20 The effect of the proposed development on the setting of the asset has been assessed under the development of Site A, the development of Site B and the cumulative impact (development of Sites A and B). No harm has been found to arise from the development of Site A and therefore the harm which arises is due to the development of Site B in both isolation and as a cumulative development with Site A (but not causing cumulative harm, i.e. the harm under the development of Sites A and B still arises only from Site B).

- 15.21 The proposed development would introduce tall and modern residential buildings approximately 460m east of All Saints Greek Orthodox Church. The potential setting impact is derived from the visibility of the proposed development together with the church in views looking east from St Martin's Close and Camden Street/Pratt Street. The church's intrinsic interests and setting would be otherwise unaffected by the proposed development, including those parts of its setting which make a positive contribution to the heritage value of the church: the late Georgian and Victorian terraces and the views of the church looking north-south along Camden Street.
- 15.22 The existing buildings on the sites have no historic or architectural associations with All Saints Greek Orthodox Church and therefore the potential impact of the proposed development is limited to intervisibility from St Martin's Close and Camden Street/Pratt Street. There would also be visibility of the proposed development from St Martin's Gardens, which does not have a direct functional relationship with the church, but does form a pleasant open space to enjoy views of the listed building.
- 15.23 Three verified views (nos. 6, 7 and 8) have been prepared to demonstrate the visibility from these locations. View 6 is located at the west end of St Martin's Gardens, affording long views east across the open space. The proposed development would be visible in filtered views through the canopy during winter months when deciduous trees are without leaf. the proposed development would sit subservient to the tree canopy and would be entirely occluded during summer months. Where glimpsed through the canopy the tallest building on Site B would be located at a considerable distance from the stone tower of the church and, mindful of the significant separating distance, would not detract from its landmark prominence.





*Figure 16 – View 6 from St Martin's Gardens showing both development proposals*



*Figure 17 – View 7 from St Martin's Close showing both development proposals*





*Figure 18 - View 8 from Pratt Street (showing both development proposals in wireline form)*

- 15.24 View 7 is located at the west end of St Martin's Close. The proposed tallest building on Site B would be visible in axial views along the street in conjunction with and partially backdropping the stone tower of the church. the proposed development would remain visually subservient to the church tower, with its prominence diminishing as the observer moves east along St Martin's Close, where it falls below the church's ridgeline. Nevertheless, from this vantage point, the development of Site B would still momentarily draw the eye, subtly detracting from the setting and heritage value of the listed building.
- 15.25 View 8 is located on Pratt Street, located opposite the church. The proposed tallest building on Site B would be visible in the axial views along the street. It would be visible as part of a layered view, beyond the immediate buildings in the foreground and markedly subservient to the church and its tower in the foreground. It would form a peripheral and incidental part of the view, which would not detract from the primary importance of the western elevation of the church in the foreground.
- 15.26 Taken as a whole (i.e. with consideration of the proposals for Sites A and B), the proposed development would have a very low magnitude of impact on the value of the receptor, arising from the intervisibility in views along St Martin's Close. All other aspects contributing towards the heritage value of the church would be preserved.

- 15.27 It is considered that the setting of the Grade I listed All Saints Greek Orthodox Church would be harmfully affected by the proposed development because the tallest elements of the development (on Site B) will be visible behind the tower and cupola of the church in a space that is currently open sky. The church was originally constructed in what was then (early C19th) an outer suburb of London, and the view of sky behind the tower and cupola is part of its historic townscape setting and evidential value.
- 15.28 The west elevation of the church is visible from St Martin's Close – a street contemporary with the church and part of its contextual setting. The proposed tallest building on Site B would be visible in axial views along the street in conjunction with and partially backdropping the stone tower of the church. This effect is limited to scenarios where developments on Site B and both Site A and B are completed, with no effect identified in the case of development on Site A only.
- 15.29 Given the scale of the development in relation to the scale of the church, the distance between the sites and the setting of the church as a whole, it is concluded that the harm to the setting of the church will be less than substantial at a medium level on this scale (under scenarios when Site B is built out only). The setting of the church would not be entirely lost due to the development on Site B, but because the west front of the church (which is the main public frontage of the listed building and includes the most formal view of its tower and cupola) would be affected by the tallest building of the development the most significant view of the church would be harmed.
- 15.30 Therefore, the level of harm caused to the setting of the GI listed building is less than substantial harm in all scenarios where the proposal on Site B is built out. The harm would fall at the medium end of that scale because not every view of the church against the skyline would be compromised, but an important "front-on" view of the intended historic setting of the principal façade of the building would be compromised.
- 15.31 If the proposal on Site B is not built out, and only Site A is developed in accordance with this planning application, there would be no harm caused to this heritage asset.

#### 82-90 Pratt Street (Grade II)

- 15.32 The effect of the proposed development on the setting of the asset has been assessed under the development of Site A, and the cumulative impact (development of Sites A and B).
- Site A: Preserves the setting of heritage assets
  - Cumulative: less than substantial harm (very low) to setting of heritage assets



- 15.33 No harm has been found to arise from the development of Site A and therefore the harm which arises is due to the development of Site B in both isolation and as a cumulative development with Site A (but not causing cumulative harm, i.e. the harm under the development of Sites A and B still arises only from Site B).
- 15.34 82-90 Pratt Street is located approximately 395m west of the sites. The proposed development would not affect the intrinsic interests or local setting of the receptor. The potential impact is derived from views of the proposed development including the Almshouses on Pratt Street. Pratt Street is a varied streetscape where modern and historic development are interspersed. The wider setting of the listed buildings comprises development of different style and scales.
- 15.35 The proposed developments would introduce a new building (Building B1 on Site B) of up to 31 storeys to the east of the listed buildings that would appear in the views looking east on Pratt Street. Site A would be occluded by interposing development between Pratt Street and the Site. Looking east on Pratt Street or from Camden Street, the west elevation of Building B1 would be seen above the roofline of the receptor and the neighbouring terraces. View 8 demonstrates the maximum extent of intervisibility between the Proposed Development and the listed buildings.
- 15.36 The proposed development would result in a change to the setting; however, this would not affect one's ability to appreciate the special interest of the terrace. The strong parapet line of the buildings, a characteristic element of 19th century residential development, would remain distinct against Building B1 (on Site B). As one approaches the principal façade of the terrace, the proposed development would recede from view, becoming a peripheral element in the wider urban environment. It is here that the architectural quality of the principal façade, which presents the special interest of the receptor, can be best appreciated.
- 15.37 The setting of the listed buildings comprises development of many styles and building ages, including modern mid-rise buildings. The proposed development would be understood as being distinct from the receptor and the finer urban grain of Pratt Street. The setting relationship between the receptor and other 19th century development, notably the Grade I Greek Orthodox Church and locally listed terraces to the east, would remain intact.
- 15.38 The GII listed terrace at 82-90 Pratt Street would see less than substantial harm caused to setting by the tallest buildings proposed (on Site B). This currently reads as a C19th terrace with sky above. The view of the sky above this terrace looking towards the application site would be infilled by the tallest phase of development which represents a loss of its historic townscape context. However, the harm caused would be less than substantial at a lower level on that scale, and other views towards the listed terrace, such as from

the east and north, would not be affected by the proposed development. The proposal on Site A would not cause any heritage harm.

#### Camden Square Conservation Area

- 15.39 The effect of the proposed development on the setting of the asset has been assessed under the development of Site A, and the cumulative impact (development of Sites A and B).
- Site A: Less than substantial harm (low)
  - Cumulative: Less than substantial harm (low)
- 15.40 The effect of the proposed development on the setting of the asset has been assessed under the development of Site A, the development of Site B and the cumulative impact (development of Sites A and B). No harm has been found to arise from the development of Site A and therefore the harm which arises is due to the development of Site B in both isolation and as a cumulative development with Site A (but not causing cumulative harm, i.e. the harm under the development of Sites A and B still arises only from Site B).
- 15.41 Camden Square CA comprises a cohesive Victorian residential development, set on a grid pattern focussed around a central public green space and planted with large mature trees. To the north there are contemporary residential properties located in the Bartholomew Estate CA and Rochester Gardens CA. To the south, the CA is bound by railway infrastructure and 20th century housing estates. The CA is experienced as part of a varied urban environment, with an established context of modern development located to the south.
- 15.42 It is considered that a less than substantial degree of harm at the low level of the scale would occur to the setting of the conservation area due to the proposed development encroaching on the historic skyline above a terrace of C19th houses when viewed from North Villa/Camden Terrace. This can be seen in view 10 below.



*Figure 19 - View 10 from North Villas/Camden Terrace (showing both development proposals in wireline form behind the trees)*

- 15.43 There would also be less than substantial harm at low level of the scale to the setting of the CA due to the proposed development encroaching on the historic skyline above a C19th street from St Paul's Crescent. See view 27 below.



*Figure 20 - View 27 from St Paul's Crescent (showing both development proposals in wireline form)*

- 15.44 View 26 (below) is taken from outside of the Camden Square Conservation Area. The proposed development of Site B (singly or cumulatively) would cause a less than substantial degree of harm at a very low level of the scale to the setting of the conservation area due to the proposed development encroaching on the historic skyline above C19th terraces forming part of the conservation area in wider townscape views).





*Figure 21 - View 26 from Cantelowes Gardens, outside of the CA (showing both development proposals in wireline form)*

15.45 Regent's Canal Conservation Area

15.46 The effect of the proposed development on the setting of the asset has been assessed under the development of Site A, and the cumulative impact (development of Sites A and B).

- Site A: Preserves the setting of heritage assets
- Cumulative: Less than substantial harm (low)

15.47 Regent's Canal CA is located approximately 135m south-west of the Site at the nearest point. The separating distance and interposing development mean that the Proposed Development would not affect the intrinsic interest of the receptor, and the potential impact is derived from the visibility of the Proposed Development in views looking out of the CA.

15.48 Due to the low level of the canal and towpath, which sit below the surrounding built environment, there would be very limited intervisibility between the receptor and the Proposed Development. Both Site A and Site B would be largely occluded throughout the CA, except in elevated positions or from private land adjacent to the canal.

15.49 It is considered that a less than substantial degree of harm at the low level of the scale to the setting of the conservation area would occur due to the proposed development encroaching on the historic skyline adjacent to views

south towards the C19th Constitution Public House on Georgiana Street - see view 14 below.



*Figure 22 - View 14 from Georgiana Street (showing both development proposals)*

#### Rochester Conservation Area

- 15.50 The effect of the proposed development on the setting of the asset has been assessed under the development of Site A, and the cumulative impact (development of Sites A and B).
- Site A: Preserves the setting of heritage assets
  - Cumulative: Less than substantial harm (very low)
- 15.51 Rochester CA is located approximately 415m north-west of the Site at the nearest point. The separating distance and interposing development mean that the Proposed Development would not affect the intrinsic interest of the receptor, and the potential impact is derived from the visibility of the Proposed Development in views looking out of the CA.





*Figure 23 - View 24: Rochester Terrace Gardens (cumulative)*

- 15.52 A less than substantial degree of harm would occur at a very low level of the scale to the setting of the conservation area due to the proposed development encroaching on the historic skyline in an area generally characterised by a more open suburban skyline. This impact would occur in the event of Site B being developed in accordance with the submitted proposals – see view 24 above.

Regent's Park Conservation Area – less than substantial harm (low)

- 15.53 The effect of the proposed development on the setting of the asset has been assessed under the development of Site A, and the cumulative impact (development of Sites A and B).
- Site A: Preserves the setting of heritage assets
  - Cumulative: Less than substantial harm (low)
- 15.54 There is a considerable separating distance to the sites (1.2km) and a large and varied skyline seen in existing views from Regent's Park, which is a Registered Park and Garden designated at Grade I.
- 15.55 The very top of the tallest element on Site B would be seen from within the park in View 33. Therefore, in most instances the proposed developments will not be visible from within the Regent's Park and cannot be seen in the setting of the listed buildings around the Park, but in the case of View 33 there will be some visibility within the landscape in winter. This occurs in an instance where there are no other buildings visible above the winter treeline and therefore some harm is caused to the setting of the Grade I Registered Landscape in this view.

- 15.56 The harm caused to the qualities of the Regent's Park as a whole is limited to this view, and there are other views from within the park where tall buildings are visible over the treeline in winter. However, the view affected by the proposed development is a wide and comprehensive vista currently devoid of visible tall buildings. The level of harm caused is considered to be less than substantial at the low end of that scale.



*Figure 24 - View 33 from Regent's Park (showing both development proposals in wireline, behind the trees summer and winter*

***Locally listed buildings (non-designated heritage assets)***

- 15.57 There are few locally listed buildings around the site. The closest are shown on the map below, both on the left of the image. These are a granite settled carriageway at Agar Place (top left of image below) and 2 Barker Drive (bottom left). Any impact on them is a matter of balanced judgement. Both structures have been scoped out of the heritage assessment.



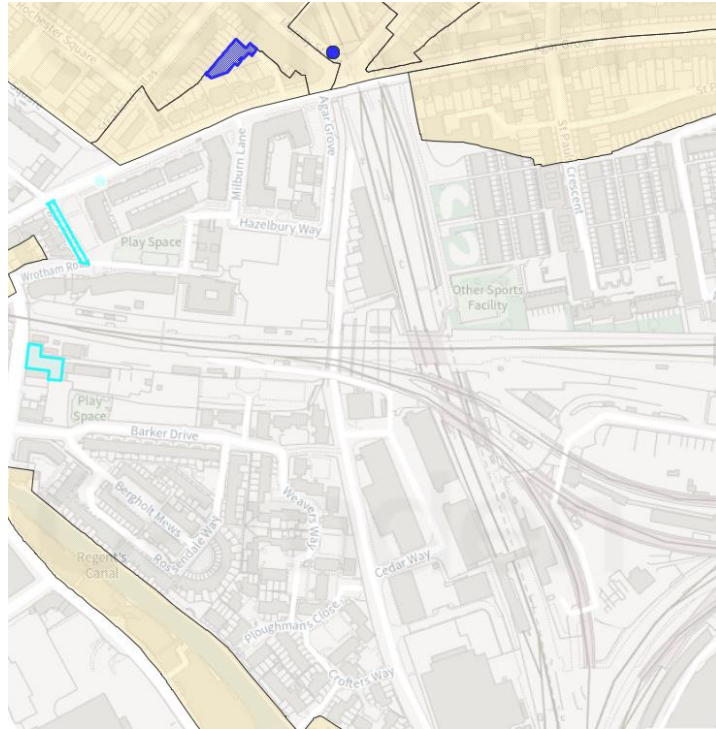


Figure 25 - Map of Locally Listed Buildings near the sites

#### St Martin's Gardens (Locally Listed)

15.58 The effect of the proposed development on the setting of the asset has been assessed under the development of Site A, and the cumulative impact (development of Sites A and B).

- Site A: Low level of harm to the Locally Listed Garden (NDHA)
- Cumulative: : Low level of harm to the Locally Listed Garden (NDHA)



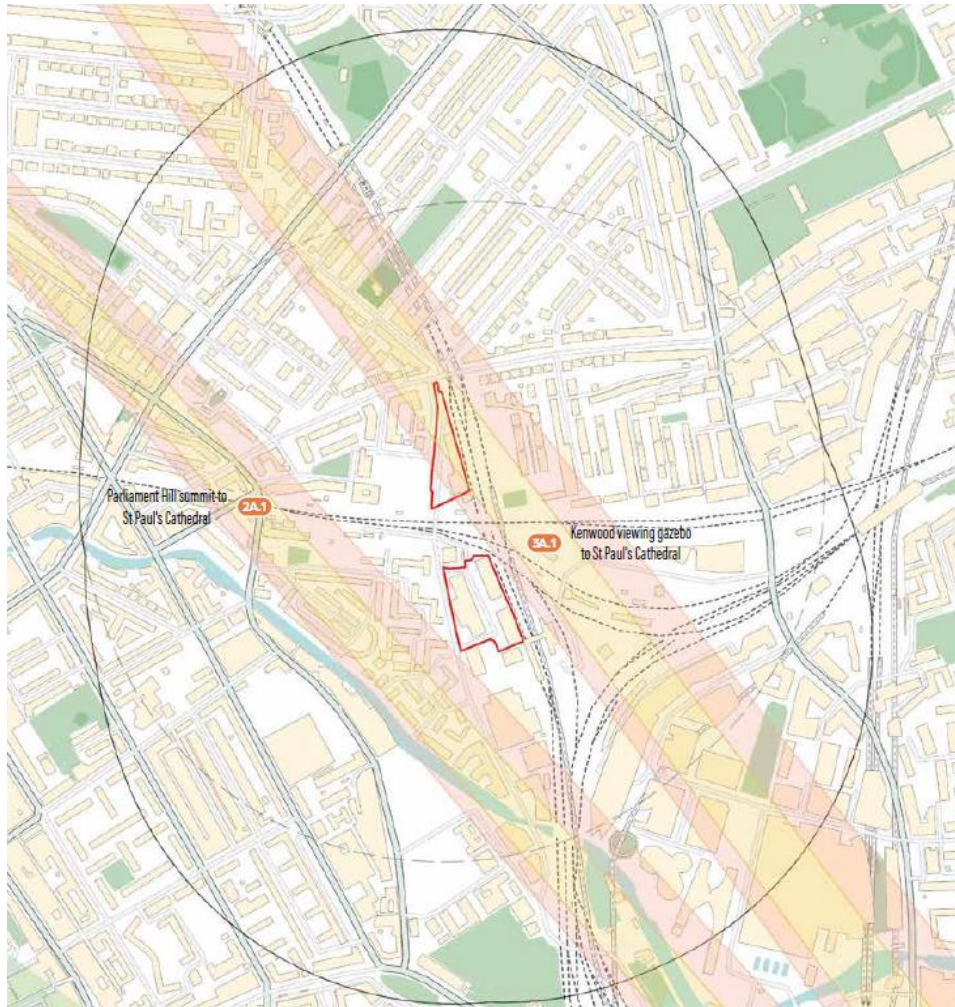
*Figure 26 – View 6 from St Martin's Gardens showing both development proposals*

- 15.59 View 6 (see above) is located at the west end of St Martin's Gardens, affording long views east across the open space. There would be visibility of the proposed development from St Martin's Gardens, which is close to the All Saints Greek Orthodox Church. It does not have a direct functional relationship with the church but does form a pleasant open space to enjoy views of the listed building.
- 15.60 There would be harm at a low level of the scale to the setting of this non-designated heritage asset due to the taller structures on the site being visible in the skyline of an area historically surrounded by less dense development and appreciated for its qualities as an open space.

#### ***London View Management Framework (LVMF)***

- 15.61 There are some important views across London, from parks and other public spaces that take in important buildings, to urban landscapes that help define London. The London Plan protects these and provides the basis for more detailed guidance on each view. This is called the London View Management Framework (LVMF) and is an adopted SPG. LP policies HC3 and HC4 refer to the importance of views and state that development should preserve and, where possible, enhance a viewer's ability to recognise and appreciate Strategically Important Landmarks in these views.





*Figure 27 - LVMF views across the sites and local area*

- 15.62 LVMF 2A.1 is located at the summit of Parliament Hill. The LVMF identifies a Protected Vista looking south towards St Paul's Cathedral. The management guidance for the foreground and middle ground of view 2A.1 states: 'The panorama is sensitive to large-scale development in the foreground and middle ground'.



*Figure 28 - LVMF view 2A.1 from Parliament Hill to St Paul's Cathedral (with development proposals on Site A and Site B plus cumulative schemes)*

- 15.63 LVMF 3A.1 is located at the viewing gazebo within the parkland adjacent to Kenwood House. The management guidance states: 'The view is particularly sensitive to development breaching the tree line in the middle ground, as it would inhibit views of the panorama'.



*Figure 29 - LVMF view 3A.1 from Kenwood House to St Paul's Cathedral (with development proposals on Site A and Site B plus cumulative schemes)*

- 15.64 Site A is within the Protected Vista and Wider Setting Consultation Area for LVMF 3A.1 Kenwood viewing gazebo to St Paul's Cathedral. Site B is located between the Wider Setting Consultation Areas for LVMF 3A.1 and LVMF 2A.1 Parliament Hill summit to St Paul's Cathedral.
- 15.65 The height of Buildings A1-A3 on Site A has been designed to sit beneath the viewing corridor of the Protected Vista in LVMF 3A.1 and as such there would be no change to the view of St Paul's Cathedral or the composition and characteristics of the strategic view.
- 15.66 The proposals for Site A would sit in the foreground of the City of London's tall building cluster but would not obstruct views of the cluster. On Site B, Block B3 would appear subordinate to the ridge line in the background. Block B1 would rise above the ridge line. Positioned in the middle ground, its scale would step down from the taller buildings of the City cluster and The Shard.
- 15.67 The proposed development of the sites in all scenarios would result in a change to the periphery of the LVMF views relevant to the applications and the effect would be acceptable under the LVMF guidance. The GLA have not raised any concerns regarding the impact on LVMF views.

### ***Archaeology***

- 15.68 The sites are not located in an Archaeological Priority Area, and the Greater London Archaeology Advisory Service (GLAAS) raised no objection to the current application and information submitted in support. The applicant carried out a desk-based assessment of archaeological impact and identified archaeological risks associated with the proposal, primarily from the remains of a C19th goods shed and potential prehistoric materials associated with the River Fleet.
- 15.69 GLAAS therefore have recommended that a two-stage archaeological condition is added to any grant of planning permission that secures further investigation and analysis of site archaeology and provides a programme of public benefits if this is necessary, and that this would provide an acceptable safeguard to ensure adequate protection of archaeological materials.

### ***Conclusion***

- 15.70 The sites are not located within conservation areas and there are no heritage assets on site. There are conservation areas near to the sites, as well as listed buildings. In accordance with Section 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, and relevant case law, great weight has been given to this harm in the planning balance. The NPPF and local policies (CLP D1, D2; LP HC1, HC2, HC3, HC4) require that any harm to designated heritage assets must be clearly and convincingly justified and outweighed by public benefits.

### **Site A: Impact**

- 15.71 In terms of impact from the proposed development at Site A it will result in a low level of less than substantial harm to the Camden Square Conservation Area. As outlined above, all other heritage assets are preserved by the proposals at Site A included within this application.

### **Cumulative (Site and Site B): Impact**

- 15.72 The proposed development on Site A (120-136 Camley Street) is being submitted at the same time as development on Site B (3-30 Cedar Way and the sites are being bought forward in parallel it is important to consider the cumulative impact of these two schemes on townscape, views and heritage as these have frequently been raised by consultees.
- 15.73 When considered cumulatively, other heritage assets further from the sites will be affected. This is mainly due to the height of the tallest building proposed on Site B. This, and the proposed introduction of a more urban character to the area resulting in a higher density and scale of buildings, would result impact the setting of some heritage assets.
- 15.74 Harm has been identified to the setting of the GI listed Greek Orthodox church under the development proposals for Site B only, and for Sites A and



B together (but due only to Site B being included in the cumulative development). The level of harm caused to the setting of the GI listed building is less than substantial harm. The harm would fall at the medium end of that scale.

15.75 The GII listed terrace at 82-90 Pratt Street would also see less than substantial harm caused to setting by the tallest buildings proposed (on Site B). The harm caused would be less than substantial at a very low level on that scale, and other views towards the listed terrace, such as from the east and north, would not be affected by the proposed development.

15.76 A low (and very low) level of harm has also been identified to the setting of other surrounding designated and non-designated heritage assets as explained in the sections above. These are: Camden Square Conservation Area, Regent's Canal Conservation Area, Rochester Gardens Conservation Area, The Regent's Park Registered Park and Garden. Area only. All other harm to heritage assets would be associated with the proposed development on Site B.

#### Overall Conclusion: Heritage

15.77 All other designated and non-designated heritage assets identified within a 2km radius of the proposed developments would have their significance preserved by both proposals.

15.78 In accordance with Section 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, and relevant case law, great weight has been given to this harm in the planning balance. The NPPF and local policies (CLP D1, D2; LP HC1, HC2, HC3, HC4) require that any harm to designated heritage assets must be clearly and convincingly justified and outweighed by public benefits.

15.79 The development would appropriately protect key views identified in the London View Management Framework, including those of St Paul's Cathedral, and would not result in any detrimental impact in terms of archaeology subject to conditions.

15.80 A low level of less than substantial harm has been identified to the Camden Square Conservation Area as a result of Site A. In weighing up this harm against the public benefits of the proposals it is considered that the significance and convincing public benefits of the proposal – particularly the affordable housing and affordable workspace represents a significant public benefit that outweighs this low level of harm.

15.81 When considering the cumulative impact of the proposals (site A and Site B) a greater level of less than substantial harm has been identified. In weighing the less than substantial harm identified (at the medium to very low scale for various designated and non-designated heritage assets) against the public

benefits of the proposal, it is considered that the significant and convincing public benefits associated with the scheme — particularly in the context of a high number of new homes, a policy-compliant provision of affordable housing on public sector land, redevelopment of an underutilised brownfield site, provision affordable workspace and creation of jobs and economic investment — are sufficient to outweigh the identified harm. These public benefits are discussed elsewhere in the report and summarised in the ‘Conclusion’ section below.

- 15.82 Details of material finishes to buildings shall be secured by condition to ensure impact on local heritage is minimised and the high-quality detailing of the development proposals shall be secured through the retention of the project architects, secured through shadow s106 legal agreement (for Site A).
- 15.83 Given the above, the proposal complies with the development plan in respect of heritage impact, most notably CLP policies D1 and D2, and LP policies HC1, HC2, HC3 and HC4. The statutory duty and policy requirement to give considerable weight to the conservation of heritage assets has been fully applied in this assessment.

## **16. DESIGN**

- 16.1 This section considers the scale of development, proposed massing arrangement and masterplan layouts, architectural approach, public realm and relationship with the parallel proposals for Site B Cedar Way.
- 16.2 CLP policies D1, D2 and CPG (Design) are relevant to the consideration of design when assessing planning applications. LP Policies D3, D4, D5, D8, and D9 are also relevant.
- 16.3 The Camley Street Neighbourhood Plan recognises the role that tall buildings play in assisting with accommodating density and growth, adding interest to the skyline and variety to the street scene. Policy DQ3 states that outstanding architecture is expected, incorporating high quality materials, finishes and details. The Neighbourhood Plan sets out three key policies on design quality and includes detailed analysis of the area, setting out opportunities and constraints and recognising the potential for the transformation of the existing industrial areas into a successful new mixed-use neighbourhood.
- 16.4 Under draft local plan policy D2, tall buildings are defined as over 30m in height outside of the CAZ (40m within). The draft policy identifies locations where tall buildings may be appropriate; the subject sites are specifically identified.



- 16.5 Site Allocation S5 of the emerging draft Local Plan identifies the 0.5ha site for a high-density, mixed-use redevelopment aimed at transforming its current state, characterised by 9 industrial workshop units and vehicle repair garages, into a prominent northern gateway. The policy stipulates delivery of approximately 110 additional self-contained homes alongside an intensification of employment floorspace (including light industrial, maker spaces, and offices) with a requirement for no net loss of existing industrial capacity.
- 16.6 To optimise the land, housing must comprise at least 50% of the additional Gross Internal Area, potentially coordinated with neighbouring allocations S6 (Cedar Way industrial estate) and 104-114 Camley Street to ensure a comprehensive urban design. Architecturally, the site is identified as suitable for tall buildings ranging from 12m to 42m, provided they respect the Mayor's London View Management Framework corridors and adhere to the Agent of Change principle to mitigate noise and air pollution from surrounding rail and industrial activities. Infrastructure requirements are extensive, focusing on connectivity and public realm; developers must provide new green public spaces, improve the entrance from Agar Grove, enhance pedestrian and cycle links to the Maiden Lane Estate, and contribute to the remediation of the North Camley Street bridge underpass. Furthermore, the allocation requires the safeguarding of a future access point for the Camden Highline, , and technical compliance regarding flood risk assessments and potential water supply upgrades as identified by Thames Water.
- 16.7 The Camden Building Heights Study (CBHS) 2024, prepared as part of the evidence base for the draft local plan, identified this site as a location where tall buildings may be an appropriate form of development, with 12m - 42m considered the potentially appropriate height range. Additional height, above the potentially appropriate height range, may be possible in some locations on this site, subject to testing of impacts on strategic views in the London View Management Framework and relevant local views.
- 16.8 Specific design criteria within the CBHS notes that:
- Any enclosure to Wrotham Road should be mitigated by greater height away from the street frontage.
  - Tall buildings should be located to avoid creating a canyon effect within the streets.
  - Tall buildings should be located towards the railway.
  - Tall buildings should complement Agar Grove towers and to mediate their height with the lower rise context.
- 16.9 The site is situated within the London View Management Framework (LVMF) Protected Vista and the Wider Setting Consultation Area for LVMF View 3.A.1, which intersects the site (covered within section 16).

- 16.10 In the Canalside to Camley Street Supplementary Planning Document the site is designated as a major opportunity for high-density, mixed-use redevelopment under Camden's Community Investment Programme (CIP). Key site-specific priorities include merging the Agar Grove estate access road with Camley Street to create a new two-sided street, which will feature an improved cycle link and a new public realm space to serve as a high-quality gateway arrival point. The guidance also requires the facilitation of access to the potential Camden Highline from both Agar Grove and Camley Street, alongside improvements to the North Camley Street bridge underpass, such as enhanced lighting, footways, and parking enforcement. Furthermore, development must explore the provision of a new or improved footbridge or deck to Maiden Lane to enhance north-south and east-west permeability. On a broader scale, any proposal for 120-136 Camley Street must align with the area-wide vision of Realising the Potential, which prioritises the delivery of significant self-contained and affordable housing alongside an enhanced stock of employment premises suitable for the Knowledge Quarter and creative sectors. Design principles for the site emphasise the need for a finer grain of blocks to replace large, impermeable single use sites and the requirement that building heights respect the London View Management Framework strategic corridors toward St. Paul's Cathedral. Ultimately, the policy seeks to integrate this site with the later phases of the Agar Grove Estate renewal to ensure that the previously isolated employment land becomes a sustainable and distinctive urban neighbourhood.

***Site location and context***

- 16.11 Site A occupies a strategic northern terminus at the top of Camley Street, serving as a gateway between the emerging Agar Grove Estate regeneration and the established residential neighbourhood of Elm Village. The triangular plot meets Agar Grove Road at its northern tip and is bounded by railway arches to the south. Currently occupied by underutilised 1970s industrial units, the site is used by a range of car repair businesses housed within single-storey metal sheds and with associated hardstanding these contribute to a fragmented urban grain, with yard spaces and footways frequently used for informal vehicle parking.
- 16.12 The site is bound by active Network Rail corridors to the north and east which provide a clear edge but contribute to a sense of enclosure and set acoustic challenges. While the site is physically and visually buffered from the Camden Square and Regent's Canal Conservation Areas by railway infrastructure and level changes, the site remains a key part of the Camley Street Spine.

### ***Surrounding townscape***

- 16.13 The site is in immediate proximity to three distinct residential communities: Agar Grove Estate, portions of Elm Village (both owned by the London Borough of Camden), and the recently regenerated Maiden Lane Estate. The wider context is rich and varied; within a 15-minute walk, the site connects to the major King's Cross redevelopment to the south and the vibrant district of Camden Town to the west. Access is currently provided via the Camley Street underpass, where the road travels beneath a Network Rail bridge.
- 16.14 Site A is predominantly level along its length, following the contour of the adjacent railway. However, the site's edges are defined by complex level changes where the site boundary has a significant change in level relative to Wrotham Road.

### ***Site appraisal and opportunity***

- 16.15 The current condition of Site A is defined by its industrial isolation and significant topographical challenges. The site lacks visual permeability and fails to contribute positively to the surrounding residential grain. A primary constraint is the 5-metre level change between the site and Wrotham Road to the west, currently managed by a series of retaining walls and a narrow cycle path that creates a sense of severance. Furthermore, the site's proximity to active rail corridors imposes complex environmental constraints, including 24-hour noise, and vibration.
- 16.16 Development is also constrained by the Kenwood Park LVMF (London View Management Framework) View 3.A.1, which intersects the site. While the 18-storey Agar Grove Block B will introduce some overshadowing from the mid-late afternoon, the site generally receives high levels of sunlight and daylight due to the medium scale nature of the existing surrounding context.
- 16.17 The redevelopment of 120-136 Camley Street offers an opportunity to, transition from a dead-end industrial yard to a permeable, mixed-use gateway.

### ***Overall design concept and typology***

- 16.18 The proposed design concept for Site A is defined by its role as the northern anchor of the Camley Street Spine, serving as a critical gateway that terminates the vista and facilitates a new urban connection to the Agar Grove Estate. To address the site's significant level changes and its transition from industrial land to a residential neighbourhood, the proposal adopts a co-located typology that integrates 100% Social Rent affordable housing with creative maker space workshops. This approach utilises an articulated plinth to navigate the topography, housing flexible, small to medium sized light industrial studios at the street level to activate the public realm and maintain the area's employment heritage.
- 16.19 The architectural language is characterised by a family of tall buildings on a podium composed of three distinct blocks, A1, A2, and A3 which are unified

by a common material palette of high-quality brickwork and a rhythmic, arched base that references the adjacent railway heritage and the existing arches of the North Camley Street bridge.

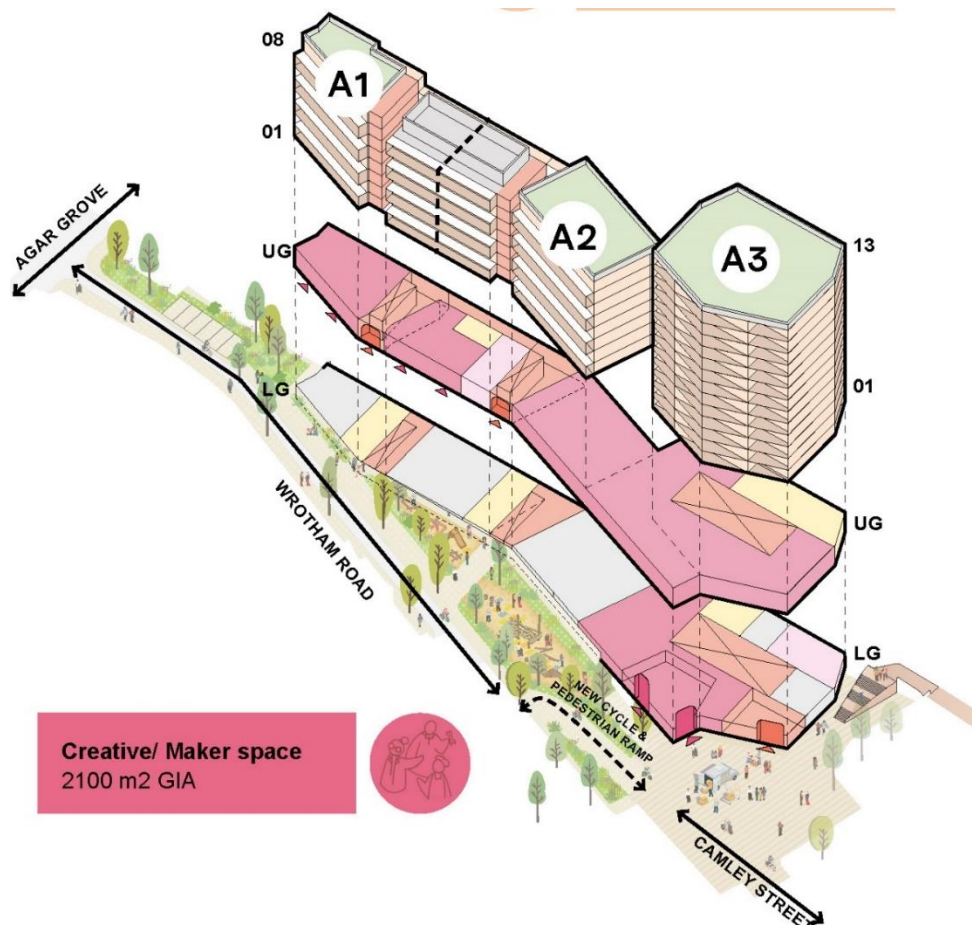


Figure 30 - Building organisation diagram

### **Layout, Scale and Massing**

- 16.20 The proposed layout for Site A shifts away from the existing isolated, below street level workshop configuration, introducing a permeable arrangement of three distinct blocks (A1, A2, and A3) that establishes a new urban grain at the northern end of Camley Street. Because Camley Street sits at a significantly lower level than Wrotham Road, the site strategy integrates a base plinth and strategic fill to manage these level changes. Block A3 and the maker spaces are consolidated at the lower Camley Street level to tie into the existing railway underpass and activate the public realm. To create a seamless transition to the Agar Grove Estate, the site is filled to match the higher Wrotham Road levels, which rise from +29.700 in the south to +32.900 in the north. Pedestrian and cycle permeability is managed through two primary routes: a shared sloped landscape ramp that provides an accessible north-south connection between the two levels, and a direct set of stairs for more immediate access to the Agar Grove Estate. Within the landscape and terraced seating in Camley Yard further manage these transitions, doubling as a functional space for makers. While pedestrian and cycle permeability is

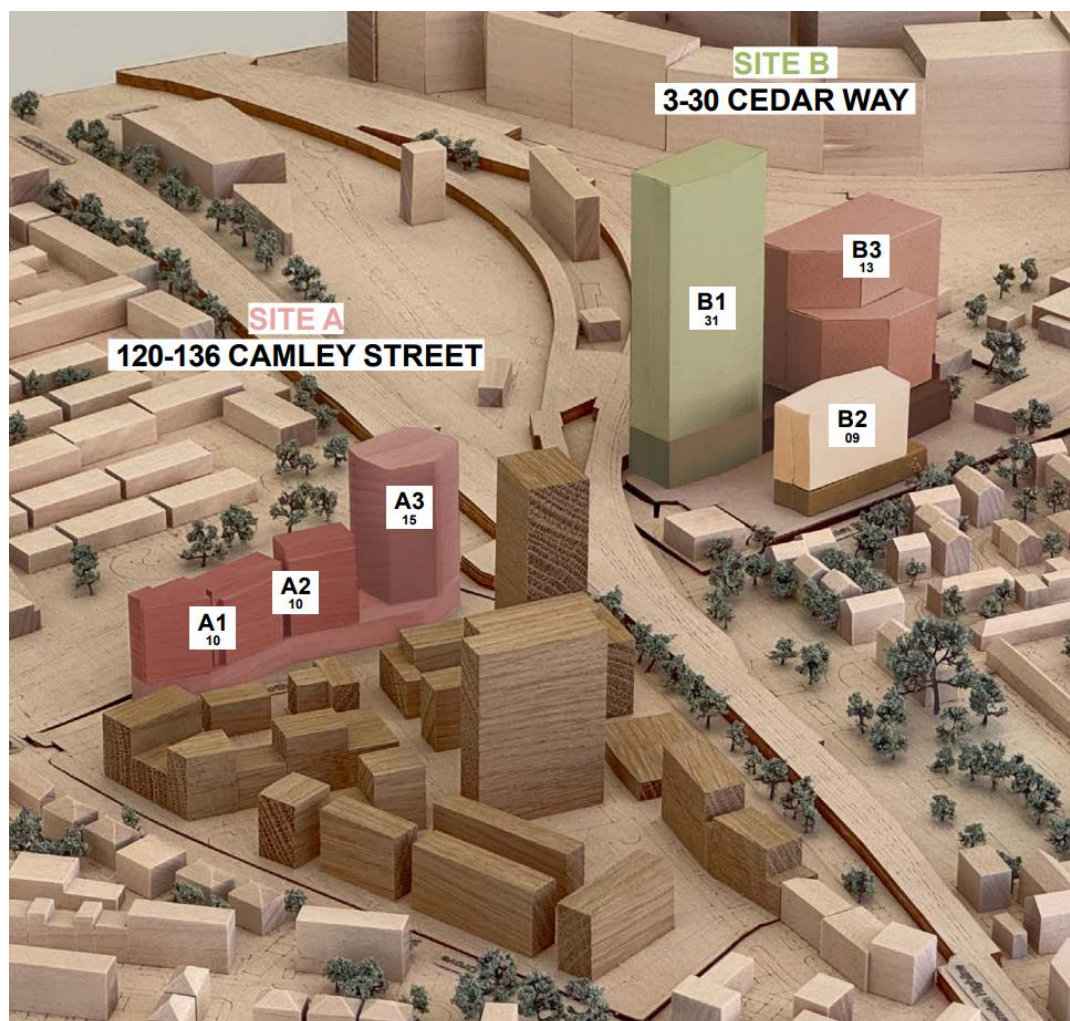
prioritised through sloped landscape paths that connect the site to Wrotham Road and the southern underpass, heavy vehicle servicing and accessible parking are located along the eastern boundary and Wrotham Road to minimise conflict with the public realm.



Figure 31 - Cross section of Site A demonstrating the sloped form of the site

- 16.21 The development adopts a tiered massing strategy that responds to the site's designation as a suitable location for tall buildings, with 12m-42m considered the potentially suitable height range. The massing is distributed across three primary volumes of between 10-15 storeys (35-52m) to reduce the sense of enclosure and maintain visual porosity toward the railway and the Camden Highline route. The tallest element (block A3 at 52m) is carefully positioned to respect the strategic London View Management Framework (LVMF) viewing corridor that crosses the site, ensuring that the development does not impede the protected vista. Additional height above the site designation follows an in depth understanding of the site and the contextual approach undertaken which ensures that the massing sits comfortably with the surrounding townscape and LVMF views. This has undergone rigorous testing with impacts on local and distant views carefully assessed and considered acceptable.





*Figure 32 - The Camley Street and Cedar Way sites in context, with Agar Grove in the foreground*

- 16.22 In order to mitigate the perceived scale, the blocks feature an expressive architectural language of bases, middles, and tops. The base is characterised by an arched rhythm that references the adjacent railway architecture, while the upper residential levels use horizontal brick coursing and inset balconies to break up the verticality. The roofscape is designed to be highly articulated, incorporating integrated plant enclosures and biodiverse green roofs that enhance the site's ecological value while preventing a monolithic profile when viewed from the surrounding residential context of Elm Village and Agar Grove.

***Appearance and architectural language***

- 16.23 The architectural language for Site A is structured around a clearly defined three part hierarchy (Fig. 32 above) consisting of an articulated plinth at the base, a repetitive body in the middle, and a distinctive crown at the top. This vertical organisation is unified by a uniform base that navigates the site's significant level changes, grounding the buildings and establishing a human scale at the street level where they interface with the public realm. The

arched rhythm of openings at ground floor is a direct reference to the adjacent Victorian railway arches and the articulated base of the neighbouring Agar Grove Estate, which frames large, glazed frontages to showcase the creative maker spaces and activate the pedestrian experience.

- 16.24 The body of the buildings employs a grid-based approach, using high-quality brickwork to create a sense of permanence and give the site a civic feel. This grid is further refined through horizontal projecting precast concrete banding elements and expressive brick detailing that distinguishes individual maisonettes and floors. To ensure a dynamic silhouette, the body of the blocks features circular columns that create a lighter, more porous appearance. Integrated signage strategy is seamlessly embedded within the precast concrete panels of the plinth, providing a consistent design without disrupting the architectural rhythm.
- 16.25 The tonal composition of Site A is designed to be complementary to the area context, using a material palette of brickwork that references the industrial heritage of Coal Drops Yard and the residential context of Camden Square. The final colour schemes remain subject to planning conditions, to ensure the highest quality execution. All rooftop plant enclosures are integrated into the crowns and screened by panels that match the primary facade logic ensuring the buildings maintain an articulated profile from long distance views.

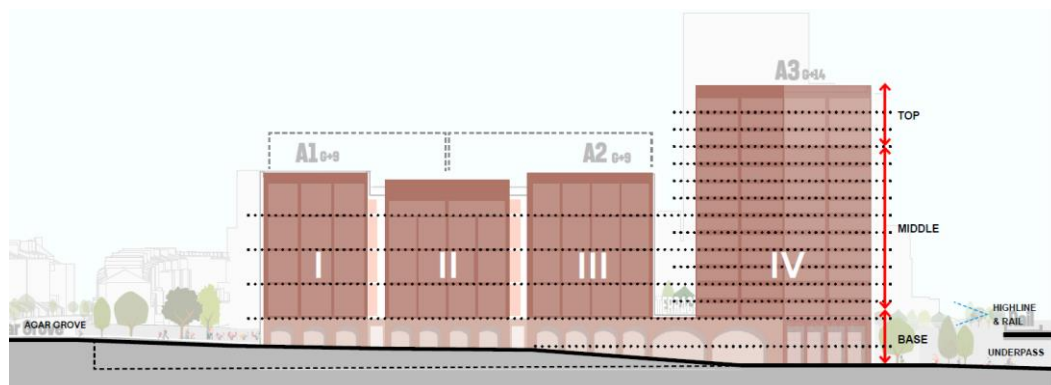


Figure 33 - Façade vertical modulation along Camley Street

### **A1 and A2 block**

- 16.26 The architectural quality of Buildings A1 and A2 is further enhanced by the well-designed integration of residential entrances within the building's plinth. Residential entrances to both blocks are deeply recessed, providing a sheltered threshold that mediates between the private home and the public sidewalk. The maker space units are located at the street level to create a vibrant, active frontage. The body of Buildings A1 and A2 is characterised by a series of double-height maisonettes that feature their own individual front door entrances directly from the gallery access routes. This design choice



fosters a sense of ownership and domesticity, grounding the larger blocks in a traditional street-based typology.

- 16.27 Architecturally, the double-height nature of these maisonettes allows for generous internal volumes and large-scale glazing that follows the rhythmic arched geometry of the base. This verticality is expressed on the facade through the use of double-height arched openings, which serve to unify the diverse uses of the plinth, balancing the industrial character of the maker spaces with the residential character of the family homes.



*Figure 34 - Double height nature of the maisonettes and the articulation on the façade above a plinth of arched openings*

- 16.28 The residential entrances for the upper-floor apartments are strategically located at the building corners and align with the gaps and open cores between the blocks to maximise natural surveillance over the new pedestrian routes. By intertwining the maker space entrances with these double-height residential frontages, Buildings A1 and A2 achieve a finer grain of development that replaces the previously impermeable industrial boundary with a safe, inviting, and highly articulated urban edge.



*Figure 35 - Residential entrance along Camley Street*

- 16.29 The termination of Blocks A1 and A2 is designed as a functional top that prioritises the concealment of building services while maintaining the rhythmic logic of the primary facade. Rather than serving as a dominant architectural feature, the crowns are characterised by their utility, primarily housing rooftop plant equipment within integrated enclosures. To prevent a monolithic appearance from distant heritage viewpoints, these enclosures utilise a perforated metal plant screen materiality. This choice of material ensures that the necessary mechanical ventilation and plant functions are screened by a lightweight, permeable layer that allows the building to terminate with a soft, articulated silhouette against the sky.
- 16.30 The visual interest of the upper facade is further refined through specific parapet articulation and material shifts between the structural piers. Between the primary vertical piers, brickwork panels are introduced to provide additional detailing and texture, enhancing the rhythmic quality of the upper elevations. These panels serve to break down the horizontal massing of the roofline, ensuring that the buildings maintain a consistent and well-proportioned top that aligns with the grid-led language of the middle body.

### **A3 block**

- 16.31 Building A3 which is 52m in height serves as a key architectural focal point at the southern end of the site, establishing the formal start of the Camley Street Spine and mediating the complex topography between the street level and the elevated railway. The building's design is defined by a strong hierarchy consisting of a robust arched plinth, a gridded body, and an articulated crown. The base of Building A3 features a rhythmic series of arched openings that directly reference the Victorian heritage of the adjacent North Camley Street bridge and the railway arches, providing a high-quality civic frontage for the ground-floor maker spaces. Above this plinth, the middle section of the building uses a grid-based facade in brickwork, where the horizontal and vertical piers are carefully proportioned to define the residential character of the upper floors. To ensure the building does not appear monolithic, the crown is designed with recessed textured brick panels and continuing rectangular piers from the round columns below that create a light silhouette against the sky.



*Figure 36 - Building A3 with 'crown' screening plant*

- 16.32 The successful integration of Building A3 into its context is entirely dependent on the quality of its execution and technical detailing; therefore, materiality and detailing should be secured via planning condition. Conditions should require the submission of technical details of the arched openings, the depth of window reveals, and the transition points between the brick body and precast concrete elements. Furthermore, the final colour tonality and material palette, intended to reference the industrial heritage of Coal Drops Yard and the residential context of Camden Square, must be verified through on-site mock-up panels. This conditional approach is essential to ensure that the Family of Buildings concept throughout both sites A and B is upheld and that Building A3 delivers the landmark design quality necessitated by its prominent gateway location.



- 16.33 The base of Building A3 features a deep, rhythmic colonnade that serves both a functional and an aesthetic role. Structurally, the colonnade is defined by a series of square brick columns that reference the industrial heritage of the nearby railway infrastructure. This sheltered walkway creates a generous, weather-protected threshold between the interior maker spaces and the new public square. By setting the glazing back behind these piers, the design allows for a clear visual connection to the creative workshops on the upper ground floor activities within to enliven the street scene.
- 16.34 The residential and maker space entrance for Building A3 is strategically positioned at the southwest corners to maximise natural surveillance and facilitate ease of access from the main pedestrian routes. The entrances are marked by a double-height volume and specialised signage areas integrated into the precast concrete panels. This high-level signage provides a clear marker for residents and visitors while maintaining the architectural rhythm of the plinth. Both entrances serve as an architectural feature using the same deep colonnade to create a formal and weather protected threshold. These entrances are characterised by high-quality glazed frontages, which provide a shopfront quality that showcases creative activities.



*Figure 37 - Colonnade on the Southwest corner of Building A3*

### ***Detailing and materials***

- 16.35 The architectural quality of the Site A development is underpinned by a robust and expressive material palette that references the industrial character of Coal Drops Yard, railway heritage and the residential context of the Agar Grove Estate and Camden Square. The buildings are defined by a clear hierarchy, starting with an articulated stretcher bond brickwork plinth at the base that creates a rhythmic series of arched openings. Glazed/Feature Stack Bonded Brickwork is applied to residential entrances and louvred panels to maker spaces. The detailing of this base is further refined by precast concrete primary and secondary bandings, which include lintels and

integrated signage zones, ensuring a consistent and ordered interface with the public realm.

- 16.36 The middle body of the residential blocks transitions to a grid-led facade primarily characterised by high-quality brickwork. A variety of textures and bonds are employed to break down the building's mass and provide visual interest; this includes the use of standard stretcher bond for primary surfaces, stack-bonded brickwork for detailing (inset 50mm) to create shadow lines, and hand-laid brick sawtooth bond feature panels to add tactile variety to specific bays. Fenestration is modelled within these bays, utilising aluminium spandrel panels, vertical louvres for integrated ventilation, and tilt-and-turn windows. Balconies are articulated with specialised PPC metal scalloped profiles, which serve as decorative dividers while maintaining the building's rigorous architectural logic.

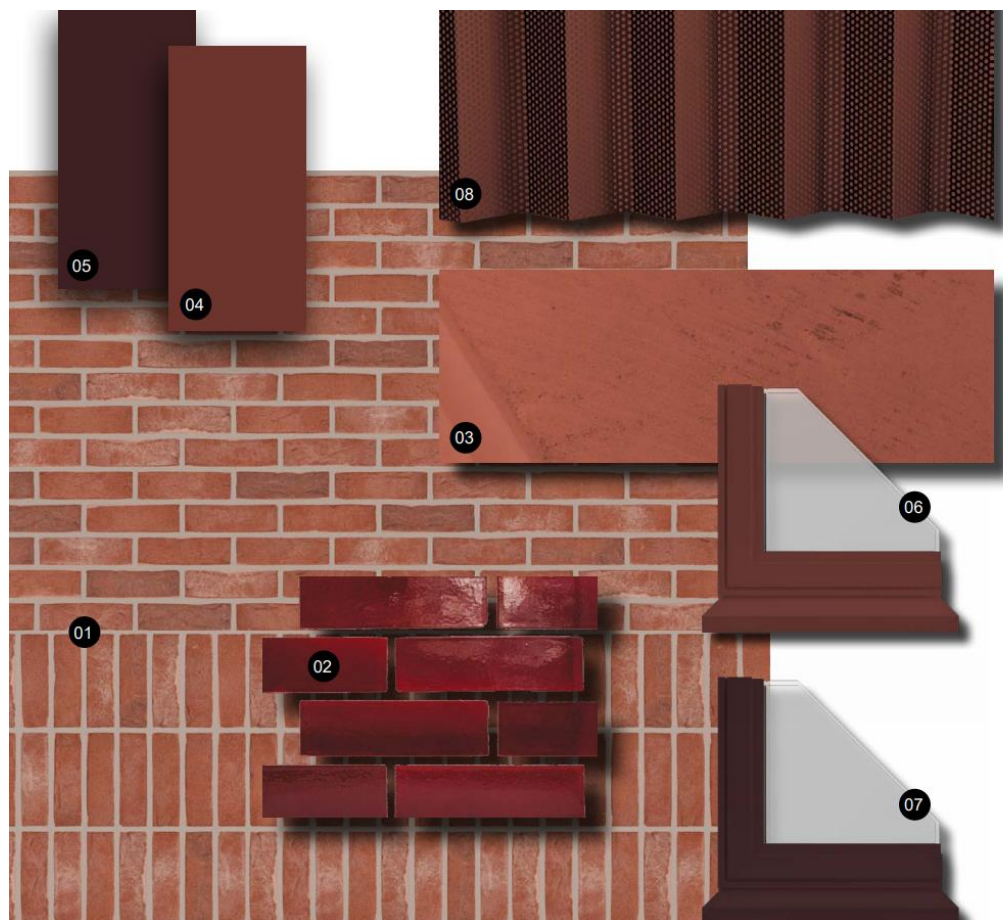


Figure 38 - High quality brick

- 16.37 The termination of the blocks is managed through functional parapet articulation rather than an overly expressive crown. Between the primary vertical piers, brickwork panels are introduced to enhance the texture and rhythm of the upper elevations. Rooftop plant equipment is discreetly housed within integrated enclosures and screened by perforated metal panels or louvres that align with the primary architectural grid. This strategy ensures the buildings maintain a clean, articulated silhouette that respects the

London View Management Framework and the surrounding Camden skyline. To ensure the landmark quality necessitated by the site's gateway location, all technical execution, including the precision of brick transitions and the depth of the window reveals, is to be strictly secured via planning conditions and on-site material samples.

***Public realm/Landscape***

- 16.38 The landscape and public realm strategy for Site A is designed to transform a currently insular industrial site into a highly permeable, green, and active urban quarter. Centred on the Camley Street Spine principle, the proposals bridge the level changes between the site, Agar Grove, and Wrotham Road, creating a series of tiered, high-quality spaces that prioritise pedestrian movement and soft landscaping.
- 16.39 The ground-floor public realm is anchored by Camley Yard, a significant new public space at the southern end of the site. This yard serves as a primary arrival point and a flexible social hub, bordered by the active frontages of the maker space units. The material palette utilising high-quality concrete paving blocks references the site's industrial heritage while ensuring a durable, accessible surface for all users. The sloped landscape routes and integrated seating areas are carefully positioned to navigate the site's 1:20 level change, ensuring that the development is fully inclusive and provides an intuitive wayfinding to the wider Camley Street masterplan. Stairs will connect the site to Maiden Lane and to the proposed Camden High Line.

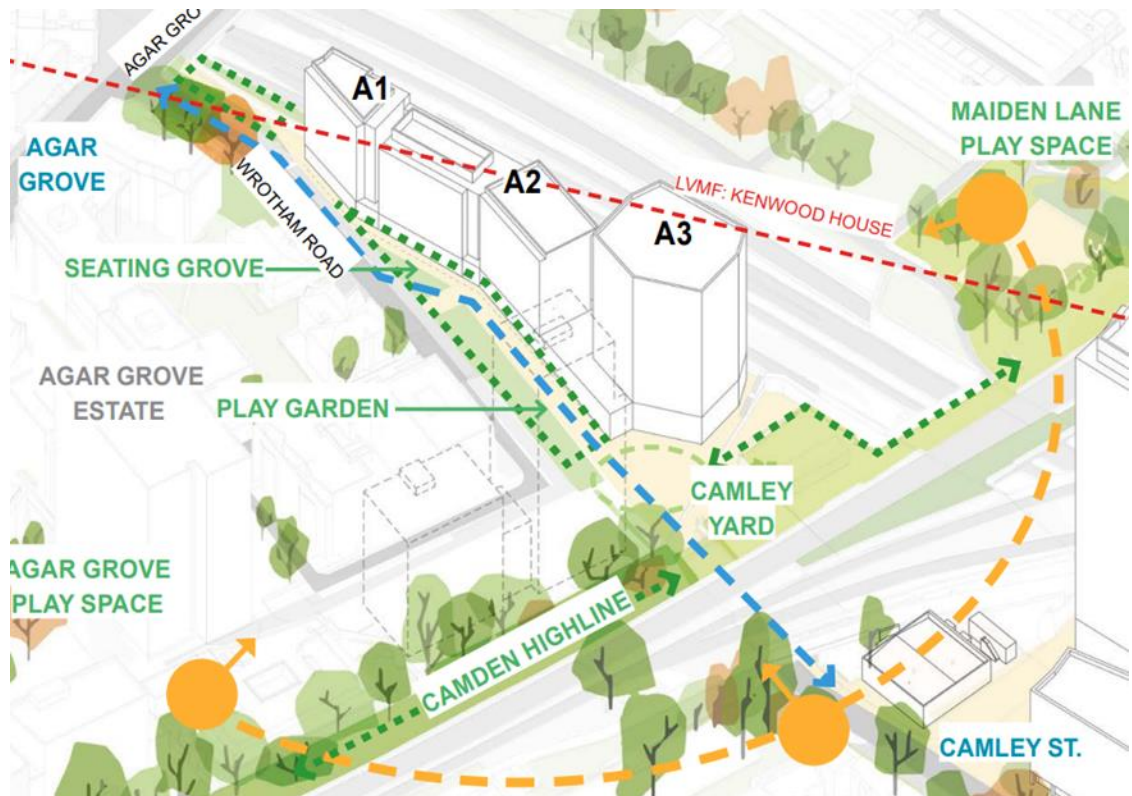


Figure 39 - Proposed public realm demonstrating the improved connections to Maiden Lane, the proposed Camden High Line and through the site to Agar Grove (and LVMF)

- 16.40 Play is integrated throughout the site through a play-along-the-way strategy, supplemented by a dedicated Play Garden located centrally within a more sheltered portion of the public realm. This area is designed to provide safe, secure play opportunities for younger children, featuring a mix of naturalistic play equipment and soft landscaping. Furthermore, Camley Yard to the east provides a quieter, more contemplative communal space (this space is for the workers and is not publicly accessible).
- 16.41 The landscape strategy extends vertically to the building's upper levels to maximize resident amenity and biodiversity. The roofs of Blocks A1, A2, and A3 are predominantly designated as biodiverse roofs. These are non-accessible areas designed to meet ecological requirements, featuring specialised substrates and planting to support local pollinators and bird populations.
- 16.42 The proposal includes a significant uplift in green cover through tree planting and extensive soft landscaping. New trees are located within the central landscape garden to provide visual softening, solar shading, and air quality improvements. The overall strategy ensures that Site A contributes to a cohesive, greener environment that integrates seamlessly with the ongoing Agar Grove redevelopment, providing a high-standard public realm that serves both new residents and the existing local community.



### ***Camden Design Review Panel (DRP)***

16.43 The design for Site A has been developed through a rigorous pre-application process, including a Full Review by the Camden Design Review Panel on 11 April 2025 and a second review in June 2025. The panel focused on the site's role as a gateway and its relationship with the Agar Grove estate. Regarding Site A specifically, the Panel commented:

- The panel supports the clear tripartite architectural expression of Site A, particularly the use of a robust masonry "base, middle, and top." The use of arched plinths is welcomed as a high-quality response to the local railway heritage and as a means of grounding the buildings within the public realm.
- The panel identifies Site A as a critical gateway at the north of Camley Street. They emphasise that because these blocks form the first impression of the development when approaching from the north, the material execution, specifically the brickwork detailing and precast concrete elements, must be of an exemplary standard to fulfil their landmark role.
- The colocation of maker spaces at the base of the residential blocks is strongly supported. The panel welcomes the high floor-to-ceiling heights and the permeability of the ground floor, noting that these active frontages are essential to transforming the character of the street.
- The panel acknowledges the design team's successful navigation of the significant site level changes through a series of sloped landscape routes. They support the play-along-the-way strategy but reiterate that the transition between Site A and the Agar Grove estate must feel seamless and intuitively connected.
- The panel emphasises that the success of the 100% Social Rent tenure on Site A depends on a fabric-first approach and the use of durable, low-maintenance materials that will age well over time.
- The panel welcomes the provision of the dedicated "Play Garden" and the residents' communal podium. However, they suggest that the materiality of the play equipment should lean towards natural textures to provide a softened contrast to the industrial character of the surrounding buildings.
- Would be beneficial to explore opportunities to redistribute massing and height across both sites. To improve the relationship with the existing homes to the west, the height of tower blocks beside the railway could be increased, and massing lowered elsewhere.
- Improvements to connectivity through the existing tunnels and the quality of the public realm sought.
- The emerging public realm and landscape design is engaging, but more thought is needed to address the needs of different user groups, including adults, children, teenagers, and employees, and the wider community.

- 16.44 Following this review, the design team refined the Site A proposals to ensure that the transition between the public maker Yard and the residential entrances is clearly demarcated while remaining inclusive. The perforated metal materiality for plant screening was also integrated as a direct response to the panel's request for a lighter termination to the buildings that does not compete with the primary masonry facade.
- 16.45 A second (and final) DRP took place on 13<sup>th</sup> June, with an updated masterplan presented. The Panel feedback for DRP 2 is summarised as follows:
- The proposed height and massing could be acceptable but should be tested in long views.
  - The public realm strategy for Camley Street is impressive, but an approach is also needed that will work if the wider vision cannot be delivered.
  - Site A has progressed positively. Heights, form and composition work well, and the introduction of space between Blocks A2 and A3 helps to vary massing.
  - The architectural approach has the potential to deliver a beautiful building, and the panel encourages continuing work to refine details. The quality of the arches will be particularly important.
  - Residential layouts are promising, but measures should be taken to ensure maker spaces offer a welcoming frontage to residents.
  - It is important to ensure the pedestrian overpass to the Maiden Lane Estate has natural surveillance to ensure it feels safe.
  - Further thinking is recommended to develop the design of play spaces to add greening and variety. Camley Yard should be separated into smaller areas to allow more varied use. Evening activation will be important, and the colonnade could help to provide this.
- 16.46 It is considered that the current proposals for Site A represent a sophisticated response to the DRP's requirements for gateway quality and functional integration.

### ***Conclusions***

- 16.47 The overall masterplan approach is strongly supported, featuring a family of tall buildings that optimise density while creating an exciting streetscape with new areas of public realm and routes on a north-south and east-west axis that better integrate the site into the surrounding area. The scheme closely aligns with the various policy requirements and guidance for this area. It is of utmost importance to secure high-quality materials and detailing through planning conditions and retention of the project architect.

## 17. IMPACT ON NEIGHBOURING AMENITY

17.1 CLP policies A1 and A4 and the Amenity CPG require consideration of the impact on the amenity of residential properties in the area, requiring careful consideration of the impacts of development on light, outlook, privacy and noise conditions. Impacts from construction works are also relevant and these will be considered in the 'Transport' section below.

17.2 LP policy D9 addresses tall buildings and says that daylight and sunlight conditions in the neighbourhood affected by such structures must be carefully considered.

### ***Daylight and sunlight***

17.3 Daylight, sunlight, overshadowing and solar glare is assessed in the Volume 2 Chapter 11 and the associated Chapter 4 Appendix G of the Environmental Statement submitted with the application. These documents detail the anticipated light-related impacts upon neighbouring properties and other receptors. The technical information in the report, as well as the methodology, has been reviewed for the council by an independent third-party assessor, Lichfield's.

17.4 As with proposed accommodation, the development plan supports the use of the BRE guidance for assessment purposes, however, it should not be applied rigidly and should be used to quantify and understand impact when making a balanced judgement.

17.5 Paragraph 130 of the NPPF supports making efficient use of land and says that authorities should take a flexible approach in applying policies or guidance relating to daylight/sunlight where they would otherwise inhibit making efficient use of a site, as long as the resulting scheme would provide acceptable living standards.

### **Methodology**

17.6 The report makes use of several metrics in its assessment of surrounding buildings which are described in the BRE guidance:

- **Vertical Sky Component (VSC)** – The daylight on the surface of a window. A measure of the amount of sky visible at the centre of a window.
- *The BRE considers daylight may be adversely affected if, after development, the VSC is both less than 27% and less than 0.8 times (a reduction of more than 20%) its former value.*
- **No Sky Line (NSL)**, also known as **Daylight Distribution (DD)** – The daylight penetration into a room. It measures the area at desk level ("a working plane") inside a room that will have a direct view of the sky.

- *The NSL figure can be reduced to 0.8 times its existing value (a reduction of more than 20%) before the daylight loss is noticeable.*
  - **Annual Probable Sunlight Hours (APSH)** - The amount of sunlight that windows of main living spaces within 90 degrees of due south receive and a measure of the number of hours that direct sunlight reaches unobstructed ground across the whole year and also as a measure over the winter period. The main focus is on living rooms.
  - *The BRE considers 25% to be acceptable APSH, including at least 5% during the winter months. If below this, impacts are noticeable if less than these targets, and sunlight hours are reduced by more than 4 percentage points, to less than 0.8 times their former value. It recommends testing living rooms and conservatories.*
  - **Sun-hours on Ground (SoG)**, also known as **Overshadowing** – The amount of direct sunlight received by open spaces.
- 17.7 *The BRE recommends at least half (50%) of the area should receive at least two hours (120 mins) of sunlight on 21 March (spring equinox), and the area which can receive some sun on 21 March is less than 0.8 times its former value.*
- 17.8 The Environmental Assessment considers development proposals on Sites A and B. Separate planning applications have been submitted concurrently for development on these two sites. However, it is expected that, should planning permission be granted for both, they would be built out at similar times. As such, three scenarios have been assessed with respect to daylight, sunlight, overshadowing and solar glare impacts – the development of Site A only (which is what this application is for), the development of Site B only (under the application which is item 2 on this agenda) and the development of both sites (so implementation of both applications), in accordance with the submitted proposals.
- 17.9 Below will primarily consider the potential cumulative impacts from the potential future development of both Site A and Site B, as this is the total cumulative impact from the perspective of neighbouring amenity impacts. However, reference will also be made to the impact from the proposed development Site A only.

#### Categorising impacts

- 17.10 The natural light effect on neighbouring properties has been categorised as follows:

BRE compliant	20.1% to 30% reduction	30.1% to 40% reduction	More than 40.1% reduction
Negligible effect	Minor adverse effect	Moderate adverse effect	Major adverse effect

Table 8 - Impact significance criteria

- 17.11 The BRE guidance targets are based on a model which is meant to apply broadly across the whole country, so it does not tend to account for much denser urban settings like London.
- 17.12 The approach is supported by the London Plan. The LP Housing SPG states:
- The degree of harm on adjacent properties and the daylight targets within a proposed scheme should be assessed drawing on broadly comparable residential typologies within the area and of a similar nature across London. Decision makers should recognise that fully optimising housing potential on large sites may necessitate standards which depart from those presently experienced but which still achieve satisfactory levels of residential amenity and avoid unacceptable harm.*
- 17.13 Lichfield's have noted that in urban areas like the application site minor and moderate adverse effects are to be expected, particularly on a site like this which is considered underutilised in comparison to neighbouring sites such as the Agar Grove Estate.
- Summary of impacts
- 17.14 The summary below includes figures for both proposed developments at Site A and Site B tested together (Scenario 1).
- 17.15 With the baseline (the existing position):
- 28 (31%) of the 90 properties tested across the studied properties will meet both the VSC and NSL base daylight criteria (27% VSC and 80% of room seeing direct sky view).
  - 40 (67%) of the 60 properties tested will meet the base sunlight criteria (25% APSH of which 5% occurs in winter).
  - With Scenario 1 (both Site A and Site B) in place:
  - 1675 (79%) of the 2128 windows tested will meet BRE Report guidance for VSC.
  - 1098 (89%) of the 1233 rooms tested will meet BRE Report guidance for NSL.
  - 705 (83%) of the 846 rooms tested will meet BRE Report guidance for APSH.
- 17.16 Overall, the analysis shows that for Scenario 1:
- 53 (59%) of the 90 properties studied will comply with BRE Report daylight (VSC and NSL) criteria (Negligible effect)
  - 43 (82%) of the 60 properties tested will comply with sunlight (APSH) criteria (Negligible effect)

- 17.17 Looking at the significance on a property-by-property basis, the assessment shows that:
- 69 properties (76.7%) will see either a Negligible or only Minor Adverse effect.
  - 5 properties (5.6%) will see predominantly Moderate Adverse effects.
  - 16 properties (17.8%) will see a predominantly Major Adverse effects.
- 17.18 The 23% of properties which would be moderately or majorly affected in terms of daylight and sunlight is indicative of the proposed changes in height and form that are proposed on the sites, which are currently single storey or double-height industrial units. The replacement of these units with buildings that optimise the development potential of the sites, and which include tall buildings, is inevitably likely to impact on provision of light to other accommodation nearby.
- 17.19 It is relevant to note that the above is a worst-case scenario focussed on developments on both Site A and Site B coming forward. When considering Site A alone the day/sunlight analysis identifies only four (4.5%) properties which would be majorly affected and none that would see a moderate adverse effect.

#### Daylight and sunlight impacts

- 17.20 Based on Scenario 1 of Site A and Site B being built out together many of the surrounding buildings or groups of buildings would experience either a negligible impact or minor adverse impact which is considered acceptable in the context of such comprehensive redevelopment schemes in an urban area and are therefore not discussed further.
- 17.21 The remaining buildings or groups of buildings that would experience moderate or major negative daylight effects are referenced below.
- Agar Grove Estate - Block C/D*
- 17.22 Block C/D on Agar Grove is to the west of Blocks A1-A3 on Site A. Daylight has been assessed to 71 windows serving 36 rooms in this residential building. The VSC and NSL impacts would be within the BRE guidelines to 29 windows (41%) and 23 rooms (64%) respectively.
- 17.23 Of the 42 windows that would be outside the VSC guidelines, the magnitudes of impact would be minor adverse for three windows and major adverse for 39 windows. Of the 13 rooms that would be outside the NSL guidelines, the magnitudes of impact would be minor adverse for seven rooms, moderate adverse for four rooms and major adverse for two rooms.
- 17.24 The residual VSC values for the adversely affected windows would range from 0.3% to 22.1%, with an average of 11.2%. The residual NSL values for the adversely affected rooms would range from 47% to 77%, with an average



of 62%. The affected rooms are understood to be an LD (living/diner), a KD (kitchen/diner), five LKDs (living/kitchen/diner) and six bedrooms.

- 17.25 Sunlight has been assessed to 29 rooms in this residential building. The sunlight impacts would be within the BRE guidelines (annual and winter) to five rooms (17%) and outside the guidelines to 24 rooms. The 24 rooms that would be outside the annual sunlight guidelines would experience major adverse impacts. Of the 20 rooms that would be outside the winter sunlight guidelines, the magnitudes of impact would be moderate adverse for three and major adverse for 17 rooms. Whilst there are major adverse effects, some of which affect primary living areas, 19 of these rooms will continue to receive levels of annual sunlight ranging from 14% and above, which is considered reasonable for an urban location.
- 17.26 It should be noted that this property is located directly to the west of Site A, which in the baseline condition is low-rise. It should also be noted that there are several windows located beneath enclosed balconies within this property which restrict sky visibility and access to direct sunlight, making the windows in question sensitive daylight receptors.
- 17.27 Floor plans indicate that the main living areas are served by multiple windows. This means that, in the proposed condition, these rooms will continue to benefit from good overall levels of amenity, with reasonable views of the sky.
- 17.28 Only three main living areas will have proposed sunlight levels that are considered low. However, these spaces already have low sunlight levels in the existing condition due to balcony obstructions. As a result, the overall effect from the proposed development is not considered significant.
- 17.29 The significance of the daylight and sunlight effects would be major adverse, which conflict with the aims of CLP policy A1. The building is shown as number 3 in the image below.



Figure 40 - Block C/D (3 above), Flats A-M Ferndown (6) & 1-2 Cranbourne (8&9)

#### *Agar Grove Estate - Flats A-M Ferndown*

- 17.30 Flats A-M Ferndown are also located to the west of Blocks A1-A3 on Site A. Daylight has been assessed to 99 windows serving 44 rooms in this residential building. The VSC and NSL impacts would be within the BRE guidelines to 53 windows (54%) and 35 rooms (80%) respectively. It should be noted that this property is located directly to the west of Site A, the baseline condition of which is low rise. It should also be noted that the residential units within this property are dual aspect, receiving light not only through site-facing windows orientated due-east but also through windows orientated due-north and due-south.
- 17.31 Of the 46 windows that would be outside the VSC guidelines, the magnitudes of impact would be minor adverse for 10 windows, moderate adverse for 10 windows and major adverse for 26 windows. The nine rooms that would be outside the NSL guidelines would experience major adverse impacts. The residual VSC values for the adversely affected windows would range from 5.9% to 26.6%, with an average of 16.2%. The residual NSL values for the adversely affected rooms would range from 22% to 48%, with an average of 35%. The affected rooms are understood to be four living rooms, a kitchen and four bedrooms.
- 17.32 Sunlight has been assessed to 32 rooms in this residential building. The sunlight impacts would be within the BRE guidelines (annual and winter) to 15 rooms (47%) and outside the guidelines to 17 rooms. Of the 11 rooms

that would be outside the annual sunlight guidelines, the magnitudes of impact would be moderate adverse for one and major adverse for 10 rooms. The 12 rooms that would be outside the winter sunlight guidelines would experience major adverse impacts.

- 17.33 The residual annual sunlight values for the adversely affected rooms would range from 7% to 20%, with an average of 15.2%. The residual winter sunlight values for the adversely affected rooms would range from zero to 4%, with an average of 2.1%. The affected rooms are understood to be six living rooms, a kitchen and 10 bedrooms.
- 17.34 All assessed flats are dual aspect, and the retained daylight levels across the building as a whole are considered reasonable and broadly comparable to those typically found in an urban London context.
- 17.35 The significance of the sunlight effects would be major adverse. The significance of the daylight effects would also be major adverse, which conflicts with the aims of CLP policy A1. The building is shown as number 6 in the image above.

*Agar Grove Estate – 1 Cranbourne*

- 17.36 1 Cranbourne is also located to the west of Blocks A1-A3 on Site A. Daylight has been assessed to 15 windows serving five rooms in this residential house. The VSC and NSL impacts would be within the BRE guidelines to 12 windows (80%) and three rooms (60%) respectively. It should be noted that this property is located directly to the west of Site A, which in the existing baseline is low-rise. This property also contains windows located beneath or next to an overhanging canopy, which limits sky visibility and as a result of this, the respective windows achieve low absolute values in the baseline condition. This residential unit is triple aspect, receiving light not only through Site-facing windows orientated due-east, but also through windows facing due-north, and due-west which are not affected.
- 17.37 The residual VSC values for the adversely affected windows would range from 11.8% to 15%, with an average of 13.4%. The residual NSL values for the adversely affected rooms would range from 55% to 62%, with an average of 59%. The affected room type is understood to be two bedrooms.
- 17.38 Sunlight has been assessed to four rooms in this residential building. The sunlight impacts would be within the BRE guidelines (annual and winter) to two rooms (50%) and outside the guidelines to two rooms. The two rooms that would be outside the annual sunlight guidelines would experience major adverse impacts. The residual annual sunlight values for the adversely affected rooms would both be 13%. The affected room type is understood to be two bedrooms.

- 17.39 The significance of the daylight effects would be major adverse, and the sunlight effects would also be major adverse, which conflicts with the aims of CLP policy A1. The building is shown as number 9 in the image above.

*Agar Grove Estate – 2 Cranbourne*

- 17.40 2 Cranbourne is also located to the west of Blocks A1-A3 on Site A. Daylight has been assessed to 26 windows serving five rooms in this residential house. The VSC and NSL impacts would be within the BRE guidelines to 17 windows (65%) and two rooms (40%) respectively. It should be noted that this property is located directly to the west of Site A, which in the existing baseline is low-rise. This residential unit is also dual aspect, receiving light not only via Site-facing windows orientated due-east, but also via windows orientated due-west, which are not affected.
- 17.41 Of the nine windows that would be outside the VSC guidelines, the magnitudes of impact would be minor adverse for one window and major adverse for eight windows. The three rooms that would be outside the NSL guidelines would experience major adverse impacts. The residual VSC values for the adversely affected windows would range from 4.6% to 18%, with an average of 11.3%. The residual NSL values for the adversely affected rooms would range from 23% to 46%, with an average of 35%. The affected rooms are understood to be a kitchen and two bedrooms.
- 17.42 Sunlight has been assessed to five rooms in this residential building. The sunlight impacts would be within the BRE guidelines (annual and winter) to four rooms (80%) and outside the guidelines to one room. It should be noted that a window serving the kitchen within this property is situated adjacent to the overhanging canopy at 3 Cranbourne Agar Grove. This canopy restricts sunlight access from the south, making the window in question an extremely sensitive sunlight receptor.
- 17.43 The one room that would be outside the annual and winter sunlight guidelines would experience a major adverse impact. The residual annual sunlight value for the adversely affected room would be 18%. The residual winter sunlight value for the adversely affected room would be 4%. The affected room type is understood to be a kitchen.
- 17.44 The significance of the daylight effects would be major adverse, which conflicts with the aims of CLP policy A1. The sunlight impacts would be minor adverse. The building is shown as number 8 in the image above.

*216-230 Barker Drive*

- 17.45 This block is located south of the railway lines to the north-west of Site B (south-west of Site A). Daylight has been assessed to 19 windows serving 16 rooms in this residential building. The VSC and NSL impacts would be within the BRE guidelines to three windows (16%) and nine rooms (56%) respectively.

- 17.46 Of the 16 windows that would be outside the VSC guidelines, the magnitudes of impact would be minor adverse for one window and moderate adverse for 15 windows. Of the seven rooms that would be outside the NSL guidelines, the magnitudes of impact would be minor adverse for four rooms and moderate adverse for three rooms. The residual VSC values for the adversely affected windows are good for an urban location and would range from 14.6% to 26.6%, with an average of 20.6%. The residual NSL values for the adversely affected rooms would range from 58% to 74%, with an average of 66%. The affected rooms are understood to be four living rooms, a kitchen, an LKD and a bedroom.
- 17.47 Sunlight has been assessed to 16 rooms in this residential building. The sunlight impacts would be within the BRE guidelines (annual and winter) to three rooms (19%) and outside the guidelines to 13 rooms. The 12 rooms that would be outside the annual sunlight guidelines would experience major adverse impacts. The 12 rooms that would be outside the winter sunlight guidelines would experience major adverse impacts. The residual annual sunlight values for the adversely affected rooms would range from 4% to 21%, with an average of 14.5%. The residual winter sunlight values for the adversely affected rooms would range from 0% to 3%, with an average of 0.8%. The affected rooms are understood to be four living rooms, seven kitchens, an LKD and a bedroom.
- 17.48 While major adverse effects are recorded, this is due not only to the Proposed Development but also to the east-facing orientation of the building, which naturally reduces morning sunlight potential. Despite this, for all but three potential living areas, the retained levels of annual sunlight remain reasonable for an urban location, with at least 10% APSH retained, and many windows achieving significantly higher levels. For the three living rooms that fall below this threshold, it is notable that these rooms already do not comply with BRE guidelines in the existing condition, and some annual sunlight will still be maintained. This represents a small minority of rooms, and it is likely that other windows within these flats will receive higher levels of sunlight.
- 17.49 Given that this block is located directly opposite the tower element of the Proposed Development, albeit at a relatively large distance, it is somewhat inevitable that there will be reductions in sunlight where a taller building is introduced east of a neighbouring property, even at a significant distance.
- 17.50 The significance of the daylight effects would be permanent likely major adverse for daylight and a major adverse impact for sunlight, which conflicts with the aims of CLP policy A1. The building is shown as number 31 in the image below.



Figure 41 - 216-230 Barker Drive (marked 31)

#### 232-246 Barker Drive

- 17.51 This block is also located south of the railway lines to the north-west of Site B (south-west of Site A). Daylight has been assessed to 20 windows serving 15 rooms in this residential building. The VSC and NSL impacts would be within the BRE guidelines to four windows (20%) and five rooms (33%) respectively.
- 17.52 Of the 16 windows that would be outside the VSC guidelines, the magnitudes of impact would be moderate adverse for seven windows and major adverse for nine windows. Of the 10 rooms that would be outside the NSL guidelines, the magnitudes of impact would be minor adverse for three rooms, moderate adverse for four rooms and major adverse for three rooms. The residual VSC values for the adversely affected windows are good and would range from 16.1% to 23.8%, with an average of 19.9%. The residual NSL values for the adversely affected rooms would range from 50% to 71%, with an average of 60%. The affected rooms are understood to be seven kitchens and three living rooms.
- 17.53 Sunlight has been assessed to 15 rooms in this residential building. The sunlight impacts would be within the BRE guidelines (annual and winter) to 13 rooms (87%) and outside the guidelines to two rooms. The two rooms that would be outside the annual sunlight guidelines would experience major adverse impacts. The residual annual sunlight values for the adversely



affected rooms would both be 19%. The affected room type is understood to be two kitchens.

- 17.54 The significance of the daylight effects would be major adverse, which conflicts with the aims of CLP policy A1. The significance of the sunlight effects would be minor adverse. The building is shown as number 32 in the image above.

*4 Weavers Way*

- 17.55 This property is located west of Site B. Daylight has been assessed to six windows serving three rooms in this residential building. The VSC and NSL impacts would be within the BRE guidelines to six windows (100%) and two rooms (67%) respectively.

- 17.56 The VSC impacts on all windows would be within the BRE guidelines. The one room that would be outside the NSL guidelines would experience a moderate adverse impact. The residual NSL value for the adversely affected room would be 56%. The affected room type is understood to be a bedroom. Sunlight impacts on this property are negligible.

- 17.57 The significance of the daylight effects would be moderate adverse, which conflicts with the aims of CLP policy A1. The building is shown as number 40 in the image above.

*6 Weavers Way*

- 17.58 This property is located west of Site B. Daylight has been assessed to six windows serving three rooms in this residential building. The VSC and NSL impacts would be within the BRE guidelines to six windows (100%) and two rooms (67%) respectively.

- 17.59 The VSC impacts on all windows would be within the BRE guidelines. The one room that would be outside the NSL guidelines would experience a moderate adverse impact. The residual NSL value for the adversely affected room would be 65%. The affected room type is understood to be a bedroom. Sunlight impacts on this property are negligible.

- 17.60 The significance of the daylight effects would be major adverse, which conflicts with the aims of CLP policy A1. The building is shown as number 41 in the image above.

*8 Weavers Way*

- 17.61 This property is located west of Site B. Daylight has been assessed to two windows serving two rooms in this residential building. The VSC and NSL impacts would be within the BRE guidelines to two windows (100%) and one room (50%) respectively.

- 17.62 The VSC impacts on all windows would be within the BRE guidelines. The one room that would be outside the NSL guidelines would experience a moderate adverse impact. The residual NSL value for the adversely affected room would be 62%. Sunlight impacts on this property are negligible.
- 17.63 The significance of the daylight effects would be major adverse, which conflicts with the aims of CLP policy A1. The building is shown as number 42 in the image above.

*123-137 Barker Drive*

- 17.64 This property is located west of Site B. Daylight has been assessed to 16 windows serving 16 rooms in this residential building. The VSC and NSL impacts would be within the BRE guidelines to no windows (0%) and seven rooms (44%) respectively.
- 17.65 Of the 16 windows that would be outside the VSC guidelines, the magnitudes of impact would be moderate adverse for 15 windows and major adverse for one window. Of the nine rooms that would be outside the NSL guidelines, the magnitudes of impact would be minor adverse for one room, moderate adverse for four rooms and major adverse for four rooms. The residual VSC values for the adversely affected windows are good for an urban location and would range from 12.5% to 23.4%, with an average of 18%. The residual NSL values for the adversely affected rooms would range from 41% to 73%, with an average of 57%. The affected room type is understood to be nine bedrooms.
- 17.66 Sunlight has been assessed to 16 rooms in this residential building. The sunlight impacts would be within the BRE guidelines (annual and winter) to seven rooms (44%) and outside the guidelines to nine rooms. Of the six rooms that would be outside the annual sunlight guidelines, the magnitudes of impact would be minor adverse for one room, moderate adverse for three rooms and major adverse for two rooms. Of the seven rooms that would be outside the winter sunlight guidelines, the magnitudes of impact would be minor adverse for one room, moderate adverse for two rooms and major adverse for four rooms.
- 17.67 The residual annual sunlight values for the adversely affected rooms would range from 13% to 23%, with an average of 18.3%. The residual winter sunlight values for the adversely affected rooms would range from 0% to 4%, with an average of 2%. The affected room type is understood to be nine bedrooms.
- 17.68 The significance of the daylight effects would be major adverse, which conflicts with the aims of CLP policy A1. The significance of the sunlight effects would be minor adverse. The building is shown as number 51 in the image above.

#### *17-31 Weavers Way*

- 17.69 This property is located west of Site B. Daylight has been assessed to 20 windows serving 16 rooms in this residential building. The VSC and NSL impacts would be within the BRE guidelines to two windows (10%) and four rooms (25%) respectively. It should be noted that this property is located directly to the west of Site B, the baseline condition of which is low-rise.
- 17.70 Of the 18 windows that would be outside the VSC guidelines, the magnitudes of impact would be minor adverse for two windows and major adverse for 16 windows. The 12 rooms that would be outside the NSL guidelines would experience major adverse impacts. The residual VSC values for the adversely affected windows would range from 9% to 26.4%, with an average of 17.7%. The retained levels of VSC remain good overall, with the vast majority of windows maintaining at least 15% VSC, which, as previously explained, is considered a reasonable level for urban London. A smaller proportion of windows fall below this threshold, and of the 20 assessed windows, only two have VSC levels of 9% in the proposed condition. It is believed that these two windows likely serve kitchens.
- 17.71 The residual NSL values for the adversely affected rooms would range from 19% to 57%, with an average of 38%. The affected rooms are assumed to be four living rooms and eight kitchens. Views of the sky will be maintained in all rooms.
- 17.72 Sunlight has been assessed to 16 rooms in this residential building. The sunlight impacts would be within the BRE guidelines (annual and winter) to 13 rooms (81%) and outside the guidelines to three rooms. The three rooms that would be outside the annual sunlight guidelines would experience major adverse impacts. The residual annual sunlight values for the adversely affected rooms would range from 17% to 22%, with an average of 18.7%. The affected rooms are assumed to be a living room and two kitchens.
- 17.73 The significance of the daylight effects would be major adverse, which conflicts with the aims of CLP policy A1. The significance of the sunlight effects would be minor adverse. The building is shown as number 54 in the image above.

#### *33-55 Weavers Way*

- 17.74 This property is also located west of Site B. Daylight has been assessed to 32 windows serving 32 rooms in this residential building. The VSC and NSL impacts would be within the BRE guidelines to 16 windows (50%) and 22 rooms (69%) respectively. It should be noted that this property is located directly to the west of Site B, which in the baseline condition comprises low-rise buildings. As a result, the property currently benefits from unusually high overall levels of daylight. However, as the property is enclosed on one side

by the neighbouring block, sky visibility to some of its windows is restricted, resulting in low baseline VSC values for those specific windows.

- 17.75 Of the 16 windows that would be outside the VSC guidelines, the magnitudes of impact would be moderate adverse for two windows and major adverse for 14 windows. Of the 10 rooms that would be outside the NSL guidelines, the magnitudes of impact would be minor adverse for one room, moderate adverse for three rooms and major adverse for six rooms. The residual VSC values for the adversely affected windows would range from 2.5% to 19.8%, with an average of 11.1%. 11 of the 16 affected windows will retain values ranging from 10.3% to 19.7% with an average of 14.6%. The remaining five windows will retain values ranging from 2.5% to 9.7%. These windows each serve bedrooms and it should be noted that the BRE guidelines advise that daylight to bedrooms is less important.
- 17.76 The residual NSL values for the adversely affected rooms would range from 15% to 69%, with an average of 42%. The affected rooms are assumed to be four living rooms, four kitchens and two bedrooms. The residual VSC and NSL values for this building are expected to align with conditions typically seen in other major London developments, where reasonable site optimisation is expected.
- 17.77 Sunlight has been assessed to 24 rooms in this residential building. The sunlight impacts would be within the BRE guidelines (annual and winter) to 18 rooms (75%) and outside the guidelines to six rooms. The five rooms that would be outside the annual sunlight guidelines would experience major adverse impacts. Of the five rooms that would be outside the winter sunlight guidelines, the magnitudes of impact would be moderate adverse for one room and major adverse for four rooms.
- 17.78 The residual annual sunlight values for the adversely affected rooms would range from 7% to 21%, with an average of 16.4%. The residual winter sunlight values for the adversely affected rooms would range from 0% to 2%, with an average of 1.2%. The affected rooms are assumed to be two living rooms and four kitchens.
- 17.79 The significance of the daylight effects would be major adverse, which conflicts with the aims of CLP policy A1. The significance of the sunlight effects would be minor adverse. The building is shown as number 55 in the image above.
- 57-63 Weavers Way*
- 17.80 This property is also located west of Site B. Daylight has been assessed to 16 windows serving 16 rooms in this residential building. The VSC and NSL impacts would be within the BRE guidelines to eight windows (50%) and 15 rooms (94%) respectively.

17.81 Of the eight windows that would be outside the VSC guidelines, the magnitudes of impact would be minor adverse for one window, moderate adverse for five windows and major adverse for two windows. The one room that would be outside the NSL guidelines would experience a minor adverse impact. The residual VSC values for the adversely affected windows would range from 13% to 25.1%, with an average of 19%. The residual NSL value for the adversely affected room would be 76%. The affected room type is understood to be a kitchen. The sunlight impacts on this property would be negligible.

17.82 The significance of the daylight effects would be major adverse, which conflicts with the aims of CLP policy A1. The building is shown as number 56 in the image above.

*65-87 Weavers Way*

17.83 This property is also located west of Site B, although further to the south opposite the junction with Cedar Way. Daylight has been assessed to 32 windows serving 24 rooms in this residential building. The VSC and NSL impacts would be within the BRE guidelines to 10 windows (31%) and 23 rooms (96%) respectively.

17.84 Of the 22 windows that would be outside the VSC guidelines, the magnitudes of impact would be minor adverse for 11 windows and moderate adverse for 11 windows. The one room that would be outside the NSL guidelines would experience a minor adverse impact. The residual VSC values for the adversely affected windows would range from 18.7% to 27%, with an average of 22.9%. The residual NSL value for the adversely affected room would be 74%. The affected room type is understood to be a kitchen. The sunlight impacts on this property would be negligible.

17.85 The significance of the daylight effects would be major adverse, which conflicts with the aims of CLP policy A1. The building is shown as number 65 in the image above.

*81-87 Crofters Way*

17.86 This property is located south-west of Site B. Daylight has been assessed to 32 windows serving 24 rooms in this residential building. The VSC and NSL impacts would be within the BRE guidelines to 10 windows (31%) and 23 rooms (96%) respectively. Daylight has been assessed to eight windows serving eight rooms in this residential building. The VSC and NSL impacts would be within the BRE guidelines to no windows (0%) and six rooms (75%) respectively.

17.87 Of the eight windows that would be outside the VSC guidelines, the magnitudes of impact would be minor adverse for two windows and moderate adverse for six windows. The two rooms that would be outside the NSL guidelines would experience minor adverse impacts. The residual VSC

values for the adversely affected windows would range from 20.9% to 26.7%, with an average of 23.8%. The residual NSL values for the adversely affected rooms would range from 72% to 74%, with an average of 73%. The affected room type is assumed to be two living rooms. The sunlight impacts on this property would be negligible.

- 17.88 The significance of the daylight effects would be major adverse, which conflicts with the aims of CLP policy A1. The building is shown as number 71 in the image below.



Figure 42 - 81-87 Crofters Way (marked 71)

#### *65-79 Crofters Way*

- 17.89 This property is also located south-west of Site B. Daylight has been assessed to 16 windows serving 16 rooms in this residential building. The VSC and NSL impacts would be within the BRE guidelines to two windows (12%) and eight rooms (50%) respectively.
- 17.90 Of the 14 windows that would be outside the VSC guidelines, the magnitudes of impact would be minor adverse for 10 windows and moderate adverse for four windows. Of the eight rooms that would be outside the NSL guidelines, the magnitudes of impact would be minor adverse for three rooms and moderate adverse for five rooms. The residual VSC values for the adversely affected windows would range from 21.5% to 26.4%, with an average of 24%. The residual NSL values for the adversely affected rooms would range from 59% to 75%, with an average of 67%. The affected room type is assumed to be eight living rooms. The sunlight impacts on this property would be negligible.



- 17.91 The significance of the daylight effects would be permanent and major adverse, which conflicts with the aims of CLP policy A1. The building is shown as number 72 in the image above.

#### Solar Glare

- 17.92 The solar glare test is not generally a comparative one so there is no baseline assessment in this instance. It assesses the potential for reflected solar glare to occur in the completed development scenario. For the purposes of the assessment, the façade materials that are assumed to have the potential to reflect sunlight are the glazing and frames to the windows and winter gardens and any metal window details such as spandrel panels, balcony balustrades and plant screening. The solar glare assessment treats any potentially reflective elements as fully reflective mirrors whereas, in reality, many of these elements are unlikely to be highly reflective. Accordingly, the solar glare assessment is considered to present the worst-case potential impacts.
- 17.93 For Scenario 1 (proposed developments for Site A and Site B together) 24 viewpoints on nearby roads and railways were tested. 11 viewpoints were noted not to be significantly affected (negligible impact). The other 13 were affected by way of minor or moderate impacts.
- 17.94 The majority of impacts occurring to road users could be mitigated by the use of in car visors. However, further investigation will be required to determine the intensity of the instances, whether such mitigation is adequate in all cases and whether other forms of mitigation need to be considered.
- 17.95 The solar glare assessment also shows that there are significant prolonged instances of solar reflection within 30 degrees of the centre of view of train drivers. These instances will need to be studied further to establish if the intensity of the reflection will lead to instances where train drivers are unable to read and react to signals. These studies will need to be discussed with the Network Rail and TfL Asset Protection teams to determine adequate mitigation measures.
- 17.96 Lichfield's have reviewed the solar glare studies and have stated that any mitigations required will most likely be of the form of modifications to the glazing specifications and will have no impact on the form of the proposed development. As such, it is considered that solar glare impacts are a matter that can be investigated further and mitigated as appropriate through condition.

#### Overshadowing

- 17.97 The proposed sun on ground test was run for gardens and spaces around the sites, and they were assessed for their quality on 21 March (spring equinox). The combined development in Scenario 1 (Site A and Site B

combined) would have little material impact on the sunlight access to most of the tested spaces.

- 17.98 In total 31 of the 33 tested spaces would meet the BRE guidance i.e. retaining at least 2 hours of sun in excess of 50% of their respective areas or, where already below this level in the existing baseline, retaining at least 0.8 times the former value target. Only one space (adjacent to Flats A-M Ferndown on the Agar Grove Estate) would be affected to any meaningful extent beyond the recommendations set by the BRE. This impact is classed as moderate adverse but is tempered by the significant sunlight access afforded in the summer months.
- 17.99 Overall, whilst the effect is considered noteworthy, it would not require mitigation. Therefore, the development is considered acceptable in terms of its overshadowing impacts.

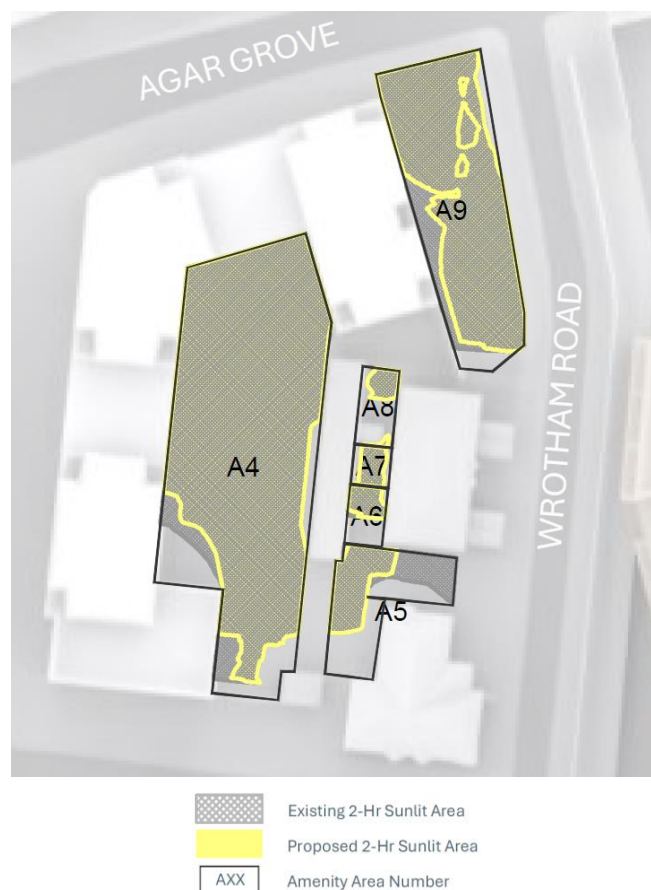


Figure 43 - Overshadowing plan showing most affected amenity space at A-M Ferndown (A5)

#### Conclusion – Daylight and sunlight

- 17.100 Whilst many of the impacts on surrounding properties are notable, most would be commensurate with the local context and the nature of the site as a currently underutilised site in an urbanised part of Central London, and also noting the site's designation as an allocated site in the draft Local Plan, the

need to optimise development on available sites in urban areas and the significant need to deliver housing.

*Site A: Impact*

- 17.101 When considering Site A alone the day/sunlight analysis identifies only four (4.5%) properties which would be majorly affected and none that would see a moderate adverse effect. This is a very low impact generally considering the scale of the development proposed and its siting in an urban area.

*Cumulative (Site A and Site B): Impact*

When assessing the proposals of both Site A and Site B being developed in accordance with the currently submitted planning applications, only 23% of properties assessed would see a moderate or major impact, as explained in the sections above. This degree of impact is considered acceptable, given the proposed increase in scale and massing at the sites and the need to optimise the development of the sites. Nonetheless, the impact on these properties would conflict with the part of Policy A1 which seeks to protect the amenity of communities and neighbours.

- 17.102 Those impacts are, however, considered acceptable in the round, given the context of the site, the development proposal, and the need to deliver housing and affordable housing.
- 17.103 Significant solar glare impacts are expected to impact road and rail users. However, this is assuming mirrored surfaces, and it is anticipated that further analysis and mitigation measures, if required, would resolve this matter. As such, this matter can be adequately resolved through condition and the solar glare impacts are thus considered acceptable.
- 17.104 The overshadowing impact is minor and does not require mitigation and overall is also considered acceptable.

***Outlook and privacy***

- 17.105 The development on Site A would be separated from any other building by at least 20 metres which would ensure a good standard of outlook and privacy is retained for all neighbouring properties. This separation distance is very good for an urban area and reflects existing separation distances that are apparent in the area including further to the south on Camley Street.

***Noise and disturbance***

- 17.106 With regards to potential operational noise impacts, the development design includes mechanical plant for ventilation and cooling measures, as well as emergency plant such as smoke extract fans, to be located on the rooftops and podiums. The proposed non-residential uses are expected to be reduced, in terms of their noise creating potential given the modern

construction and insulation of the buildings, to the existing vehicle workshops on site.

- 17.107 ES Chapter 9 (Noise and Vibration) assesses the existing noise and vibration environment and the predicted noise environment resulting from the proposals. Operational noise limits would be controlled to be in accordance with the policy requirements of the Local Plan. The proposals will be acceptable in this respect and will not materially impact on existing receptors, including the nearest residential neighbours and conditions will be secured to ensure appropriate noise controls are in place.
- 17.108 The Council's Environmental Health Officer has revised the noise information submitted with the application and raises no objections to the proposed noise levels. Hours of the non-residential uses on site would also be controlled by condition.
- 17.109 Similar noise limitations and controls will be in place for the development proposal on Site B and with either Site A on its own or both developments in place the noise environment will be suitable for neighbouring properties.
- 17.110 Equipment noise and vibration controls will be secured by condition.

***Artificial light***

- 17.111 The internal lighting from the new homes and makerspaces is not anticipated to be excessive and would not adversely affect neighbouring properties given the existence of diffuse lighting from homes and streetlights in the area already. Additional lighting from the development including security lighting and lighting to the public realm is expected to improve the safety of the public realm and will be designed not to impact negatively on private residencies.
- 17.112 The specific details of lighting and light spill in the area from the proposed development can adequately be secured by condition.

***Neighbouring amenity conclusion***

- 17.113 There will be significant impacts to some surrounding properties in terms of a loss of daylight and sunlight. It is acknowledged there are major impacts to some properties to the west of the site. In terms of Site A development there would be a major adverse day/sunlight impact to 4.5% of those properties surveyed (and no moderate adverse impact to any properties) and this increases to a 23% major/moderate adverse impact with both developments on Site A and Site B in place.
- 17.114 With respect to those affected properties referenced above, there is a conflict with CLP policy A1 insofar as it relates to protecting the amenity of those neighbours.

- 17.115 However, generally the retained levels of light are appropriate for the context of this Central London location and the requirement to optimise development on this underutilised site.
- 17.116 Outlook and privacy impacts are appropriate given the separation distances to neighbouring properties. Noise and light impacts are not expected to be significant and can be adequately managed through conditions.
- 17.117 Overall, the amenity impact on neighbouring properties is considered acceptable given the site context, significant need for new housing, the NPPF requirement to encourage a significant uplift in density of residential development on previously developed land. Whilst acknowledging a limited policy conflict in relation to light, the proposal overall accords with CLP policy A1, and complies with the development plan as a whole in terms of the impact on neighbouring amenity.

## **18. MICROCLIMATE**

- 18.1 CLP policy A1 acknowledges the impact that large developments can have on the local climate. CPG Amenity requires new developments to consider the local wind environment, local temperature, overshadowing and glare both on and off site.
- 18.2 Additional guidance from TfL's Healthy Streets for London recommends that streets should design in opportunities for sun, shade, and shelter from high winds to create places that can be enjoyed all year round.
- 18.3 CLP policy A2 recognises that the quality of open spaces is closely linked to the degree to which it is overshadowed and LP policy D9 says that daylight and sunlight conditions in the neighbourhood must be carefully considered when tall buildings are proposed.
- 18.4 The impact on microclimate is assessed in terms of the proposed development at Site A and also the cumulative impact of this alongside the proposed development at Site B.

### ***Overshadowing of public amenity areas***

- 18.5 The BRE's guidance set out in "Building Site layout planning for daylight and sunlight: a guide to good practice (BR 209 2022)" provides an industry standard framework for assessing and understanding light impacts of development. BRE guidance recommends that for amenity areas to appear adequately sunlit throughout the year, at least 50% of a garden or amenity area should receive at least two hours of sunlight on 21 March. DPR have assessed the quality of the public amenity areas in the Internal Daylight, Sunlight and Light Intrusion (IDSL) report submitted with the application.

- 18.6 The IDSL report identifies that the four amenity areas proposed across the two development proposals on Sites A and B satisfy the recommendations of the BRE guidance, and that 70% of the proposed amenity space area would receive two hours of sunlight on 21<sup>st</sup> March, which is a good level of sunlight access. The provision of sunlight for Site A on 21<sup>st</sup> March is shown below.

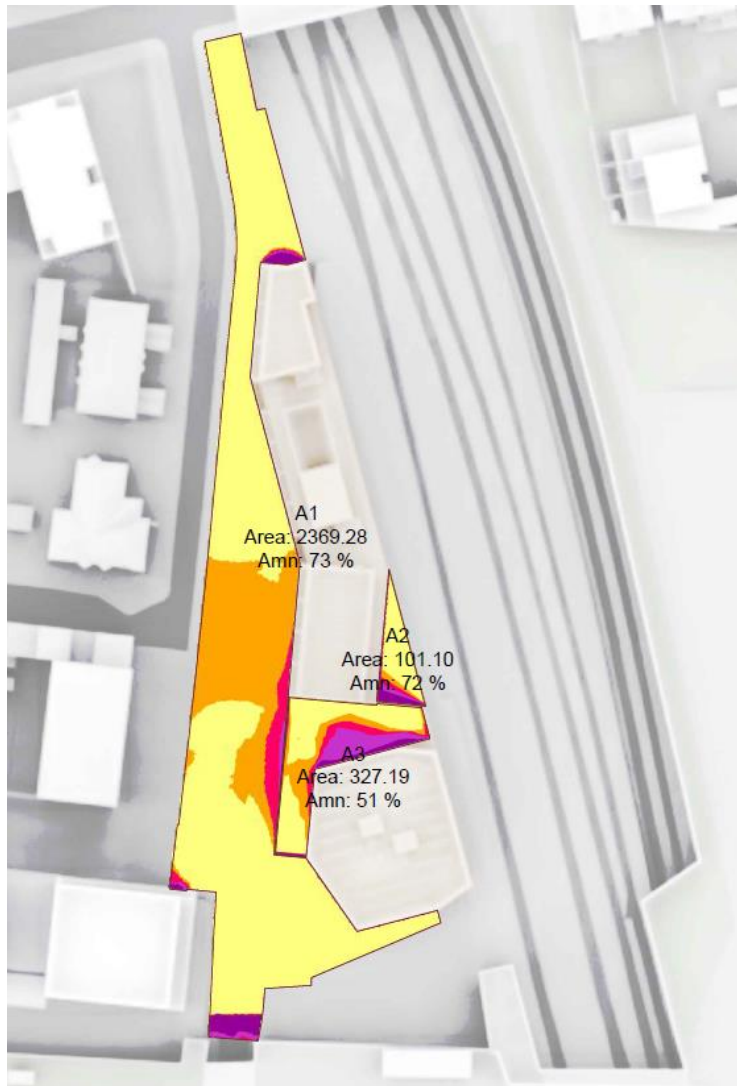


Figure 44 - Areas receiving at least two hours sunlight on 21 March (in yellow) for Site A.

- 18.7 The area marked as A1 above is the main public realm amenity area. The sunnier areas generally accord with spaces laid out for most intensive public activities, such as play space and yard space. The A2 space is a garden for the maker space. The site referenced as A3 is only accessible for maintenance and is therefore not a usable amenity area. However, it is also the least sunny space of the three identified above with 53% meeting the 2-hour sun on ground guideline. The other two spaces have 72-73% of their area meeting the guidance. Overall, the layout means the levels of sunlight on ground are good.








### ***Wind Microclimate***

- 18.8 Policy A1 of the Camden Local Plan 2017 acknowledges how large developments can alter the local climate as buildings can affect the flow of air causing wind tunnels. CPG Amenity provides further detail on design guidance for large buildings, and the assessment of their impact on local wind environments.

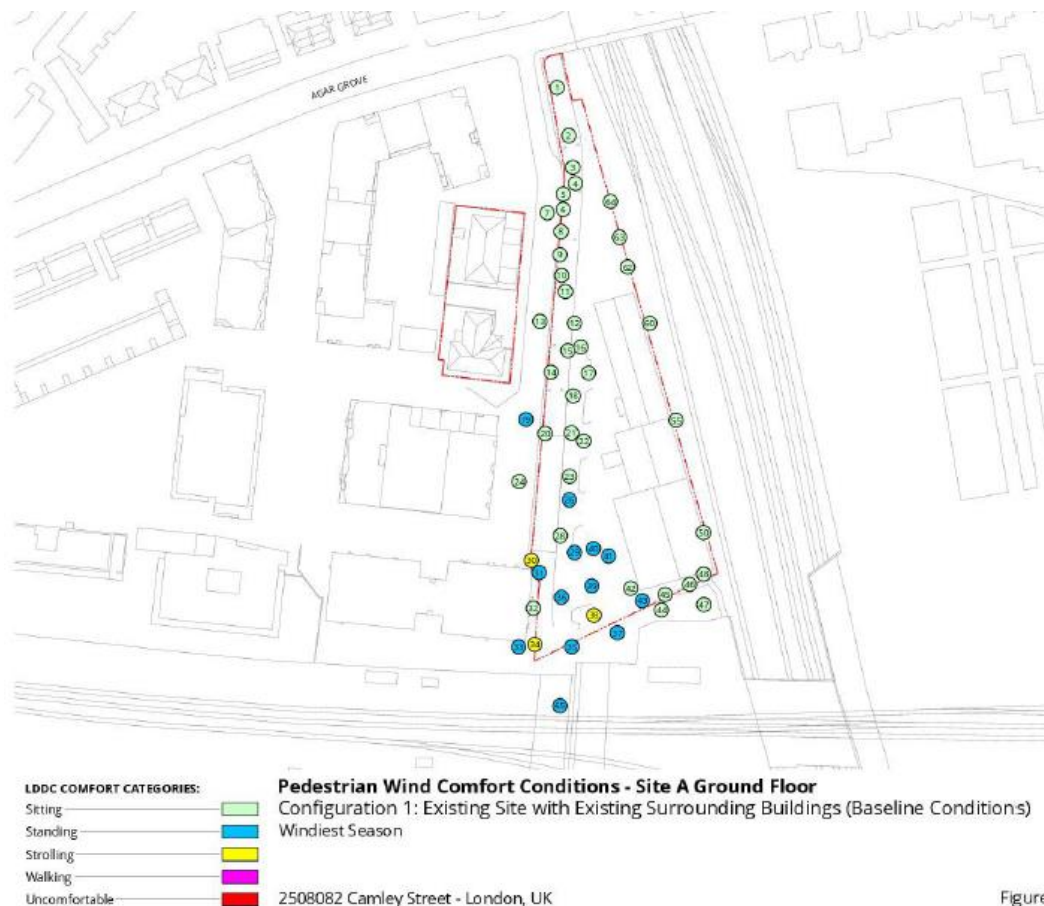
### **Methodology**

- 18.9 The wind microclimate assessment has considered the creation of undesirable wind speeds at ground level (specifically at building entrances, pedestrian thoroughfares, mixed amenity spaces and seating provisions) and at balcony amenity spaces within the sites and at ground level around buildings surrounding the sites, once the proposed development is completed. potential impacts on wind microclimate at and surrounding the Site were assessed based on the results of wind tunnel tests. Wind tunnel testing is the most well-established and robust means of assessing the pedestrian wind environment. Wind tunnel test results are fully quantitative and enable the pedestrian level wind microclimate at the Site to be quantified and classified in accordance with the Lawson Comfort Criteria.
- 18.10 The Lawson Criteria is the commonly used scale for assessing the suitability of wind conditions in terms of safety and comfort based upon threshold values of wind speed and frequency of occurrence. The safety criteria categorise areas as either safe or unsafe, whereas the comfort criteria set out a range of public activities, like sitting or strolling, and defines a corresponding comfortable wind speed and frequency of occurrence. If the proposed wind condition exceeds the threshold, then the conditions can be considered unacceptable for the activity. The criteria reflect that less active pursuits require less windy conditions. For example, strolling is less tolerant to stronger wind conditions than walking because people tend to have a more leisurely pace.

Key	Comfort Category	Threshold	Description
	Sitting	0-4 m/s	Light breezes desired for outdoor restaurants and seating areas where one can read a paper or comfortably sit for long periods
	Standing	4-6 m/s	Gentle breezes acceptable for main building entrances, pick-up/drop-off points and bus stops
	Strolling	6-8 m/s	Moderate breezes that would be appropriate for strolling along a city/town street, plaza or park
	Walking	8-10 m/s	Relatively high speeds that can be tolerated if one's objective is to walk, run or cycle without lingering
	Uncomfortable	>10 m/s	Winds of this magnitude are considered a nuisance for most activities, and wind mitigation is typically recommended

*Table 9 - Lawson Comfort Criteria (wind comfort levels)*

- 18.11 Chapter 10 of the Environmental Statement, along with the ES addendum, evaluates wind conditions on and around the site. The assessment compares current wind patterns to those after the proposed development is completed, factoring in all other planned developments within a 450-metre radius including the parallel application for development at Site B.
- 18.12 Analysis was conducted on a seasonal basis; however, the assessment focuses on the worst-case results, which typically occur during the windiest season in the winter (December, January and February), and those for the summer season (June, July and August) when the use of amenity spaces is usually most frequent. The results have been combined with long-term meteorological climate data for the London area (Heathrow and London City Airports).
- 18.13 The analysis was undertaken in the context of the existing buildings surrounding the site. Several configurations were assessed, including the existing site, Site A development in the existing context, Site B development in the existing context, development on both Site A and Site B together, and both sites with proposed landscaping and mitigation measures in place.



Figure

Figure 45 - Wind comfort levels for Site A (existing)

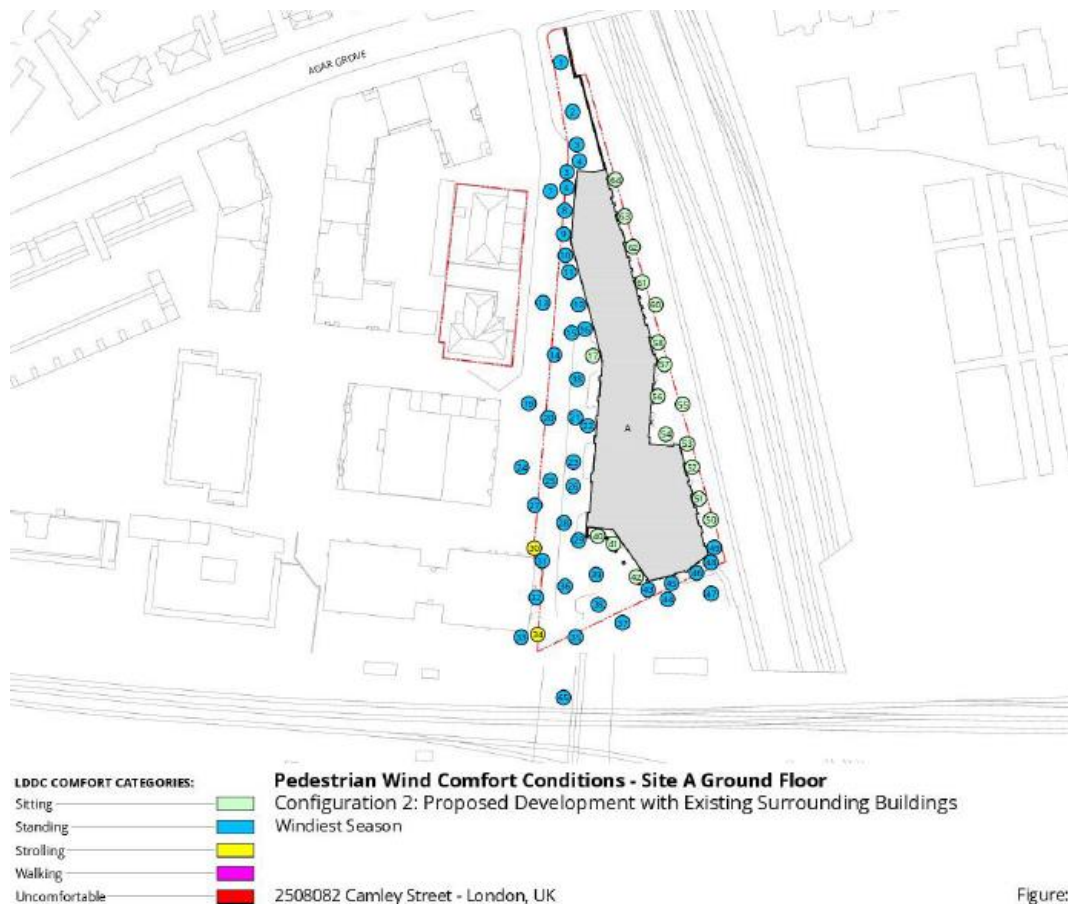
#### Baseline conditions

- 18.14 There are no areas where winds would exceed the 15m/s annual safety threshold at ground level.
- 18.15 During the windiest season, wind conditions on Site A and Site B and in the nearby surrounding area are a mixture of sitting and standing use, with localised strolling use wind conditions at the southern area of Site A only. During the summer season, wind conditions are generally calmer, which is due to the lower wind speeds and frequency associated with this period of the year, with a larger extent of areas with sitting use wind conditions.
- 18.16 There are no instances of strong winds exceeding the safety threshold as existing.

#### Proposed development – Site A

- 18.17 For proposed development on Site A with existing surrounding conditions, there would also be no strong winds created. Pedestrian comfort conditions on Site A and in the nearby surrounding area would generally be similar to the existing situation in both winter and summer.
- 18.18 Standing use wind conditions north of Building A1 (probe location 4), west of Building A2 (probe locations 15, 21, 23 and 26) and south-west of Building

A1 (probe location 39) would be one category windier than required and would represent a Minor Adverse (Significant) effect. Wind mitigation measures would be required to ensure conditions are suitable for the intended use. Details of these can be secured by condition. All other parts of the proposed development on Site A would be suitable for their intended end use, including residential balconies which are mostly suitable for sitting.



18.19

Figure:

*Figure 46 - Proposed winter comfort conditions at ground level for completed development on Site A (existing surrounding conditions)*

#### Proposed development – Site A and Site B together

- 18.20 Should the proposed developments on both Site A and Site B be completed there would be some strong winds occurring that exceed the 15m/s annual safety threshold at ground level. However, these would be to Site B only. Relevant mitigation measures will be secured through that separate planning permission, should it be granted.
- 18.21 For Site A, standing use wind conditions in the ground floor amenity areas north of Building A1 (probe location 4), west of Building A2 (probe locations 15, 21, 23 and 26) and south-west of Building A1 (probe location would be one category windier than required and would represent a Minor Adverse (Significant) effect.

- 18.22 For Site B, walking use wind conditions north of Building B1 (probe locations 137, 140 and 144) and at the south-eastern corner of Building B3 (probe location 113) would be one category windier than required and would represent a Minor Adverse (Significant) effect. Strolling use wind conditions at the southern, central entrance to Building B3 (probe location 124) would be one category windier than required and would also represent a Minor Adverse (Significant) effect. Standing use wind conditions in the Site B amenity seating area at the north-eastern corner of Building B2 (probe location 152) would be one category windier than required and would represent a Minor Adverse (Significant) effect. Standing use wind conditions at the Level 9 terrace of Building B3 (probe locations 221, 222, 223 and 225) would be one category windier than required and would represent a Minor Adverse (Significant) effect.
- 18.23 Details of appropriate mitigation measures to counter these effects can be secured by condition.
- 18.24 All other parts of the proposed development on Site A would be suitable for their intended end use, including residential balconies which are mostly suitable for sitting.
- 18.25 There would be one area on Site B with instances of strong winds exceeding the safety threshold north of Building B1 probe location 144 and would represent a Significant effect. Therefore, wind mitigation measures would be required to reduce the occurrence of strong winds. It is also noted that the area near the north-eastern corner of Building B1 (probe location 137) would marginally be below the safety threshold. Therefore, this area would also benefit from mitigation. Details of these measures can be secured by condition.

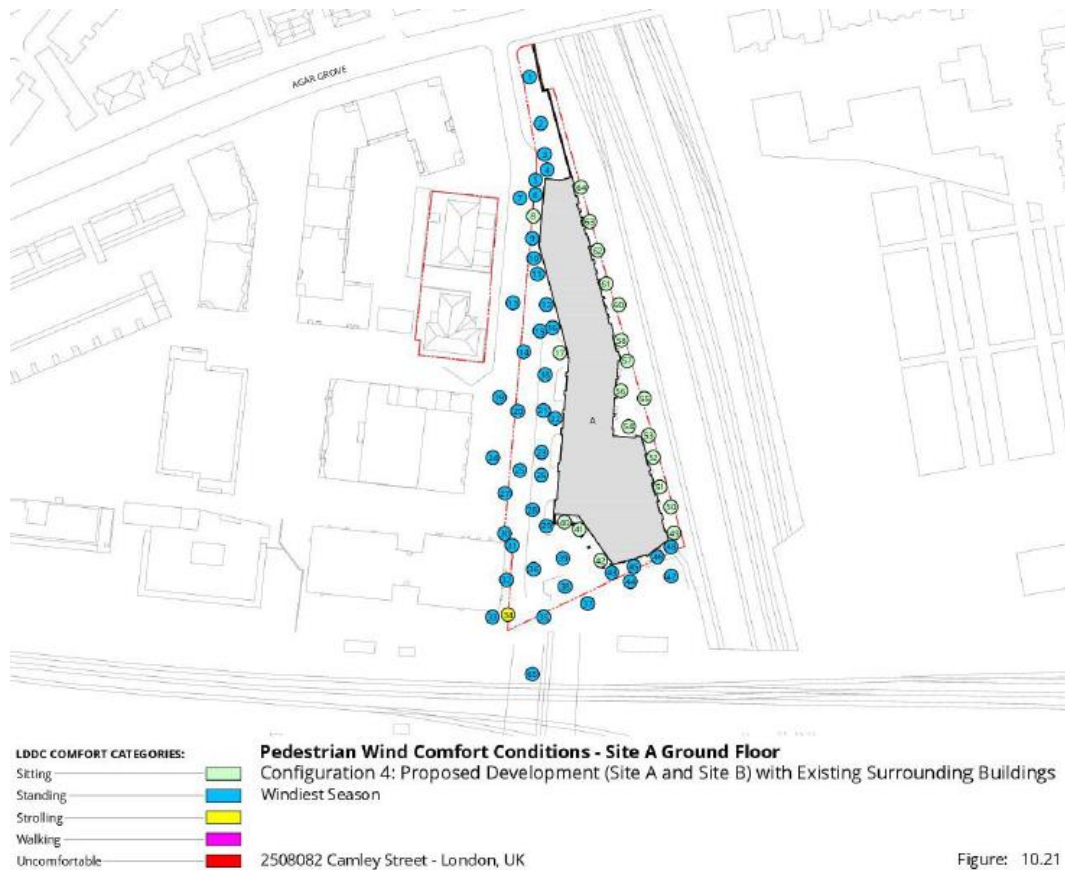


Figure: 10.21

Figure 47 - Wind comfort conditions for Site A with proposed developments on both Site A and Site B in place

### Mitigation summary for Site A

- 18.26 The sections above have considered the impact of the proposed development on Site A, and the combined development on Sites A and B, on Site A and the surrounding area. The adverse effects that require mitigation are described above. Mitigation measures for Site B will be secured through that planning application, should it be granted permission. Mitigation measures for Site A can be secured by condition for this application. There are no impacts on the surrounding environment that require mitigation as the result of the development on Site A or for both development proposals combined.
- 18.27 Mitigation measures are proposed for probe locations 4, 15, 21, 23, 26, and 39 in the form of tree planting and metal gates with semi-permeable finishes. Seating would be relocated from these areas where they are unsuitable for sitting and relocated elsewhere. As such, no fundamental design changes are required to the proposal as planting can adequately deal with areas of wind that could feel excessive.

### **Conclusion**

- 18.28 Overall, it is considered that the microclimate impacts relevant to proposed development on Site A are acceptable. There are no impacts outside of the site boundary, and the impacts within the site, where they occur, can be



managed and mitigated through careful public realm design and landscaping.

## **19. LANDSCAPE AND PUBLIC OPEN SPACE**

- 19.1 The development plan seeks to secure open space of high quality in new developments. LP policy G4 states development should create areas of publicly accessible open space, and LP policy D8 requires that appropriate management and maintenance arrangements are in place for the public realm, minimising rules governing the spaces in accordance with the [Public London Charter](#). LP Policy G4 states that new developments should provide public open space in areas of deficiencies. Developments for over 100 dwellings trigger the GLA play requirements under the London Plan. LP policy S4 requires 10sqm play space per child.
- 19.2 CLP policies A2 (Open space) and A3 (Biodiversity) and the Biodiversity CPG seek to protect, enhance and improve access to Camden's parks, open spaces and other green infrastructure. They also seek to protect existing trees, secure additional trees and vegetation and to protect and promote biodiversity.
- 19.3 The policies all strive for the provision of an engaging public realm for people of all ages, with opportunities for social activities, formal and informal play and social interaction.
- 19.4 London Plan Policy D8 (Public realm) is the key London Plan policy in this topic area. Policy D8 contains provisions relating to the design, function, operation and maintenance of proposed public realm within developments and the relationship between buildings and public realm; part A sets out that '...development proposals should encourage and explore opportunities to create new public realm where appropriate'.
- 19.5 London Plan Policy S4 (Play and informal recreation), part B 2) requires at least 10sqm play space per child, which should be (a) stimulating, (b) safe to access independently, (c) integral to the neighbourhood, (d) green, (e) overlooked and (f) should not be segregated by residential tenure. Developments should also (3) incorporate accessible routes to existing surrounding play provision and other infrastructure and (4) incorporate incidental play.
- 19.6 Supporting para. 5.4.4 notes that 'There should be appropriate provision for different age groups, including older children and teenagers'
- 19.7 Camden policy requires that 9sqm of Public Open Space is required per additional resident plus an additional 6.5sqm of play provision. Some of the Public Open Space can include play. Some of this could also be in

communal or private gardens where it is provision for 0-5s, but this 0-5 provision should not comprise more than 55% of the total play provision.

- If there is a shortfall in public open space on the site then a financial contribution will be required to address the shortfall, based on £200 per sqm of open space shortfall (capital)
- £7 per sqm of open space shortfall for 10 years (maintenance)

19.8 The Camley Street Neighbourhood Plan Policy CS GI2 (New Open Space Provision) states that 'development that increases the demand for recreation or amenity shall provide for new green/open space and play space and contribute to the green infrastructure network'. Specific reference is made to, under part b), linking to the proposed Camden Highline and, part (c), to the creation of a 'pocket park' with play provision, where possible, dedicated play provision.

19.9 The Canalside to Camley Street SPD sets out site specific guidance for sites G (120-136 Camley Street) and I (Cedar Way Industrial Estate and land to the south) and includes reference to:

- improved cycle link and new public realm as part of an enhanced entrance into Camley Street;
- new public realm space to improve the 'arrival experience' from under the bridge and connect access into Agar Grove Estate;
- reinforce and improve Camley Street as a strong green corridor... with substantially improved public realm;
- increased permeability through sites and the wider area;
- minimise access points with a service/vehicle access along east/railway edge of sites to form a commercial "service street" and rear access to ground floor uses; and
- provision of a chain of suitably sized and located green and urban spaces linked with potential new pedestrian routes.

### ***Introduction***

19.10 The existing site is predominantly covered by hardstanding and built form; however it does contain some existing trees.

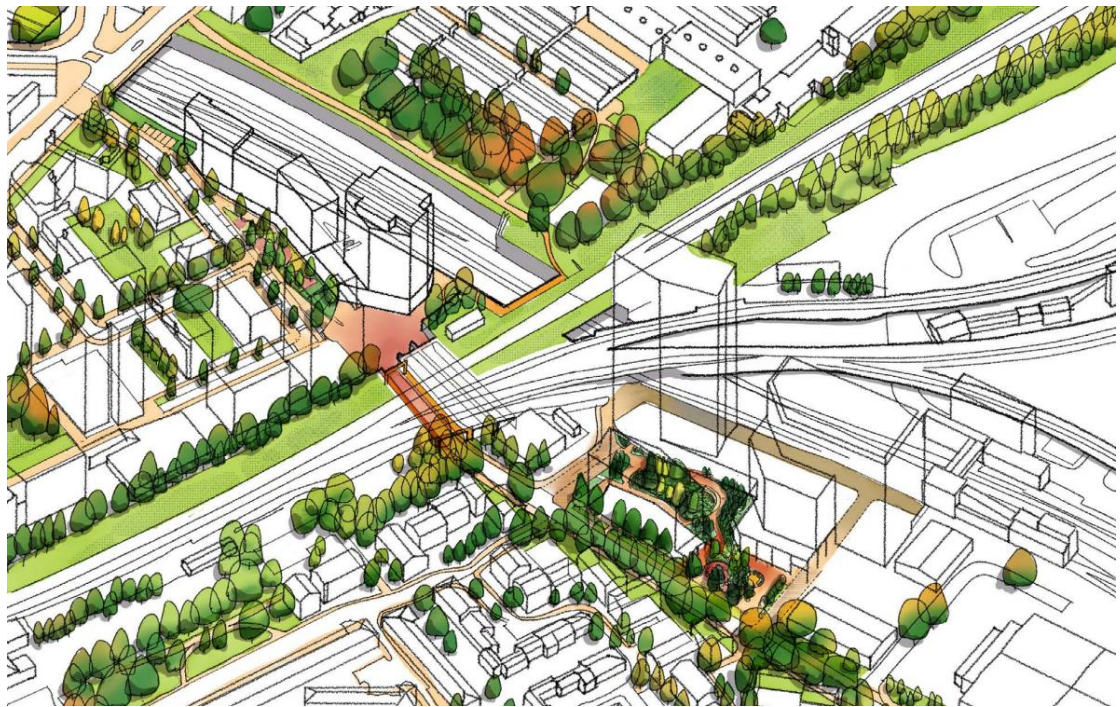
19.11 No part of the site includes any areas of land which are designated as Public Open Space or Sites of Importance for Nature Conservation (Local Plan policies map). The North London Line at York Way SINC is located to the east of the site, north and south of the east-west railway lines, but Site A is not directly adjacent to the SINC. The potential Camden Highline would run along the route of this SINC

19.12 The site is within the 280m buffer zone of nearby open space therefore in policy terms it is not identified as deficient in open space.

19.13 The surrounding area includes a range of different open space and play space (albeit some of these are on neighbouring residential estates), including:

- Maiden Lane Open Space and sports pitch c. 100m from Site A.
- Agar Grove Estate play space c.235m from Site A.
- Camden Square Gardens c.400m from the mid-point between the sites.
- St Pancras Gardens c.600m from the mid-point.
- Camley Street Natural Park c. 700m from the mid-point.

19.14 The Regent's Canal towpath is also an important part of the local public realm; it is located to the south-west of the site.



*Figure 48 - Illustrative plan showing Camley Street and Cedar Way landscaping proposals*

### **Public Open Space**

19.15 The proposed development for Site A includes landscaping proposals formed of three key interconnected public spaces:

- At the northern end, an arrival space towards the corner of Agar Grove and Wrotham Road (Upper Wrotham Road).
- A central area of public realm, comprising a seating grove and play garden.
- Camley Yard, at the site entrance from the south, which provides an open yard space with some planters and links to the pedestrian and cycle link to Wrotham Road.

- 19.16 In addition, an area known as Makers' Garden provides a dedicated space to the rear of the maker space but is not counted towards public open space calculations.

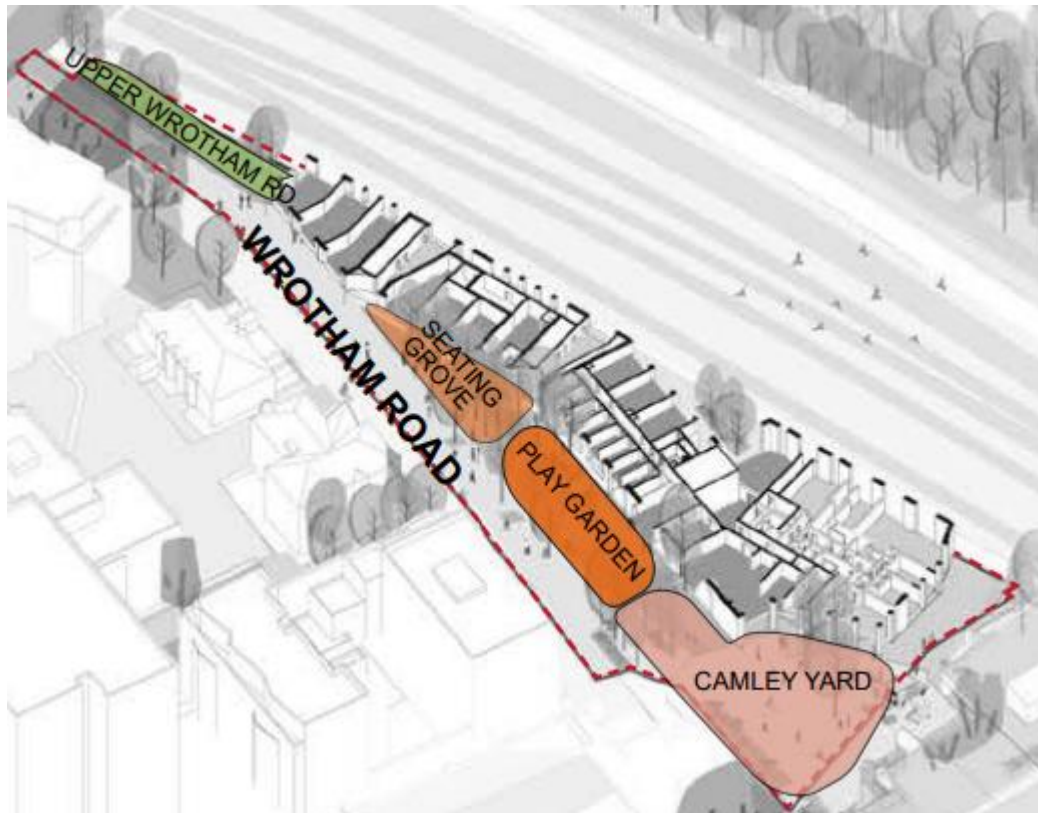


Figure 49 - Proposed open spaces on site

- 19.17 The landscape design includes extensive planting within these spaces and there will also be tree planting along Wrotham Road which is proposed to be widened under a separate application. There is some overlap with the application site boundary for the Agar Grove site and tree planting will be coordinated across both sites, with each delivering the planting on their side of the road.
- 19.18 Pedestrian and cycle access to the site is from Camley Street, via Camley Yard, and Wrotham Road, including via a shared and re-designed ramp.





*Figure 50 - Illustrative images of the Camley Yard open space*

- 19.19 Camley Yard is the primary open space at 780 sqm and is a mostly hard-surfaced space terminating Camley Street to the north, Camley Yard would be a pedestrian and cyclist movement node and 'front door' to the Makers Spaces and Block A3 homes.
- 19.20 The Play Garden (405 sqm) is a publicly accessible playspace for children, adjacent to Wrotham Road, which contributes to the wider play network of the Agar Grove Estate and beyond. Taking inspiration from the tradition of playgrounds in housing estates, this play area offers exciting and adventurous play for resident and local children.



*Figure 51 - Illustrative images of the Play Garden and Seating Grove*

- 19.21 A Seating Grove (165 sqm) is proposed next to the Play Garden, with a grove of trees with a ribbon bench wrapping around them to form a seating space on Wrotham Road, between the residential entrances to A1 and A2.
- 19.22 The Upper Wrotham Road space (165 sqm) forms the northern apex of the site and provides as an opportunity to create a biodiversity and habitat haven for wildlife, with integrated play on the way.
- 19.23 These spaces total 1,515 sqm. The Upper Wrotham Road POS will contain 6 parking spaces which will serve the Agar Road site; these will eventually be phased out as part of the agreed parking strategy for that scheme and this additional 80sqm will be incorporated into the open space, resulting in 1,595sqm total POS at this future stage. This space will require careful design to successfully incorporate the temporary parking spaces and deliver a functional and attractive space. The parking spaces will be formed using 'Grasscrete' so that they blend in and allow drainage



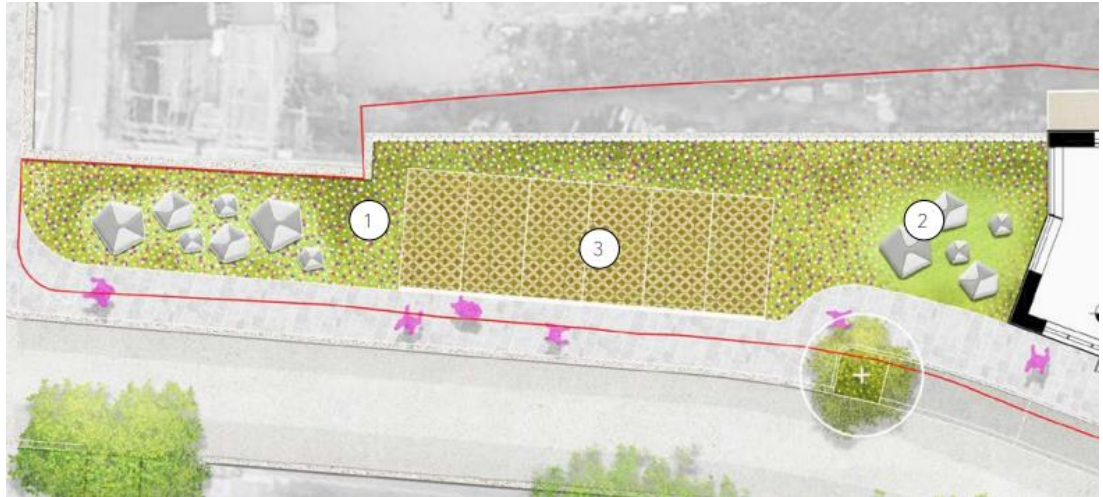


Figure 52 - The Upper Wrotham Road POS

19.24



Figure 53 - Biodiversity planting and 'play on the way' area within Upper Wrotham Road POS.

- 19.25 CLP Policy A2 (Open space) sets out the LPA's local quantitative standards: 9 sqm per occupant for residential schemes and 0.74 sqm for commercial schemes 'while taking into account any funding for open spaces through the Community Infrastructure Levy'; priority is given to on-site open space, with an allowance for off-site provision and a financial payment in lieu of full on-site provision at this quantum.
- 19.26 Policy results in a requirement of 2603sqm of public open space. The proposed development provides 1515sqm of public open space, to be increased to 1595sqm at a point in the future, therefore there is a considerable shortfall in terms of public open space provision on the site. The site is a constrained site which is intended to deliver significant mixed use development including c. 110 homes. It is considered that the proposed development has sought to balance delivering on the many competing objectives of policy and guidance and it would not be possible to deliver a

greater proportion of the site as public open space. The wider public realm proposals, such as the enhanced Wrotham Road corridor, together with the quality of spaces envisaged on site should also be taken into account. In view of the above it is considered appropriate in this instance to accept payment in lieu, based on the CPG, of £302,130 (plus indexation) to compensate for the deficit. This would be used for improving existing open spaces in the vicinity of the site, and which are accessible on foot and cycle.

- 19.27 Details of management and maintenance of the open space will be secured through planning obligations via the shadow s106 legal agreement and the detailed design and landscaping of the open spaces will be secured through conditions. Accordance with the Public London Charter would also be secured through planning obligation through the shadow s106 agreement.
- 19.28 Given the above, it is considered that the proposed Public Open Space provision is acceptable.

### ***Play Provision***

- 19.29 Provision for children's play space is made in the western part of the site, all areas being easily accessible from the new homes and also from Wrotham Road and the homes in Agar Grove beyond.



*Figure 54 - Proposed open space provision*

- 19.30 The play space proposed totals 454sqm. It is concentrated within the central part of the site, shown above, as Play Garden and Seating Area. This area makes provision for ages 0-4 and 5-11. The site makes no provision for the 12+ age group.
- 19.31 The 'Play Garden' is the key play area on site and is described by the applicant as an exciting and inclusive play space for local children and

families. As part of the Camley Street Spine, the Play Garden will give life, playfulness and activity to Wrotham Road from which it is accessed. As part of a wider network of play spaces including those proposed at the nearby Cedar Way redevelopment and the Agar Grove Estate, this playground caters for younger age groups, with some elements aimed towards older children for challenging and diverse play opportunities. Robust planting and trees are integrated throughout for shade, biodiversity and sensory play. The Play Garden is the main play provision for children within Site A, this is considered positive as it allows resident children from neighbouring communities to interact and socialise. There are various seating areas for parents and carers, and a low fence for child safety. The space is likely to be affected by wind, as explained in the Microclimate section of the report, so any seating in particular will need to be carefully sited and potentially screened by planting.





Figure 55 - Illustrative view of Play Garden



Figure 56 - A plan of the Play Garden



1. Sculptural play elements set within a planted playground
2. Landform play
3. Stacked climbing play
4. Play amphitheatre / stage

*Figure 57 - Elements within the Play Garden*

19.32 The total play space requirement for the Camley Street site is 966sqm, so at 454sqm less than 50% of the policy requirement is being delivered on site and a payment lieu of £302,130 (plus indexation) to fund improvements to local play space in the local area will be required, this will be secured by shadow S106 legal agreement. There are open spaces in the vicinity which could be improved with this funding including potentially Camden Square Gardens which the Council's Green Space Development Manager considers may have some potential for the inclusion of some informal play features.

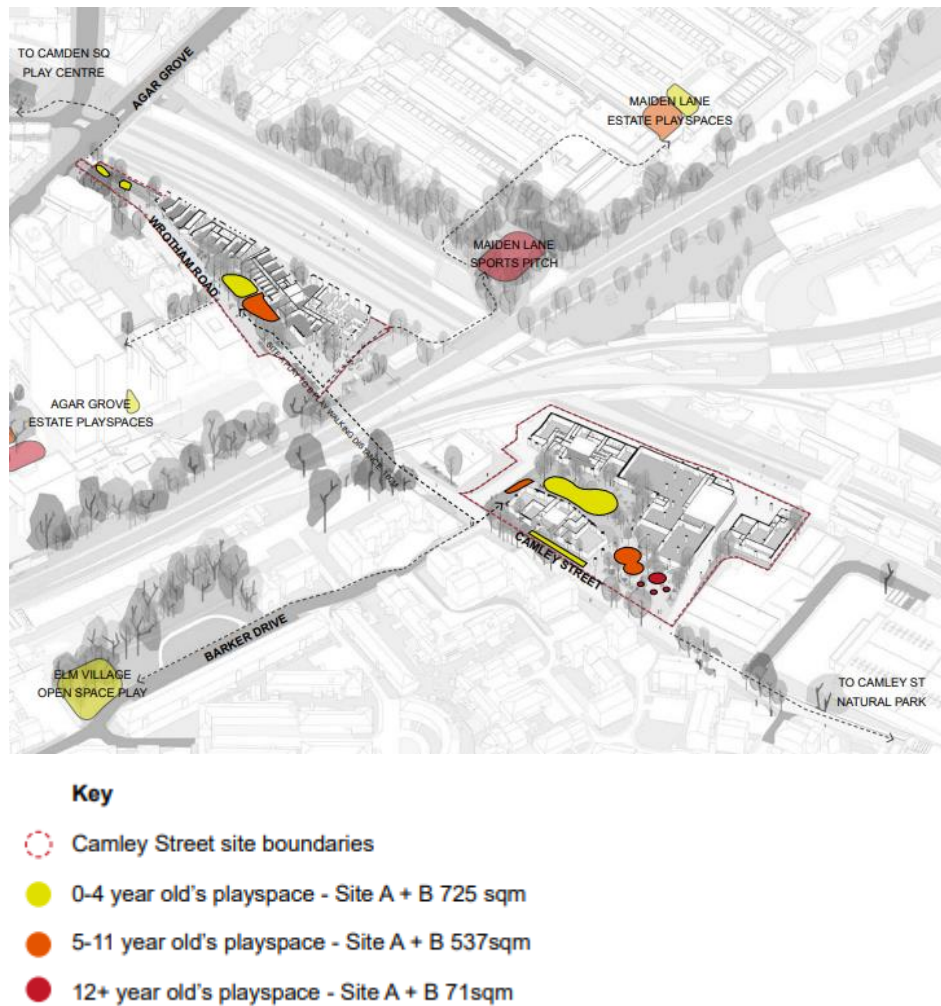


Figure 58 - Play strategy across the Camley Street and associated Cedar Way sites

- 19.33 It is also important to note that proposed development for Site B which is being considered under a parallel planning application includes overprovision of play space for all ages against policy, (albeit cumulatively across the two sites there remains a 13% under provision against policy). The play areas in Site B (if approved) will be within easy walking distance of the proposed homes on Site A offering them access to more play facilities and importantly it means the 12+ age group will have close access to suitable provision.



Play Space Target Age	Play Space (m <sup>2</sup> )		Difference
	Requirement	Provision	
Site A			
0-4	373m <sup>2</sup>	321m <sup>2</sup>	-52m <sup>2</sup>
5-11	314m <sup>2</sup>	133m <sup>2</sup>	-181m <sup>2</sup>
12+	279m <sup>2</sup>	0m <sup>2</sup>	-279m <sup>2</sup>
Total	966m <sup>2</sup>	454m <sup>2</sup>	-512m <sup>2</sup>
Site B			
0-4	290m <sup>2</sup>	404m <sup>2</sup>	+114m <sup>2</sup>
5-11	192m <sup>2</sup>	404m <sup>2</sup>	+212m <sup>2</sup>
12+	70m <sup>2</sup>	71m <sup>2</sup>	+1m <sup>2</sup>
Total	552m <sup>2</sup>	879m <sup>2</sup>	+327m <sup>2</sup>
Site A and Site B			
0-4	663m <sup>2</sup>	725m <sup>2</sup>	+62m <sup>2</sup>
5-11	506m <sup>2</sup>	537m <sup>2</sup>	+31m <sup>2</sup>
12+	349m <sup>2</sup>	71m <sup>2</sup>	-278m <sup>2</sup>
Total	1,518m <sup>2</sup>	1,333m <sup>2</sup>	-185m <sup>2</sup>

Table 10 - Masterplan play space provision by age groups, across Site A and B

As with the POS, the overall play provision ‘package’ including the more formal provision – which is considered to be very high quality - the incidental ‘play on the way’ areas and the complementary new play opportunities at the Cedar Way site, together with payments in lieu to improve other areas in the vicinity is considered acceptable.

## 20. TREES, GREENING, AND BIODIVERSITY

### *Impact on trees, greening and biodiversity*

- 20.1 Local Plan policy A3 deals with biodiversity and expects development to protect and enhance nature conservation and biodiversity, securing benefits and enhancements where possible. It resists the removal of trees and vegetation of significant value and expects developments to incorporate additional trees and vegetation. This approach is supported by LP policy G5 which uses Urban Greening Factor (UGF) targets to evaluate the quality and quantity of urban greening. The policy applies a target of 0.4 for mainly residential schemes, and 0.3 for mainly commercial schemes.
- 20.2 Policy G7 of the London Plan states that trees of value should be retained wherever possible and that adequate replacement trees should be provided

if tree removal is necessary. Policy A3 of the Local Plan states that replacement trees should be provided where the loss of significant trees occurs and that developments are expected to incorporate additional trees and vegetation wherever possible. CPG Trees seeks to preserve existing tree and canopy coverage.

20.3 The site contains only 5 individual trees at present and all 5 are proposed for removal, as follows:

- T49 – Category B2 (Ash)
- T50 – Category C2 (Sycamore)
- T48 – Category A2 (London Plane)
- T47 – Category A1 (London Plane)
- T46 – Category B2 (Locust Tree)

20.4 The standard classification for trees are as follows:

- Category A: trees of high quality with an estimated remaining life expectancy of at least 40 years.
- Category B: trees of moderate quality with an estimated remaining life expectancy of at least 20 years.
- Category C: trees of low quality with an estimated remaining life expectancy of at least 10 years, or young trees with a stem diameter below 150 mm.
- Category U: trees in such a condition that they cannot realistically be retained as living trees in the context of the current land use for longer than 10 years.

20.5 Two of the trees proposed for removal are mature category A London Plane trees. Due to building proximity and creation of hardstanding has proved impossible to retain them. These are prominently located and the Council's Trees and Landscaping Officer considers this to be harmful, however, taking account of the very significant need to deliver new homes and to optimise the development potential of the site, they conclude that the proposed replacement tree planting mitigates against the loss in terms of both canopy cover and public amenity. It is noted that 45 trees are proposed to be planted which is clearly a considerable increase in tree cover overall, which is expected for a site of this scale and type.



Figure 59 - A category B tree to be removed (T46 Robinia/Locust Tree). This is likely to have suffered compaction issues due to vehicular parking within its RPA



Figure 60 - Trees to be removed shown circled. Proposed trees shown in red

- 20.6 Details of species and sizes of trees to be planted will be secured through conditions and will be interrogated in detail at that stage by the Council's Tree Officers to ensure suitability for the site, context and local climate. All new trees to be maintained by the council should follow the advice in the Council's tree planting strategy with regard to species selection, size of nursery stock and post-planting maintenance. Three trees are proposed near the railway. Species selection here should avoid trees that will encroach upon the railway, to prevent expensive and disruptive track closures.
- 20.7 Policy G6 of the London Plan seeks a net gain in biodiversity on site, while policy A3 of the Local Plan states that developments will be assessed for their ability to realise biodiversity benefits. The site is not within a designated biodiversity zone such as a Site of Importance for Nature Conservation (SINC).

### ***Biodiversity***

- 20.8 The site is not identified in the Local Plan as deficient in access to nature. The baseline habitat value has been calculated as 0.48 Habitat Units. The baseline ecological assessment determined the existing site to be of generally low ecological value, with developed land dominating and vegetated habitats comprising small areas of mixed scrub, modified grassland, and individual trees only.
- 20.9 An Ecological Impact Assessment (EcIA) which indicates that:
- the site is unlikely to support protected or notable species;
  - it has low ecological value;
  - most of the habitats in the surrounding area, with the exception of the rail corridor, are also of low ecological value;
  - the rail corridor is a borough level Site of Importance for Nature Conservation; this, combined with a relatively large number of mature and semi-mature trees in the residential areas to the west, provides habitat for a range of common birds and invertebrates, and a foraging area for common species of bat.
- 20.10 The proposed development includes ecological enhancements which will be provided through:
- landscaping that strengthens the east-west ecological corridor provided by the London Overground rail line and mature trees north of Elm Village, including Elm Village Open Space.
  - remodelling Camley Street itself to enable the existing canopy of mature trees (south of the London Overground rail corridor) to be augmented by additional planting and continuing this theme north of the London

Overground by reconfiguring the pedestrian/cycle route to allow for a green link through to Agar Grove.

- installation of biodiverse green roofs to complement biodiverse green roofs already installed on new developments at Kings Cross and at the intersection between Camley Street and the Regent's Canal.
- Pollinator friendly planting.

- 20.11 The landscape strategy embeds biodiversity into all levels of the site, from the public realm to terraces and roofs. A diverse planting palette supports ecological value while reinforcing the site's green identity. Measures include native trees, pollinator-friendly species, bird and bat boxes, insect hotels, and green roofs with habitat features such as log piles and bee bricks. Planting is designed to enhance ecological connectivity, particularly for birds, bats, and invertebrates, aligning with biodiversity net gain principles
- 20.12 On completion of these measures, it is anticipated that the proposed development would have a positive impact on local biodiversity. The Council's Nature Conservation Officer has reviewed the proposals and agrees with this conclusion and he confirms that the proposals will easily achieve BNG requirements due to the low baseline ecology. It will be important to maximise the potential through careful planting design including that of the landscaping and biodiverse roofs, and opportunities for bird and bat boxes should be increased; all of which can be captured via planning conditions.
- 20.13 The London Plan uses the Urban Greening Factor scores to help objectively evaluate the quality and quantity of urban greening. London Plan Policy G5 sets a target of 0.4 for predominately residential and 0.3 for predominately commercial developments. This scheme achieves 0.35 which, given its mixed nature, is acceptable. This will be secured as a minimum requirement by condition but with an aspiration to meet 0.4. The proposals include a range of greening measures such as intensive green roofs (1075sqm) with 150mm substrate and flower-rich perennial planting covering 425sqm. Permeable paving covers 381sqm. A planning condition is proposed to seek an increase in UGF.
- 20.14 Given the above, the proposals are considered acceptable in nature conservation, landscape and biodiversity terms in line with the development plan.

### ***Statutory Biodiversity Net Gain***

- 20.15 As well as the requirements of the development plan, there are statutory requirements for 10% Biodiversity Net Gain (BNG).
- 20.16 BNG is a way of creating and improving natural habitats with a measurably positive impact ('net gain') on biodiversity, compared to what was there before development. Every grant of planning permission is deemed to have

been granted subject to conditions which require the submission of a Biodiversity Net Gain Plan (BGP) and appropriate monitoring measures before development can commence, showing how the 10% gain will be met.

- 20.17 In this particular case the improvement to biodiversity will be considerable. The proposals will deliver a significant increase in biodiversity, in terms of habitat units, and will comply with and exceed the statutory minimum 10% requirement. The site has an existing baseline of 0.48 habitat units, a proposed uplift to 2.43 habitat units, which results in a 409.7% uplift.

## **21. TRANSPORT**

### ***Policy context***

- 21.1 The Mayor's Transport Strategy 2018 (MTS) sets a target for 80% of all Londoners' trips to be made by foot, cycle, or public transport by 2041. The MTS and the London Plan require new developments to promote sustainable transport, reduce congestion, improve air quality, and restrict car parking, especially in areas with good public transport access.
- 21.2 Policy T1 of the London Plan and Local Plan prioritise walking, cycling, and public transport, while Policy T2 mandates car-free developments. Policy T3 and T4 address infrastructure improvements and the sustainable movement of goods and materials.
- 21.3 In The draft CLP site allocation S5 (120-136 Camley Street) and Policy S1 (Central Camden) commit to new pedestrian and cycle routes and public realm improvements, supporting the Council's Transport Strategy and Cycling Action Plan. Camden's Transport Strategy (CTS) 2025–2028, Clean Air Action Plan, and Climate Action Plan further reinforce these objectives.

### ***Site context***

- 21.4 The site is in the Camden Square ward and is sited east of Camden Town. It is bounded by Agar Grove to the north and railway lines to the east and south. To the west is the Agar Grove Estate. Public Transport Accessibility Level (PTAL) rating is a maximum of 3 (moderate), but it is generally well connected to public transport via its proximity to Kings Cross, St. Pancras, Camden Town and Mornington Crescent stations' underground and national/international rail links. Camden Road London Overground station is also close to the site. The nearest bus stops are immediately north of the site on Agar Grove.
- 21.5 There are Santander cycle hire docks on Agar Grove and Camley Street. Parking pays for dockless bikes are available on St. Augustine's Road to the north and Camley Street to the south of the site. These bays are already showing signs of overcapacity and increasing demand.



- 21.6 Camden's Transport Strategy department has commissioned a project to identify Shared Transport Availability Level (STAL) which mirrors a PTAL rating, but in this case only including shared and micromobility transport modes: Car Clubs, Santander hire bikes, and rental E-scooters and E-bikes. The STAL analysis shows grades of 1A and 3 in the vicinity of the site, which indicates significant opportunities for improvement, considering it is our aspiration (and target) for the STAL score to be 5. The Council has plans to expand the network of dockless rental e-bikes and rental e-scooter bays in the area

***Development context***

- 21.7 This detailed planning application is for Full Planning Permission and relates to a single plot of development (Site A). The application is therefore being considered on its own merits. However, it has been submitted alongside a concurrent application at 3-30 Cedar Way (application ref. 2025/4364/P – known as Site B) which is located to the south of this site across the railway lines.
- 21.8 The proximity of the sites means there are elements of the development proposals which relate to one another from a transport and public realm perspective. The planning policy context supports this approach as demonstrated by the Camley Street Neighbourhood Plan, the Canalside to Camley Street SPD and the emerging draft Local Plan, which identify both sites as being suitable for new development and support an approach which secures comprehensive development over multiple sites.
- 21.9 It is acknowledged by the Council that these applications are interconnected, though each application is not reliant on the other coming forward for development. This development proposal has been assessed on this basis.

***Assessment***

Trip generation and travel planning

- 21.10 The TRICS database was used to derive the anticipated total person trip rates for the proposed development. The net change in multi-modal trips would be an increase in 162 trips (which includes a reduction in vehicle trips of 318) with most of these being pedestrian, public transport and cycling movements.
- 21.11 The proposed development will result in a significant increase in person trips. Based on other similar developments in the area, it is anticipated that a high volume of the walking trips is likely to be made from Camden Town, Mornington Crescent and King's Cross St Pancras Underground stations, Camden Road Overground station, the nearby bus stops, and commercial, entertainment, shopping, and restaurant venues in the Camden Town area.

21.12 Considering the increase in active travel to and from the site, a financial contribution towards the aforementioned CTS committed schemes has been requested. An Active Travel Zone (ATZ) assessment included in the TA focuses on seven routes to key destinations. The analysis demonstrates there are opportunities for enhancements to the walking and cycling environment, especially improving the lighting under the railway bridge, and increasing the width of the footway. The railway arch and the land beneath it are in Network Rail ownership and improvements to this environment cannot be guaranteed. As such, a feasibility study to improve access though, security and conditions for this route will be secured instead. Financial contributions to improve the public realm environment, and feasibility studies to improve the conditions under the railway viaduct, can be secured through **shadow s106 legal agreement**.

21.13 A Framework Travel Plan was submitted in support of the planning application, which demonstrates a commitment to encouraging and promoting trips by sustainable modes of transport. Modal share projections should be set for both walking and cycling in accordance with Camden's Transport Strategy and the Mayor's Transport Strategy. A Travel Plan will achieve this and this document plus an associated monitoring and measures contribution of £11,348 will be secured by **shadow s106 legal agreement**.

Car parking and vehicle access

21.14 The site is in controlled parking zone CA-N Camden Square, with controlled hours 08:30-18:30 Monday to Friday. The development will be car free **secured by shadow s106 legal agreement**, restricting both residential and business permits in accordance with CLP policy T2.

21.15 Five accessible parking bays will be provided for residents on Wrotham Road. The amount of parking proposed is in line with the London Plan policy and they can be easily accessed from the site (which is less than 50m away). The accessible bays will be outside the red line of the application, albeit on land under the Council's ownership. In order to accommodate the bays, amendments will need to be made to the layout and landscaping of Wrotham Road. Indicative proposals have been shared with officers but would require formal approval. The provision of the accessible parking bays shall be **secured by shadow S106 legal agreement** the obligation shall require relevant consents to be secured for the provision of these bays on Wrotham Road (or if necessary, an alternative location) and for the bays to be delivered prior to first occupation of the development.

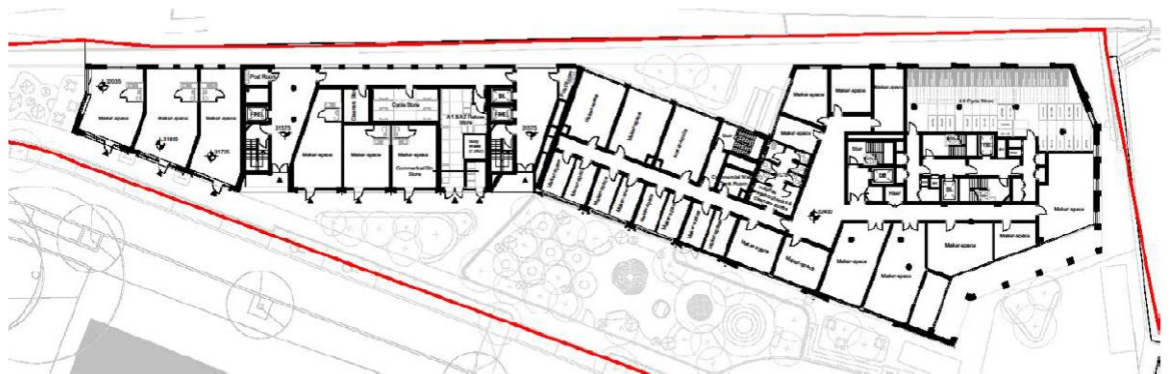
21.16 Officers expect most occupiers, users, employees and visitors to travel to the site by sustainable modes of transport. However, there is potential for some visitors with electric vehicles to drive to the site with a view to parking in an 'Electric Vehicles Only' parking bay in the controlled parking zone. The uptake of electric vehicles is increasing significantly, and there are many EV

resident permit holders in the vicinity of the site. This would put pressure on infrastructure which has been provided primarily for local stakeholders. An additional electric vehicle charging point (fast charger) should be provided on the public highway in the general vicinity of the site. A financial contribution of £20,000 will be secured for this by **shadow 106 legal agreement** in accordance with Local Plan Policy A1.

- 21.17 At present, the CA-N CPZ control hours do not extend into the evening nor cover the weekend, which presents an opportunity for visitors to drive to the site and park on street outside of hours of control, or indeed within hours, using paid for parking/visitor vouchers. This has a potential to increase on-street parking pressure which may drive demand for CPZ reviews. Considering the scale and the location of the proposed development, a contribution of £15,000 shall be secured through **shadow s106 legal agreement** towards a review of the CA-N CPZ, which is likely to take place in 2026/27 or 2027/28.

#### Cycle parking

- 21.18 The Council requires high quality cycle parking to be provided in accordance with Local Plan Policy T1, CPG Transport, the London Cycling Design Standards (LCDS), and London Plan Policy T5.
- 21.19 236 long-stay cycle parking spaces will be provided across the site in secure, covered, step free and lockable cycle stores on lower ground level accessed along the eastern extent, and on the upper ground level on the western side. Seven visitor cycle parking spaces will be provided in the form of Sheffield stands throughout the public realm.



*Figure 61 - Cycle parking at for residential use (top right and middle left)*

- 21.20 Cycle stores for larger cycles and workspace cycles would be provided at ground level.
- 21.21 The level and mix of cycle parking provision are in compliance with the London Plan standards and CPG Transport. Full details of cycle parking will be secured by condition 19.



Figure 62 - Cycle parking at for larger bikes and workspace (centre top and centre bottom)

### Servicing and deliveries

- 21.22 A draft Delivery and Servicing Plan (DSP) was provided with the application. The proposed development is expected to generate demand for 25 daily servicing vehicles. These will be able to use a dedicated on-street loading bay along Wrotham Road for the upper ground level, and off-street loading area within a dedicated yard space accessed from Camley Street for the lower ground level. Vehicles will be directed to the closest or most appropriate loading area for the relevant part of the site. The swept paths arrangements are considered acceptable by the Transport Officer.

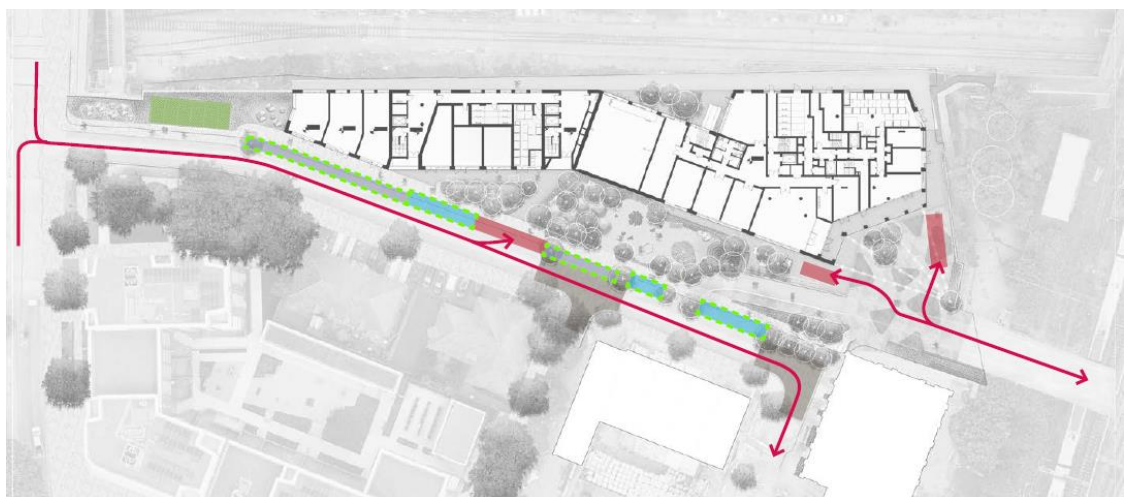


Figure 63 - Loading bays and access routes for the development at Site A.

- 21.23 A detailed Delivery and Servicing Management Plan (DSMP) will be secured by **shadow s106 legal agreement.**

### Construction Management

- 21.24 A Construction Environmental Management Plan was submitted with the application. Traffic congestion is a significant problem in this part of the borough, particularly during peak periods. The Council's primary concern is public safety, but construction traffic should also not create (or add to existing) traffic congestion in the local area. The proposal could also create a variety of amenity concerns for local people relating to noise, vibration, air quality, temporary loss of parking, etc. The Council needs to ensure that the development can be implemented without being detrimental to amenity or the safe and efficient operation of the highway network in the local area. A CMP document will also therefore be secured by **shadow s106 legal agreement** in accordance with Local Plan Policy A1. This document will need to take into account potential cumulative impacts from the potential future development at Site B also.
- 21.25 The Council will expect construction vehicle movements to and from the site to be scheduled to avoid peak periods to minimise the impacts of construction on the transport network. The contractor will need to register the works with the Considerate Constructors' Scheme. The contractor will also need to adhere to the CLOCS standard for Construction Logistics and Community Safety.
- 21.26 The development will require input from officers at demolition and construction stage. This will relate to the development and assessment of the CMP as well as ongoing monitoring and enforcement of the DMP and CMP during demolition and construction. An implementation support contribution of £30,513 and impact bond of £32,000 for the demolition and construction phases of the development works will be secured by **shadow s106 legal agreement** in accordance with Local Plan Policy A1.
- 21.27 A further requirement to form a construction working group consisting of representatives from the local community prior to commencement of demolition or construction will also be secured by **shadow s106 legal agreement**.

### Highway works

- 21.28 Where construction works might result in damage to public highway a financial contribution is required. A highways contribution (amount TBC) will be secured by **shadow s106 legal agreement**.

### Micro/shared mobility

- 21.29 Parking bays for dockless rental e-bikes and rental e-scooters, car club bays, and electric vehicle bays are located in the area. However, these merely provide capacity for existing usage by residents and people who work in or visit the area. Additional demand from this development is expected as an

alternative to public transport, especially when the primary mode of transport is rail with a secondary trip by micromobility vehicles.

- 21.30 A micro and shared mobility improvements contribution of £10,000 would therefore be secured by **shadow s106 legal agreement**. This would allow the Council to provide additional capacity for the parking of dockless rental e-bikes and rental e-scooters in the local area (e.g., by expanding existing bays and providing additional bays).

Pedestrian, cycling and environmental improvements

- 21.31 Pedestrian, cycle, and motor vehicle access will be provided in accordance with existing arrangements from Camley Street to the south, along with a new northern link via Wrotham Road connecting to Agar Grove. A new and enhanced public realm will prioritise pedestrians and cyclists, with the existing shared footway and cycleway connecting Camley Street to Agar Grove redesigned to improve safety and connectivity.
- 21.32 The development will place pressure on the existing infrastructure and services and will benefit directly from new and improved safe and healthy street schemes. The delivery of Camden's Safe & Healthy Streets schemes is based on the ambitious Camden Transport Strategy Delivery Plan for 2025-2028, in which developer contributions have been identified as a source of funding.
- 21.33 In line with the increase in walking and cycle trips generated by the proposed development and general increased pressure on the public realm in the local area a Pedestrian, Cycling, and Environmental (PCE) contribution would be secured by **shadow s106 legal agreement** (final amount TBC).
- 21.34 Transport for London were also consulted on this application and recommend highway and lighting improvements identified through their Active Travel Zone assessment. The contribution can help with improving the local highway environment, whilst lighting improvements can be secured by condition.
- 21.35 TfL also request enhancements to the underpass below the railway viaduct that is located between Sites A and B. This is Network Rail land and infrastructure and as such it is not guaranteed that permission will be granted by them for improvement works to the underpass. Nevertheless, investigations must occur into what improvements can be secured to the underpass and these investigations can be secured by **shadow s106 legal agreement**.
- 21.36 TfL request improvements to wayfinding and lighting to the overpass to the Maiden Lane Estate and this can be secured by condition, which also meets an objective of the draft site allocation S5 (condition 59). TfL also request to



be consulted on the final design of the cycle/pedestrian route that runs through Site A and this can be secured by **shadow s106 legal agreement**.

21.37 The Canal and River Trust expects increased pressure on the pedestrian/cycle paths along the canal as the result of this development proposal. A contribution will be secured to mitigate for this pressure and facilitate relevant improvements, secured by **shadow s106 legal agreement**.

21.38 The PCE contribution would go towards the following initiatives in the local area, as well as the ATZ improvements identified above:

- York Way/Agar Grove innovative "CYCLOPS" junction arrangement less than 500m north-east of the site, providing a critical gateway to/from the site for journeys by foot and bicycle;
- East-west cycle corridors linking multiple trip attractors through Camden Town, which are part of Cross-Camden Cycleway strategic cycle corridor schemes, and include Agar Grove and St Pancras Way just to the west of the site;
- Better Bus Partnership, specifically the upgrade of the bus stops/shelters on Agar Grove, immediately to the north of the site, including real-time bus information;
- Camley Street and Granary Street Safe & Healthy Streets Scheme measures north of Regent's Canal. This includes enhancements to the pedestrian and cycling environment underneath the railway bridge directly south of the site and a series of pedestrian/accessibility improvements along the length of Camley Street leading to/from the site from the south

#### Railway network

21.39 Transport for London are content with the proposals on Site A, subject to conditions and planning obligations, as described above. Network Rail were also consulted as they are the freeholder of land surrounding the development including operational railway lines to the east and south of Site A, as well as maintenance and freight facilities.



*Figure 64 – Network Rail land ownership shown in green*

- 21.40 Network Rail have objected to the proposals on grounds of the perceived impact from new residential accommodation in the area on freight infrastructure including related rail routes which they believe could put pressure on the safeguarded freight operations at the Kings Cross Freight Site to the south-east of Site A to reduce or cease their operations. This objection is discussed in the Agent of Change part of the ‘Residential quality’ section of this report above. Transport matters are discussed below.
- 21.41 Network Rail have also raised concerns that the underpass to the south of Site A would be used by an increased amount of pedestrian and cycle traffic. While this would be the case, this would be countered by the substantial reduction in vehicle traffic that would occur as the result of the existing vehicle workshop uses (and associated vehicle storage and ad hoc on-street parking) being removed from the site for which the underpass is currently the only point of access.
- 21.42 It is considered that the intensity of the usage of the underpass would not be significantly increased to the detriment of any Network Rail infrastructure. It is also relevant to note that the underpass is currently the only point of access to Site A for vehicles and this situation would not change, and there is a longstanding lawful access under the viaduct via this route for the public. As such, it is considered that an objection to the principle of the use of this underpass for access to Site A for the development proposal cannot be reasonably upheld.
- 21.43 Network Rail’s comments suggest they are open to discussions regarding the use of other arches within the viaduct which would allow pedestrians and cycles a separate route through it to the existing underpass. This is

welcomed and would improve connectivity between Site A and Site B to the benefit of both developments. Discussions can be secured through **shadow s106 legal agreement** alongside the underpass improvement discussions secured above.

21.44 Network Rail have also suggested planning conditions that are necessary to secure the safety and integrity of the operational railway infrastructure that is adjacent to the site. These relate to construction methodology, signal sighting and boundary fencing. Such conditions will be secured if planning permission is granted. An informative is also recommended that requests ongoing consultation with NR's asset protection team, which can also be added to any final planning decision.

21.45 As such, it is considered that the proposed development's impact on rail infrastructure is acceptable.

### **Conclusion**

21.46 The proposed development is acceptable and complies with the development plan in terms of transport implications subject to the conditions and obligations set out above.

## **22. SAFETY AND SECURITY**

22.1 Camden Local Plan (CLP) policy C5 requires that development incorporate design principles which contribute to community safety and security. London Plan (LP) policy D8 requires public realm to be well-designed, safe, accessible and inclusive. LP policy D6 deals with housing quality and the supporting text explains that gated forms of development that could realistically be provided as a public street are unacceptable, and alternative means of security should be achieved through the principles of good urban design and inclusive design. LP policy D11 requires schemes to work with Designing Out Crime Officers (DOCOs) to design and maintain a safe and secure environment that reduces fear of crime.

22.2 The applicant has engaged with the Designing Out Crime Officer prior to submission and incorporated their feedback. The development will incorporate a series of safety measures which will include ensuring that public spaces are well lit, with good visibility to encourage natural surveillance from the proposed uses and reduce anti-social behaviour. The proposed development will improve permeability of the site with stronger north-south and east-west connections encouraging more people to walk and cycle through the site. The new 119 homes will bring activation to the street making it feel safer and reducing the potential for crime. Improvements to the underpass will be investigated through an **Underpass Feasibility Study secured through shadow section 106 agreement**. New lighting and

active frontages would be provided. This will help create a safer and more inclusive environment.

- 22.3 Space to the rear of the site will be gated with access only for residents and commercial tenants as appropriate, ensuring a safe environment without restricting public access to meaningful links and routes.
- 22.4 The Council's Designing Out Crime Officer has reviewed the submission and requested that the site achieve a Secured by Design accreditation to silver award and that this standard is maintained throughout the life of the development (secured by condition 6).
- 22.5 As such, the development would result in a safe and inclusive environment in compliance with the development plan.

## **23. FIRE SAFETY**

### ***Policy context***

- 23.1 LP policy D12 requires the application to be accompanied by a fire statement, prepared by a suitably qualified third-party assessor. It also says development should achieve the highest standards of fire safety. LP policy D5 seeks to ensure that developments incorporate safe and dignified emergency evacuation for all building users. Further draft guidance is provided in the Mayor's [Draft Fire Safety LPG](#).
- 23.2 The current fire safety regulatory framework includes three gateways for "relevant buildings". A relevant building is a building 18 metres or more in height OR 7 or more storeys tall, containing two or more dwellings or student accommodation. This applies to new buildings as well as change of use of existing relevant buildings.
- 23.3 Planning Gateway One addresses fire safety considerations for relevant buildings in terms of land use planning, with the Building Safety Regulator (BSR) which is part of the Health and Safety Executive (HSE) acting as the statutory consultee. Gateways Two and Three, introduced by the Building Safety Act 2022, ensure thorough scrutiny of detailed information by the BSR, including building regulations compliance, prior to construction and upon completion.
- 23.4 The application site (Site A) contains relevant buildings, and therefore a Planning Gateway One Fire Statement and a London Plan Fire Statement have been submitted. The submitted Fire Statements were produced by OFR Consultants who are qualified third party assessors. These set out how the design will address the relevant policies in the London Plan and fire safety at Gateway One.

### **Fire Safety strategy**

- 23.5 The three blocks (A1, A2 and A3) range from 31m to 47m in height, making all blocks “relevant buildings” under Planning Gateway One. While all blocks sit on a shared podium, Block A3 is structurally separated from blocks A1 and A2.

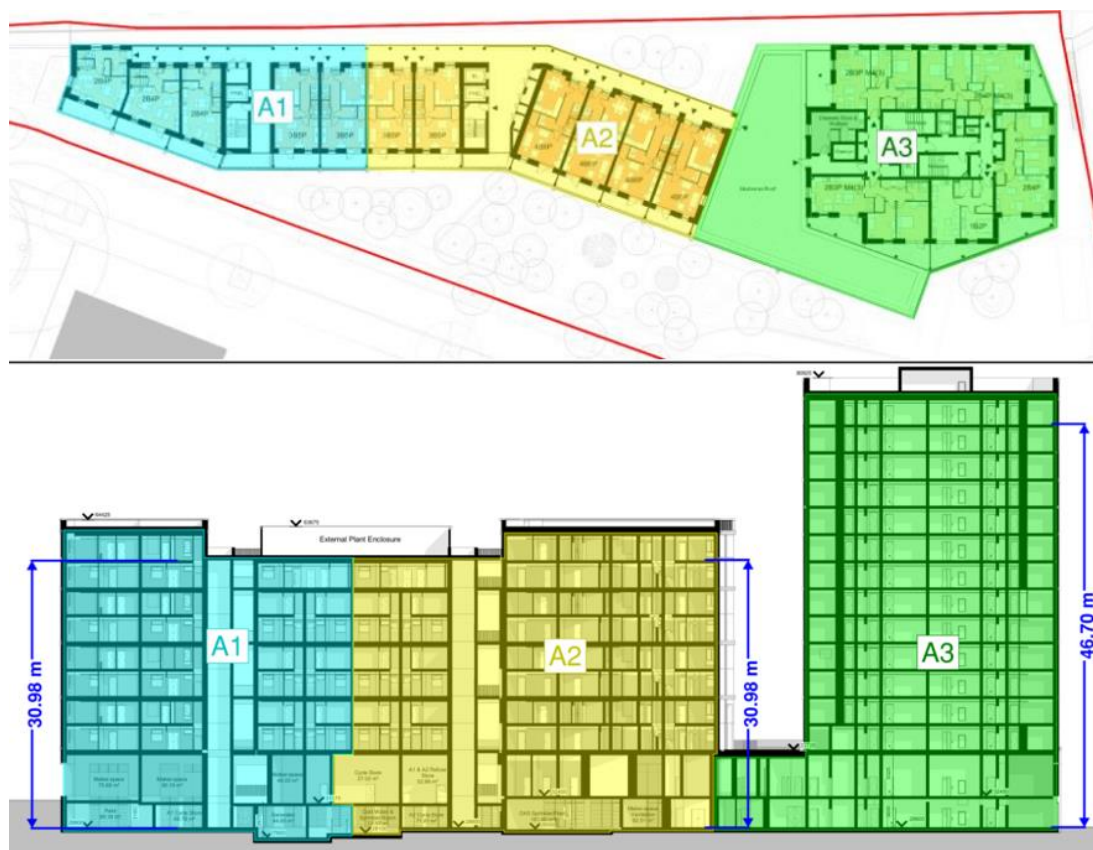


Figure 65 - Plan and section of the three relevant buildings

- 23.6 The buildings would be constructed in reinforced concrete, with external façade materials being Class A1 or A2 fire rated, meaning the materials are non-combustible. Roofs meet required fire resistance standards, and where green roofs are proposed, their final design will need to follow the national guidance to ensure they do not allow fire to spread.
- 23.7 The development includes sprinklers in all residential homes and commercial areas, with automatic fire detection throughout, automatic smoke ventilation to corridors and stairs (Block A3), natural ventilation and downstands (Block A1/A2), and emergency lighting and signage throughout the buildings. Building compartmentation would slow fire spread and keep escape routes safe.
- 23.8 The residential parts of the buildings use a “stay put” strategy, meaning each flat is designed to contain a fire for long enough that other residents do not need to evacuate immediately. Residents can still choose to leave if they



wish. This strategy relies on strong internal fire resisting construction and automatic detection inside each flat.

- 23.9 The creative maker spaces on the lower floors would be evacuated at the same time if the fire alarm sounds.
- 23.10 Blocks A1 and A2 are connected by balconies/deck access. Block A1/A2 will be provided with two fire-fighting stairs that can be accessed by occupants of both blocks (or firefighters) via the decks. Block A3 will also be provided with two stair cores - a fire-fighting stair and an escape stair.

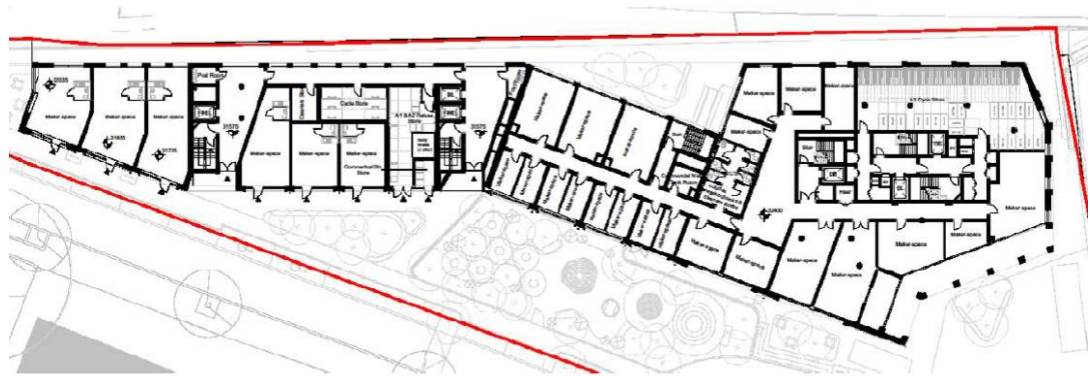


Figure 66 - Floorplan showing location of cores (to right, centre and left)

- 23.11 Each block includes evacuation lifts designed to keep working in a fire and allow people who need step free access to leave safely and with dignity. Temporary waiting spaces (safe places to wait near the lift) are sized so that wheelchair users can use them.

#### ***Access for firefighting***

- 23.12 Fire service vehicles, including large turntable ladders, can reach each block via Wrotham Road (Block A1/A2) and Camley Street (Block A3). A turning area is provided for appliances at Block A3. Access routes meet the London Fire Brigade Guidance.
- 23.13 Dry riser inlets are located within 18 metres of fire appliance parking points, and all parts of the buildings fall within required hose length distances (45m for A1/A2 and 60m for A3). The fire appliance positions and dry riser inlets are shown in pink below, with the existing fire hydrant on Wrotham Road in yellow.



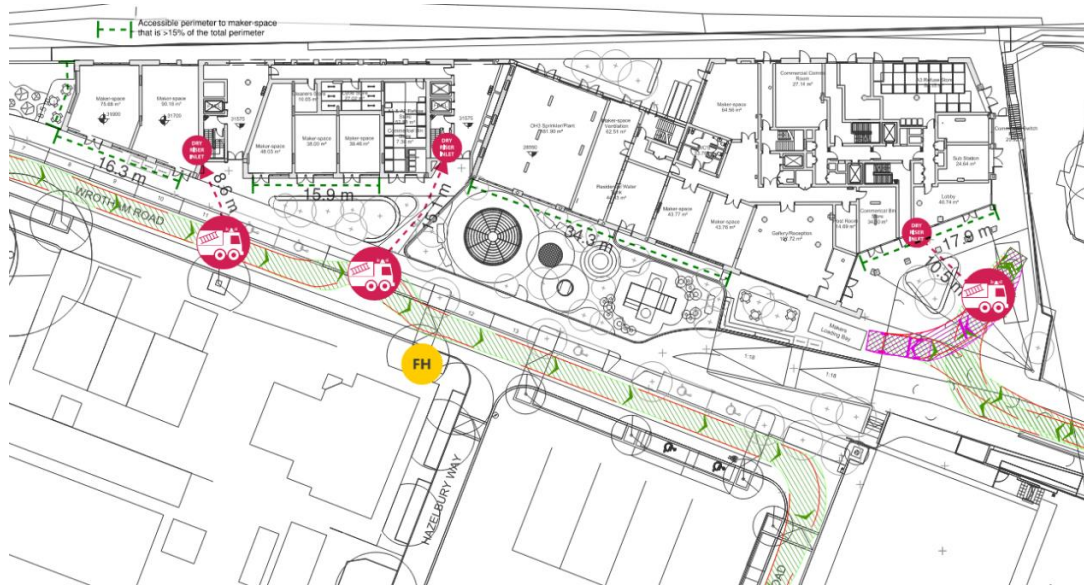


Figure 67 - Fire-fighting access to the site

- 23.14 In the event of significant flooding, access to block A3 via Camley Street (under the bridge) could be restricted. As such, a condition is needed to require a Flood Risk Emergency Plan (FREP). This would ensure safe evacuation in the event of a flood, including demonstrating that the cycle and pedestrian ramp linking Wrotham Road and Camley Street could accommodate emergency vehicles in the event of a serious flood (see Flooding section for more detail).
- 23.15 The GLA confirmed in their Stage 1 response that they are content with the fire strategy for the site subject to securing the measures set out in the submitted reports. The measures set out in the fire statements would be secured by condition 17. Condition 18 would ensure ongoing interim access for fire appliances during construction for any occupied buildings.
- 23.16 The HSE has also reviewed the scheme as part of Planning Gateway One and confirmed it is content with the fire safety design, to the extent that it affects land use planning. It will be for the applicant to demonstrate compliance with building regulations at the Building Control stage.
- 23.17 Whilst not for the planning stage, the HSE identified several matters for the applicant to consider and address at later stages in the Gateway process, they are included here for information purposes and transparency. This includes further evidence or information on:
- Safety of open lift lobbies (Block A1/A2)
  - Smoke management and wind direction analysis
  - Mechanical smoke ventilation strategy in Block A3
  - Risk and design of EV charging and storage (bikes and scooters)
  - Detailed design and management of PVs and green roofs

### ***Conclusion***

- 23.18 The HSE and the GLA have confirmed they are satisfied with the details provided at this stage. The fire safety measures confirmed at this stage in the planning process are acceptable and provide the framework for detailed measures which will be subject to later regulatory consideration through the later Gateways.
- 23.19 As such, the proposal complies with the national fire safety regime and the requirements of the development plan, particularly having regard to London Plan policies D5 and D12.

## **24. AIR QUALITY**

- 24.1 London Plan Policy SI1 states that masterplans for large-scale development proposals subject to an EIA should consider how local air quality can be improved across the area of the proposal as part of an Air Quality Positive (AQP) approach. At a local level, CLP policy CC4 seeks to ensure that the impact of development on air quality is mitigated and ensures that exposure to poor air quality is reduced in the borough. The Council will consider the impact of air quality when assessing development proposals, through the consideration of both the exposure of occupants to air pollution and the effect of the development on air quality. CPG Air Quality 2021 recognises the AQP approach.
- 24.2 Development that involves significant demolition, construction or earthworks will also be required to assess the risk of dust and emissions impacts in an Air Quality Assessment (AQA) and include appropriate mitigation measures to be secured in a Construction Management Plan.
- 24.3 The application site is not within an Air Quality Focus Area (AQFA); however, the east and south boundaries of the site run adjacent to railway lines including the London St Pancras to Trent South Junction rail line which has a heavy traffic of diesel passenger trains.

### ***Impacts on local air quality (operational)***

- 24.4 The development will be car-free with no on-site car parking spaces provided (apart from disabled bays) and powered by all-electric heating by way of Air Source Heat Pumps (ASHPs). The proposals are therefore considered to be Air Quality Neutral for building and transport emissions.
- 24.5 One diesel emergency generator is proposed at site A. A Condition is recommended to ensure that alternatives to diesel such as Uninterruptable Power Supply (UPS) or a secondary mains feed are considered, and to ensure the generator is appropriately sized, located and maintained to minimise air quality impacts.

- 24.6 All generator flues will be at least 1m above roof level of all surrounding buildings in at least a 20m radius which is acceptable. A condition is recommended that shall secure the requirement for the flue / exhaust from the generator to be located away from air inlet locations, and if this is not possible, for details to be provided of mitigation including how residents will be alerted to generator testing and operation.

***Impacts on occupants***

- 24.7 Air pollution is expected to be reduced at the site through measures that reduce private vehicle use such as car free development, travel plans and improvements to the local pedestrian and cycle environment as well as through the removal of the existing industrial uses. The development also utilises all-electric heating, which would maximise the air quality of the scheme.
- 24.8 However, considering the current air pollution for the site and air quality standards, although the application site is not within an Air Quality Focus Area (AQFA); the north and eastern boundaries of the site run adjacent to railway lines including the London St Pancras to Trent South Junction rail line which has a heavy traffic of diesel passenger trains. If the background NO<sub>2</sub> concentration were above 25µg/m<sup>3</sup> then there is considered to be a risk of exceedance of the NO<sub>2</sub> annual mean objective. It is noted that the baseline was just below 25µg/m<sup>3</sup> in 2024 for site A (22.14µg/m<sup>3</sup>) and is closer to this threshold when estimating the concentrations with development in place (24.25µg/m<sup>3</sup>). Given the proximity of the railway to residential buildings, the use of 'estimated' thresholds and the need to consider particulate matter (PM) which is also a concern in relation to pollution from diesel trains, then it is recommended that further consideration is made of the potential pollution from the railway.
- 24.9 The overall baseline monitoring / modelling approach is considered to be generally acceptable for all aspects other than rail, which officers consider needs to be considered in more detail due to the proximity to the railway. It is therefore recommended that an automatic real-time air quality monitoring sensor is placed on each of site A and B at the closest point to the rail lines to carry out a baseline monitoring period to establish the impact of rail on the future occupants. If air pollution exceeds the National Air Quality Objective levels for the proposed uses then additional mitigation must be implemented, retained and maintained.
- 24.10 Subject to the above condition and further consideration of the railway emissions and the requirement for further mitigation, the proposed residential use is appropriate at this site.
- 24.11 It is noted that the Air Quality Positive Statement states "As air quality was determined to be acceptable, mechanical ventilation was not anticipated to

be required.” However, the Energy Statement by Hoare Lea clarifies that all buildings will include MVHR. As such, to protect indoor air quality, air inlets should be located away from emission sources including the railway and all flues. Full details of the mechanical ventilation system including air inlet locations shall be secured by a condition is recommended to ensure occupants are not exposed to poor air quality.

### ***Demolition and construction impact***

- 24.12 The overall dust risk during construction and demolition is considered ‘Medium’. The construction impact on local air quality is also an important issue raised by many residents in their consultation responses, particularly as it tends to have disproportionate impacts on the young, the elderly, and those with long term respiratory conditions. Appropriate mitigation is recommended which would be secured through the **Construction Management Plan by shadow s106 legal agreement** to ensure that impacts to sensitive receptors are minimised and most of the potential negative air quality impacts resulting from the construction phase will be negated. Two monitors will be required to be installed on the each of the sites for the duration of the construction phase until completion. Details of the locations, monitoring strategy and the sensor specification shall be secured by condition. Non-road mobile machinery must also be compliant with Low Emission Zone requirements as secured by a recommended condition.

## **25. WASTE AND RECYCLING**

- 25.1 Policy CC5 ‘Waste’ and CPG Design are relevant with regards to waste and recycling storage and seek to ensure that appropriate storage for waste and recyclables is provided in all developments.
- 25.2 The development will have separate bin stores for each use, with storage at upper and lower ground floors. The waste storage for residential blocks A1 and A2 is at the base of A2, near the core entrance. The waste storage for residential block A3 is at the bottom of block A3, along with a separate waste store for the commercial space. Due to the difference in levels across the proposed development, servicing access to the lower ground level is from Camley Street (block A3), and the upper ground level is accessed from Wrotham Road (block A1/A2). A draft delivery, servicing and waste plan has been submitted which was reviewed and updated with input from the Council’s Waste Management team. Bulky waste external collection points are now also included for residents. Residents will present external items prior to agreed collections to minimise the time items are left outside.
- 25.3 Final details for domestic and commercial waste collection would be secured by the **Delivery and Servicing Management Plan (DSMP) secured by shadow s106 agreement**. Condition 15 would secure the waste stores installation prior to first occupation of each use.

- 25.4 The proposals for waste and recycling storage are acceptable and in accordance with policy CC5.

## **26. CONTAMINATED LAND**

- 26.1 Policy A1 of the Camden Local Plan requires consideration of land contamination in development proposals to protect residents' amenity. Assessing and remediating contaminated sites helps prevent health risks from exposure and environmental harm, both during and after construction activities.
- 26.2 A Geotechnical and Contamination Desk Study Report has been prepared by GEA which covers both the application site (site A) and site B (3-30 Cedar Way, ref: 2025/4364/P) for which there is a parallel planning application. The study highlights contamination risk from a number of sources which include:
- Historic use of site may have resulted in localised spillages and leaks of hydrocarbons, coal dust, metal particulates and asbestos fibres, and ash ballast.
  - Since c. 1974-1985, the northern half of the site was used for vehicle repairs and servicing, which may have resulted in localised spillages and leaks of hydrocarbons, heavy metals and solvents.
  - Above ground storage tanks were identified, including surface staining of the hardstanding. The tanks, drums and vehicle storage represent possible sources of hydrocarbon contamination. The hydrocarbon contamination represents a possible source of soil vapour.
  - The electrical substations are possible sources of PCB contamination.
- 26.3 The report indicates a Low to Medium risk of contaminant linkages at this site, with identified receptors of the proposed development considered to be a high sensitivity. Any soft landscaping will present a potential exposure pathway. Buried services may be exposed to any contaminants present within the soil through direct contact and site workers will come into contact with the soils during construction works.
- 26.4 Whilst the report indicates no risk from soil gases on site, there is considered to be the potential for made ground beneath the site (from previous development), along with potential hydrocarbon impacts from previous tanks and the repair garage and possible historic leaks/spills. As such, it is recommended that gas monitoring is incorporated into the proposed site investigation where potential hydrocarbon-impacted soils and/or deep made ground/organic rich material is encountered.
- 26.5 The applicant's desk study recommends a ground investigation to assess the risks associated with any potentially contaminated soils. Conditions are recommended for a phased contaminated land condition comprising a site

investigation and (where required) a subsequent remediation strategy and verification report (Conditions 49, 50, and 51).

- 26.6 The Health and Safety Executive (HSE) is responsible for enforcing asbestos regulations across the UK. National Planning Policy Guidance states that conditions requiring compliance with other regulatory regimes will not meet the test of necessity and may not be relevant to planning. In view of this it is not considered appropriate or necessary to condition for this survey to be undertaken. An informative will be attached reminding the applicant that they may need other consents in respect of the safe handling and removal of asbestos.
- 26.7 The Council's contaminated land officer who has reviewed the submission considers the desk study to be satisfactory and the proposal complies with policy A1 subject to the conditions set out above. As such the scheme complies with the development plan insofar as contaminated land is concerned.

## **27. SUSTAINABILITY AND ENERGY**

- 27.1 In November 2019, Camden Council formally declared a Climate and Ecological Emergency. The current Camden Climate Action Plan 2026-2030 seeks to respond to the urgency of the climate crisis, enabling zero carbon and a climate resilient borough.
- 27.2 In line with London Plan (LP) policies, SI1, SI2, SI3, SI4, SI5 and SI7 and Camden Local Plan (CLP) policies CC1, CC2, CC3, and CC4, development should follow the core principles of sustainable development and circular economy, make the fullest contribution to the mitigation of and adaptation to climate change, to minimise carbon dioxide emissions and contribute to water conservation and sustainable urban drainage.

### ***Circular Economy***

- 27.3 CLP policy CC1 and LP policy SI7 require proposals involving substantial demolition to demonstrate that it is not possible to retain and improve the existing building, and to optimise resource efficiency.
- 27.4 The redevelopment strategy involves complete demolition of the existing buildings, having explored options of retrofit and retention.
- 27.5 In line with Energy Efficiency and Adaption CPG, a detailed Pre-Demolition Audit, pre-Redevelopment Audit, Sustainability Strategy and Energy Statement were prepared and submitted with this application.
- 27.6 The pre-redevelopment audit assessed options for the existing buildings, including retention and retrofitting, partial refurbishment, disassembly and reuse, and demolition with material recycling. The buildings were found to be



structurally poor, thermally inefficient, and equipped with outdated mechanical and plant systems, making retention impractical. Replacing them with energy-efficient, usable buildings that make an effective use of the site was therefore deemed the most suitable approach. It also allows for the more efficient use of this brownfield site, which is currently under-utilised, to deliver new homes and commercial space, which is a key strategic objective of planning policy.

- 27.7 The audit highlighted several potential areas for reuse across the site including the steelwork from existing storage sheds and pop-up steel storage buildings. There are several buildings of steel frame construction and steel cladding that can be dismantled and reutilised as warehouses/ workshops on other developments. Once demolished, where buildings cannot be disassembled or reused the materials will be sensitively reused on site or recycled.
- 27.8 A Circular Economy Statement (CES) has been provided with the application. The development aims to go beyond the standard practice through maximising material recovery and high-quality recycling. The CES confirms that over 98% of the demolition arising will be diverted from landfill with an aim of securing 95% diversion of excavation materials for beneficial use and 98% of construction waste diverted from landfill. A minimum of 20% of the total value of materials for the proposed development will be derived from recycled and reused content, with a stated ambition exceeding 35%. These recycling and reuse measures shall be secured by condition.
- 27.9 Waste management measures will aim to exceed municipal waste recycling target of 65% (by weight/tonnage) and business waste recycling target of 75% (by weight/tonnage). The development has been designed to be disassembled at the end of its lifetime to reduce waste through incorporating modular features into the design.

### ***Whole Life Carbon***

- 27.10 A Whole Life Carbon Assessment (WLC) has been submitted with the application which assesses how any replacement building has considered the carbon impact of the new construction. WLC assessments are also required for all proposals including substantial demolition in Camden.
- 27.11 The Whole-Life Carbon (WLC) emissions are the total carbon emissions resulting from the construction and the use of a building over its entire life (60 years), and it includes its demolition and disposal. This is split into modules that assess each stage of the building's life.
- 27.12 The A-Modules concentrate on the emissions from the building materials (A1-A3 extraction, supply, transport and manufacture) and the construction stages (A4-A5 transport, construction and installation).

- 27.13 The B-Modules concentrate on the use stage of the building (B1-B5 use, maintenance, repair, replacement, refurbishment), but the modules that deal with operational energy and water use are excluded (B6-B7). This is because they are “regulated emissions” and so are considered separately and in detail in relation to the zero-carbon target (see the “Energy and carbon reductions” section below).
- 27.14 The C-Modules deal with the end-of-life stage of the building (C1-C4 deconstruction demolition, transport to disposal, waste processing for reuse, recovery or recycling, disposal).
- 27.15 The GLA WLC assessment guidance sets out minimum benchmarks for different building typologies per square metre of gross internal area in kilograms of carbon equivalent ( $\text{kgCO}_2\text{e/m}^2$  GIA). These minimums are not policy requirements, but a target to demonstrate consideration has been given to WLC. The assessment guidance also encourages development to aim for more ambitious aspirational benchmarks. The table below shows how the development performs against the guideline benchmarks, as well as the aspirational targets.

<b>Modules</b>	<b>Min benchmark RESIDENTIAL (<math>\text{kgCO}_2\text{e/m}^2</math> GIA)</b>	<b>Aspirational Benchmark for RESIDENTIAL (<math>\text{kgCO}_2\text{e/m}^2</math> GIA)</b>	<b>Proposal (<math>\text{kgCO}_2\text{e/m}^2</math> GIA)</b>
A1-A5	<850	<500	569
B-C (excl B6 & B7)	<350	<300	288
Total A-C (excl B6&B7 but inc sequestration)	<1200	<800	820

*Table 11 - Summary of Whole-Life Carbon results assessed against residential development benchmarks*

- 27.16 In this case, the development meets the minimum benchmarks for modules A1-A5 and modules A-C (including sequestration) but does not meet the aspirational benchmarks as shown above other than for modules B-C. However, it is close to the other aspirational benchmarks, including that for modules A-C.
- 27.17 There is a high level of cement replacement in the substructure assumed at 60% and 50% in the superstructure but 0% generic concrete. The structural steel assumes recycled content of 20%, studwork 15% in line with RICS, with 97% assumed to be recycled for reinforcement bars. The applicant has committed to these and as the design process progresses the supply of

recycled materials will be confirmed. The proposed global warming potential of the refrigerants to be used in the development is considered reasonable.

- 27.18 Updated WLC assessments for the final detailed design would be required before any works, and again prior to construction (condition 35). Prior to first occupation of the development a post-construction assessment of WLC must be completed and this can be secured by condition 36.
- 27.19 As such, the whole life carbon objectives for this development proposal are considered acceptable.

### ***Energy and carbon reductions***

#### Energy and carbon summary

- 27.20 To minimise operational carbon, development should follow the energy hierarchy set out in the London Plan (2021) Chapter 9 (particularly Policy SI2 and Figure 9.2) and major developments should meet the target for net zero carbon. The first stage of the energy hierarchy is to reduce demand (be lean), the second stage is to supply energy locally and efficiently (be clean), and the third step is to use renewable energy (be green). The final step is to monitor, verify and report on energy performance (be seen).
- 27.21 After carbon has been reduced as much as possible on-site, an offset fund payment can be made to achieve net zero carbon.
- 27.22 The following tables show how the proposal performs against the policy targets for operational carbon reductions in major schemes, set out in the London Plan and Camden Local Plan.
- 27.23 The site-wide total reductions meet the 35% target:

<b>Policy requirement (on site)</b>	<b>Min policy target</b>	<b>Proposal reductions</b>
Be lean stage (low demand): LP policy SI2	10%	6.7%
Be green stage (renewables): CLP policy CC1	20%	64.4%
Total carbon reduction: LP policy SI2 and LP CC1	35%	66.8%

*Table 12 - Site-wide detailed carbon saving targets*

- 27.24 The following tables give breakdowns for residential and non-residential uses on site:

<b>Policy requirement (on site) RESIDENTIAL</b>	<b>Min policy target</b>	<b>Proposal reductions</b>
Be lean stage (low demand): LP policy SI2	10%	6.7%

Be green stage (renewables): CLP policy CC1	20%	62%
Total carbon reduction: LP policy SI2 and LP CC1	35%	64.6%

*Table 13 - Residential use – detailed carbon saving targets*

<b>Policy requirement (on site) -NON RESI</b>	<b>Min policy target</b>	<b>Proposal reductions</b>
Be lean stage (low demand): LP policy SI2	15%	6.6%
Be green stage (renewables): CLP policy CC1	20%	130.2%
Total carbon reduction: LP policy SI2 and LP CC1	35%	128.2%

*Table 14 - Non-Residential use – detailed carbon saving targets*

- 27.25 The operational carbon savings and measures as discussed below will be secured under an Energy and Sustainability Strategy **secured by shadow s106 agreement** which includes monitoring in compliance with the development plan.

Total carbon reductions

- 27.26 Reductions are measured against the baseline which are the requirements set out in the Building Regulations. Major development should aim to achieve an on-site reduction of at least 35% in regulated carbon emissions below the minimums set out in the building regulations (Part L of the Building Regulations 2021). To achieve net zero carbon, a carbon offset payment will be secured that offsets the remaining carbon emissions caused by the development after the required on-site reductions, measured from the agreed baseline.
- 27.27 This is charged at £95/tonne CO<sub>2</sub>/yr (over a 30-year period) which for the development proposal on Site A is 60.1 tonnes x £95 x 30 years = £171,336. This amount will be spent on delivery of carbon reduction measures in the borough.
- 27.28 It is also acknowledged that changes to Part L 2021 with SAP10.2 carbon factors have potentially made the carbon targets more challenging for non-residential developments to achieve at the present time. This is because the new Part L baseline now includes sources of low carbon heating (such as air source heat pumps) for non-residential developments.
- 27.29 Residential development should now commonly be exceeding the target and therefore GLA guidance has introduced a more challenging aspirational target of 50% on-site total savings for residential proposals.
- 27.30 The proposed development on Site A performs well and significantly improves on the policy target of 35% reductions by achieving an overall on-

site reduction of 66.8% below Part L requirements. The residential part also exceeds the GLA's 50% aspirational target with a 64.6% reduction. The non-residential areas significantly exceed the stated target of 35% by securing a substantial 128.2% reduction in carbon because it provides a small amount of offset to the residential area.

- 27.31 However, this is not a zero-carbon development and as such there is a carbon offset payment of £171,336 required which will be **secured by shadow Section 106 legal agreement** to bring it to zero carbon, in compliance with the development plan.

Be lean stage (reduce energy demand)

- 27.32 London Plan policy SI 2 sets a policy target for reductions of at least a 10% for residential and 15% for non-residential through reduced energy demand at the first stage of the energy hierarchy.

- 27.33 The proposals include good air permeability with efficient walls, roof and windows. However, the curtain walling design of the makerspace, whilst better than building regulations, impacts on the thermal efficiency as it has a similar efficiency to windows and is not as efficient as a normal wall. The design includes low energy lighting with auto off control, mechanical ventilation heat recovery (MVHR) but also active cooling to some units which are affected by railway noise (and so use of natural ventilation is more restricted) which would impact on the overall energy efficiency. Wastewater heat recovery is not included in this proposal.

- 27.34 The development does not meet the energy efficiency (be lean) carbon reduction targets. Further consideration should be made to energy efficiency reductions. This can be secured through condition 32.

Be clean stage (decentralised energy supply)

- 27.35 London Plan Policy SI3 requires developers to prioritise connection to existing or planned decentralised energy networks, where feasible, for the second stage of the energy hierarchy. Camden Local Plan policy CC1 requires all major developments to assess the feasibility of connecting to an existing decentralised energy network, or where this is not possible establishing a new network.

- 27.36 The Kings Cross and Somers Town heat networks are in close proximity to the proposed development. The applicant has contacted representatives of these networks who have confirmed it is not feasible to connect to either of these networks due to distance and the railway providing a barrier. Evidence of this correspondence has been submitted to the Council.

- 27.37 A site-wide heat network is proposed for Site A supplied by a centralised energy centre. All apartments will be connected to the heat network. The carbon savings for site wide networks are considered under 'Be Green'

(renewable energy – see below). The applicant has confirmed the proposed development will be designed to allow connection to a district heating network should this be possible in the future. This should include a single point of connection to the district heating network. The development design already includes space for future heat exchanger plant and a planned route for connection to the site boundary. This future connection can be secured through the **shadow s106 legal agreement**.

27.38 Provision of a single network across Site A and Site B is extremely challenging due to the constraints imposed by east-west railway line between the sites and the limited space available through the Network Rail bridge underpass on Camley Street. As such, it is accepted that a single network between the two sites is not achievable here.

27.39 Therefore, it is considered that the Be Clean policy requirements of CC1 and London Plan SI 3 have been met.

Be green stage (renewables)

27.40 CLP policy CC1 requires all developments to achieve a 20% reduction in CO2 emissions through renewable technologies (after savings at Be Lean and Be Clean), where feasible, for the third stage in the energy hierarchy.

27.41 The development site-wide significantly exceeds the policy target of 20%, reducing emissions by 64.4% through renewables. The minimal commercial floorspace taken in isolation significantly exceeds the policy target of 20% with a reduction of 130% and the high performance of the residential elements with a 62% reduction means the development meets the target overall.

27.42 331sqm of solar PV panels would be provided on the roofs of Buildings A1-A3. Other spare roof areas are utilised for plant, and as such it is considered that PV provision has been maximised. Details will be secured by condition 28.

27.43 Heat pumps would be provided in the form of a (centralised) LTHW (Low Temp Hot Water) ASHP (Air Source Heat Pump) system serving the residential units with supplementary electric boilers. VRF (Variable Refrigerant Flow) and multi-split systems are proposed to the makerspace. 95% of the heat for the development would be provided by the ASHPs. ASHPs will not be permitted for cooling and this can be controlled by condition 63. Insulated pipework would be used to minimise distribution losses.

Be seen (energy monitoring)

27.44 London Plan policy SI 2 requires the monitoring of energy demand and carbon emissions to ensure that planning commitments are being delivered.



- 27.45 The development will be designed to secure energy performance monitoring and this will be secured through the **shadow Section 106 legal agreement** in line with GLA guidance.

***Climate change adaption and sustainable design***

- 27.46 Local Plan policy CC2 expects non-residential development over 500sqm to meet BREEAM Excellent.
- 27.47 The development proposal would achieve BREEAM New Construction Excellent for the non-domestic parts of the scheme (i.e. the makerspace) with 68% of the energy credits, 78% of the water credits and 93% of the material credits which meets the requirements. It is also proposed to achieve BREEAM Residential of 3.5 stars (out of 5) and a 4.5-star rating is possible if all potential credits are sought. This certification on both the residential and non-residential elements of the scheme is supported and shall be secured by **shadow s106 agreement**.
- 27.48 To determine if the units are designed to would stay cool with only natural ventilation and passive measures Dynamic Thermal Modelling has been undertaken for the residential units using CIBSE TM59 methodology, as set out in guidance.
- 27.49 35% (42 units) of apartments on Site A are affected by external noise therefore are not able to rely on natural ventilation and will overheat. As such 'peak lopping' (also known as air tempering) of MVHR is proposed which is a lower energy form of cooling and is generally considered acceptable where natural ventilation is not possible. At 22 degrees the air system starts to apply a small level of cooling to the incoming air. However, this should only be installed for those units where external noise mitigation is required.
- 27.50 Through the site management strategy, the level of heat control within homes will be managed centrally to be within a certain temperature range to avoid excessive cooling and to limit the output to control the management of overheating requirements only. Homeowners will need to submit a formal request and the management team for any temperature range alterations.
- 27.51 For DSY2 and DSY3, which are future weather scenarios for a short intense warm spell and a long intense warm spell, there are significant failures for some units, and in particular for Block A3. Whilst spaces do not need to comply with the future weather scenarios consideration of these should be made and Camden Policy CC2 does require development to be resilient to climate change. Therefore, it is recommended that the additional measures mentioned including external blinds should be included in the design to help mitigate this risk.
- 27.52 The policy requirement for 105 litres of water for internal use per person per day for residential areas would be met. Water monitoring is proposed via

connection to a building management system. Water consumption will be minimised via low-flow sanitaryware and water-harvesting technology with rainwater harvesting specifically proposed for Building B3 (commercial). Details can be secured by condition.

- 27.53 Biodiverse/green roofs are provided on all roof spaces excluding areas required for plant storage which will help reduce overheating risk. These will also help manage surface water drainage, in addition to other sustainable drainage measures which are discussed in the 'Flood risk and drainage' section below.



Figure 68 - Roof plan for development on Site A showing biodiverse roofs

### **Conclusion**

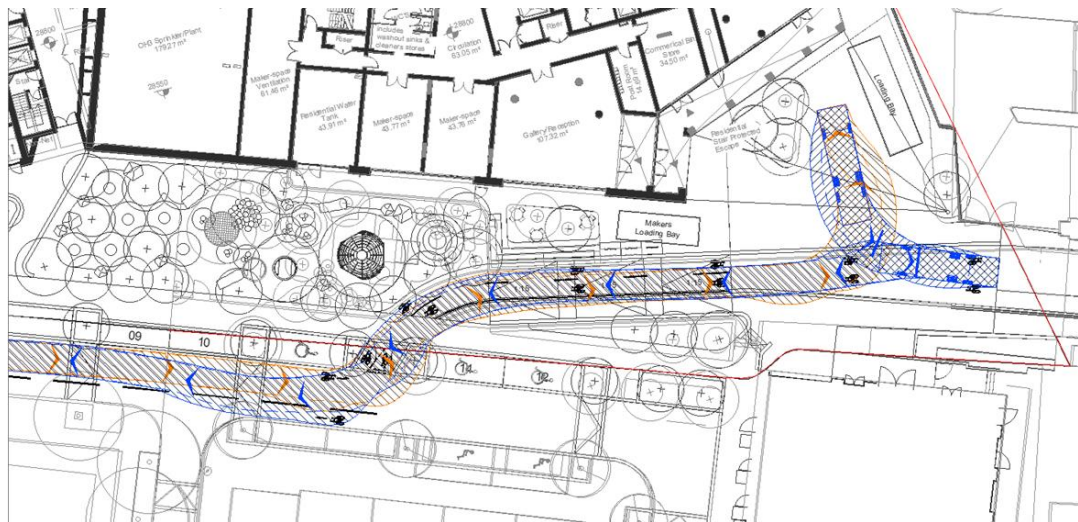
- 27.54 The proposed redevelopment demonstrates a comprehensive approach to sustainability and energy, aligning with both Camden and London Plan policies.
- 27.55 There are significant carbon reductions and resource efficiency is maximised, with clear commitments to circular economy principles and climate change adaptation. The scheme meets other key policy targets, including providing future-proofed energy infrastructure, provides site greening, and includes measures to mitigate flood risk and overheating.
- 27.56 Overall, the development complies with the development plan in terms of energy and sustainability and will contribute meaningfully to a net zero future in line with the NPPF.

## **28. FLOOD RISK AND DRAINAGE**

- 28.1 CLP policy CC3 requires developments to avoid increasing flood risk and, where possible, reduce it. This includes assessing impacts in flood-prone areas, incorporating flood resilience measures, and using Sustainable Drainage Systems to achieve greenfield runoff rates.

- 28.2 LP Policy SI 13 highlights London's vulnerability to surface water flooding, calling for developments to manage runoff near its source and prioritise green infrastructure according to the drainage hierarchy. LP policy GG6 emphasises designing developments to improve efficiency and resilience, considering climate change and flood risks.
- 28.3 There are 3 flood zones for flooding by rivers and the sea as defined by the Environment Agency; Flood Zones 1, 2 and 3. The site is in Flood Zone 1, like all Camden sites, and so is low risk from flooding from rivers and sea.
- 28.4 The site is in the Counters Creek catchment area and has a high risk of surface water flooding in the south-western corner of the site, and some areas of medium risk along Camley Street with increased risk with climate change. The development therefore has potential for surface water flooding without mitigation. Policy CC3 states that vulnerable development should not be located in flood prone areas.
- 28.5 A Flood Risk Assessment and a Drainage Impact Assessment have been submitted as part of this application. The development incorporates SuDS to manage the water environment, including blue roofs, green roofs, permeable paving, and attenuation tanks. The proposals include 103m<sup>3</sup> roof storage in 1,085m<sup>2</sup> of blue /green roofs, 34m<sup>3</sup> of storage in 332m<sup>2</sup> of pervious pavements and 328m<sup>3</sup> of attenuation tanks. Conditions would ensure the final SuDS details are submitted and implemented (conditions 29 and 30).
- 28.6 A runoff rate of 5.1l/s is proposed for the whole site which meets the greenfield runoff rate for a 1 in 100-year storm event. It is also a significant reduction on the 72l/s for the existing site for a 1 in 100-year storm event. This means there is likely to be a notable improvement over the surface water runoff for the current site. However the proposed storage capacity of 465m<sup>3</sup> is not sufficient to meet this discharge rate and therefore the final SuDS details (secured by the aforementioned condition) will need to ensure the drainage strategy provides adequate storage.
- 28.7 The National Standard for sustainable drainage systems (SuDS) by DEFRA state that "The surface water drainage system shall be assessed for exceedance events in excess of the 1% AEP (1 in 100 year) event with expected exceedance routes identified across the development to confirm there is no adverse flood risk to the development or elsewhere". The provided exceedance event diagram, which shows flows of surface water from the site in the event of a storm over 1 in 100 year event, indicates that flows of water are not managed within the site and flow towards the railway to the east of the site and towards Camley Street under the railway where water is likely to accumulate. This is not acceptable, and the final design of the scheme needs to ensure that as much as possible of exceedance flows are captured downstream and minimise the risk to buildings and people.

- 28.8 Due to the surface water flooding on site a Flood Risk Emergency Plan (FREP) is also required for the site. This has not yet been provided but a plan of flood evacuation routes has been provided which indicates that based on existing surface water flood risk occupants would be required to evacuate through areas of surface water. In addition, the surface water flood risk for the main access and emergency access to block A3 via Camley Street, under the rail bridge, could be restricted by surface water which may be too deep for emergency vehicles in some storm events. As such further details are required to ensure the development can be made safe and is therefore acceptable.
- 28.9 Alternative access down the cycle and pedestrian ramp linking Wrotham Road and Camley Street is proposed. The plan below shows the path tracking for a fire tender is possible.



*Figure 69 - Fire tender alternative access (Wrotham Road) to A3 in event of flooding*

- 28.10 Details of this access should be included in any Flood Risk Emergency Plan (FREP) to ensure safe evacuation and recovery. The condition would ensure the measures set out in the FREP, including signage and emergency access arrangements, have been fully implemented before occupation (condition 60).
- 28.11 Thames Water have requested conditions requiring confirmation of adequate off-site capacity, completion of any necessary network reinforcement, or agreement of an infrastructure phasing plan prior to occupation for both foul water and surface water drainage (condition 41).
- 28.12 They also identified that the current water supply network cannot accommodate the needs of the development and so have also requested a condition to ensure sufficient water supply capacity (condition 42).

- 28.13 Because the site lies within 15 metres of strategic sewers and water mains, and within 5m of a strategic water main, Thames Water require a condition securing submission and approval of a Piling Method Statement, and details to protect or divert the water main to ensure protection of underground water infrastructure (conditions 20 and 43).
- 28.14 They also requested informatives about groundwater risk management, construction near their assets, both of which would be attached.
- 28.15 Whilst the proposals seem to improve the surface water run off over the existing site, further details are required to confirm if the proposals provide adequate storage, if the site can appropriately manage exceedance flows, and if the flood risk emergency plans will meet requirements, and therefore be acceptable and fully comply with the development plan insofar as flooding and drainage are concerned.

## **29. EMPLOYMENT AND TRAINING**

- 29.1 Policies E1 and E2 seeks to secure employment and training opportunities for local residents and opportunities for businesses based in the Borough to secure contracts to provide goods and services. CPG Employment Sites and Business Premises (Employment CPG 2021) sets out that the Council will use S106 agreements to secure local employment and training initiatives.
- 29.2 The proposed development of Site A is a mixed-use scheme providing new homes and some commercial floorspace. There will be employment benefits from the scheme through the construction and end use phases.

### ***Construction Phase***

- 29.3 The scheme could deliver a range of training and employment benefits during the construction phase which would benefit local residents and businesses. As well as the direct economic and employment benefits, local employment and training opportunities can help to maximise health benefits for residents (see 'Health Impact' section). This package of recruitment, apprenticeship and procurement measures will be secured via shadow S106 legal agreement and will comprise:

- Construction apprenticeships and work placement opportunities through the King's Cross Construction Skills Centre;
- Local employment; and
- Local Procurement.

### ***Construction Phase***

- 29.4 Apprenticeships - as the build cost for this scheme would exceed £3 million the applicant must recruit one construction apprentice paid at least London Living Wage per £3million of build costs and pay the council a support fee of

£1,700 per apprentice as per section 63 of the Employment CPG. Recruitment of construction apprentices should be conducted through the Council's King's Cross Construction Skills Centre. This equates to **22 apprenticeships and a £37,400 financial contribution** over the course of the development.

- 29.5 Construction Work Experience Placements - the applicant should provide **construction work placements** of not less than 2 weeks each, to be undertaken over the course of the development, to be recruited through the Council's King's Cross Construction Skills Centre, as per section 69 of the Employment CPG. The final number is to be confirmed.
- 29.6 Local Recruitment – the Council's standard local recruitment target is 20%. The number of **construction jobs to be recruited locally** is to be confirmed. The applicant will work with the Kings Cross Construction Skills Centre to recruit to vacancies, advertising with the Council for no less than a week before the roles are advertised more widely.
- 29.7 Local Procurement – The applicant must also sign up to the Camden Local Procurement Code, as per section 61 of the Employment CPG, which sets a target of **20% local procurement** of the total value of the construction contract.

#### ***End Use / Occupation Phase***

- 29.8 The proposed development includes the provision of 2,119sqm of commercial floorspace, which is designed as creative maker space Class E (g) but could be used by a wider range of uses in the long-term. It is proposed that 100% of the floorspace is secured as affordable accommodation. The space is flexible and incorporates a mix of larger units which could be used for light industrial making type activities or smaller artist studios. The spaces have been designed to support start up and small businesses. Further details of the affordable workspace will be discussed at secured through **shadow s106 legal agreement**.
- 29.9 The development has the potential to have a substantial positive impact on the local economy, both through economic activity related to the construction process, the provision of affordable makerspace which would be suitable for SMEs and through new residents and workers being brought to the area and uses existing businesses. By directing opportunities to local residents, this will also have long-term health benefits.
- 29.10 An employment and training contribution will also be confirmed which will be secured through the shadow **Section 106 legal agreement**.
- 29.11 Given the above, the proposals are in accordance with the development in relation to employment and training.



## 30. HEALTH IMPACT

### *Policy context*

- 30.1 CLP policy C1 and LP policy GG3 promote strong, vibrant, and healthy communities and seek to tackle health inequalities. Healthy and inclusive communities are a key objective of the Council, supported by the development plan's commitment to improving health through a range of policies, such as affordable housing, housing quality, active travel, and seeking to reduce health inequality.
- 30.2 A Health Impact Assessment (HIA) has been submitted as part of this application. The assessment is based on the HUDU Rapid HIA Tool and considers the wider determinants of health - the social, economic and environmental factors that influence people's wellbeing. The HIA has been reviewed by Camden's Public Health Strategist.

### *Impact of the development*

- 30.3 The scheme would provide 119 new social rent homes, including a high proportion of family-sized units. All new homes meet or exceed national space standards, and 10% are fully wheelchair-accessible, with the remainder built to accessible and adaptable standards. This will directly improve living conditions for households in need of stable, affordable, high-quality housing.
- 30.4 The HIA identifies that the Camden Square ward experiences higher levels of deprivation, high disability rates, and pressure on local GP services. Camden's Health and Wellbeing Strategy notes population growth and intensification as key risks for healthcare access. Although the impact assessment finds there is sufficient provision for the residents of the proposed development (around 363 new residents), there is an increased risk of strain to healthcare access without mitigation.
- 30.5 In line with the first core guiding principle of the Camden Health and Wellbeing Strategy (Prioritising prevention) – the proposal responds with a preventative approach by embedding health-promoting features throughout the proposed development. The scheme includes new inclusive public spaces, improved pedestrian and cycle routes, and accommodation designed to support independent living. These will help reduce local health inequalities - especially for disabled residents, families with young children, and people on low incomes (disability and age being protected characteristics).
- 30.6 The development would also create new employment and training opportunities supporting local economic inclusion. A package of **local employment and training opportunities will be secured by shadow s106 agreement**.

- 30.7 The scheme provides a significant uplift in outdoor space through Camley Yard, new play gardens, and a biodiversity garden at the site entrance. These spaces will increase opportunities for physical activity, social interaction and contact with nature. The design supports inclusive access, with level routes and natural surveillance from surrounding homes. New pedestrian and cycle links connect Camley Street to Agar Grove and Wrotham Road, with potential future links to the Camden Highline. These improvements support active travel (such as walking and cycling), which is known to reduce long-term risks of conditions like heart disease and obesity. The scheme is also car-free, except for disabled parking, helping reduce traffic, noise and local air pollution. These improvements are expected to support physical activity, mental wellbeing, and social cohesion.
- 30.8 The scheme integrates Secured by Design principles, with active ground-floor frontages, good lighting, and clear sightlines across the public realm. These measures reduce the risk and fear of crime, improving feelings of safety. This is especially important for groups who experience higher fear of crime which disproportionately affects women, older people, and ethnic minorities.
- 30.9 Homes will use an all-electric, energy-efficient design, helping prevent cold, damp conditions that can worsen respiratory illnesses. Sustainable drainage, green roofs and biodiverse planting will help manage flood risk, support wildlife and improve mental wellbeing through greener surroundings. Inclusion of fruit-bearing trees will also promote healthier food choices with positive outcomes, particularly for younger residents.
- 30.10 The main potential negative health impacts relate to construction-phase noise, dust, and disruption. These effects could have a greater impact on vulnerable groups, including disabled people, those with respiratory conditions, and older people (disability and age being protected characteristics).
- 30.11 These impacts would be temporary and can be minimised and managed through a Construction Management Plan (CMP), including noise and dust control measures and careful scheduling of works. A Construction Working Group, involving local community representatives, is also recommended to ensure robust engagement and communication with the local community, which could include representation from vulnerable groups. **The CMP and Construction Working Group would be secured by shadow s106 agreement.**

### **Conclusion**

- 30.12 The proposal is expected to have an overall positive impact on health and wellbeing. Whilst there are existing pressures on local primary healthcare, the services should be able to absorb the additional demand, and the

scheme takes a preventative approach which will minimise demand. It delivers high-quality affordable housing, improved access to open space and active travel routes, and inclusive and safe public spaces.

- 30.13 Although construction impacts will need careful management, these can be mitigated through the CMP and ongoing engagement.
- 30.14 The proposal is likely to have an overall positive impact on health and wellbeing, with clear benefits for those most affected by health inequalities. As such, it complies with the objectives of the development, particularly in relation to CLP policy C1, and will contribute positively to Camden's ambitions to reduce health inequalities and support healthier, more inclusive communities.

## **31. PLANNING OBLIGATIONS**

### ***Obligations (Heads of Terms)***

- 31.1 The following planning obligations (including financial contributions) are required to mitigate the impact of the development. These heads of terms will mitigate any impact of the proposal on the infrastructure of the area. They will be secured through a shadow s106 agreement as the Council is the applicant and the landowner.
- 31.2 For the purposes of the final decision notice, each of these Heads of terms will be included in a "shadow s106 condition". The conditions, normally, marked with \*\*, would cover the heads of terms to be incorporated into a Section 106 Agreement if the council disposes of the land in the future. The final wording for these shadow s106 conditions is not included in the conditions list at the end of this report and will be added prior to issuing a final decision, but they will incorporate the following.

### ***Affordable Housing***

- 119 homes on Site A
- 100% social rent tenure on Site A
- Agent of change

### ***Affordable Workspace***

- Minimum 2,119sqm of affordable workspace
- Minimum discount of 40% on market rate for 10 years
- Workspace strategy completed by affordable workspace provider

### ***Design***

- Retention of project architect (Fielden Clegg Bradley Studios)

### ***Public Realm and Landscaping***

- Public open space contribution of £TBC

- Landscaping and public realm delivery plan
- Feasibility and implementation strategy for public realm improvements to the railway underpass and arches
- Public space and public realm management and maintenance plan

### ***Energy and Sustainability***

- Total carbon reductions of minimum 66.8%
- Green stage reductions of minimum 64.4%
- Lean stage reductions of minimum 6.4%
- Be lean stage energy monitoring and reporting
- Carbon offset payment of £171,336
- BREEAM certification (minimum 'excellent') for non-residential
- BREEAM certification (minimum 3.5 stars) for residential
- BREEAM credits to be maximised
- Safeguarded connection to future district heating network

### ***Transport***

- Car free development
- Travel plan
- Travel plan monitoring and measures contribution of £11,384
- Local CPZ review contribution of £15,000
- Electric vehicle fast-charging infrastructure contribution of £20,000
- Micro and shared mobility improvements contribution of £10,000
- Delivery and servicing plan
- Demolition management plan (DMP)
- Construction management plan (CMP)
- DMP/CMP implementation support contribution of £30,513
- DMP/CMP impact bond of £32,000
- Construction working group consisting of representatives from the local community
- Highway works contribution of £TBC
- Pedestrian, Cycling, and Environmental (PCE) contribution £TBC
- Designs for land interface between Site A and Agar Grove Estate
- Designs for cycle/pedestrian route in consultation with TfL
- Parking management plan (including management of parking in tandem with Agar Grove Estate and with ambition to remove parking spaces on northern open site within Site A)

### ***Employment and training***

- Employment and training plan
- Apprenticeships provided through the King's Cross CSC
- Apprenticeships support contribution of £37,400
- Construction apprenticeship management plan
- Number of end use apprenticeships TBC

- Number of work experience placements TBC
- Local employment – 20% construction jobs recruited locally
- Local procurement – 20% procurement from local organisations
- Social value charter for future tenants and commercial occupiers
- Ongoing engagement with the Inclusive Business Network, Good Work Camden and Council's Inclusive Economy Service
- Camden STEAM and Good Work Camden commitments

## **32. COMMUNITY INFRASTRUCTURE LEVY (CIL)**

- 32.1 The CIL applies to all proposals which add 100m<sup>2</sup> of new floorspace or an extra dwelling. The amount to pay is the increase in floorspace (m<sup>2</sup>) multiplied by the rate in the CIL charging schedule. Camden collects two types of Community Infrastructure Levy: Mayoral CIL and Camden CIL.

### ***Mayoral CIL***

- 32.2 The proposal will be liable for the Mayor of London's Community Infrastructure Levy (CIL). This would be collected by Camden after the scheme is implemented and could be subject to surcharges for failure to assume liability, submit a commencement notice and late payment, and subject to indexation in line with the construction costs index.

- 32.3 The amount is estimated at **£188,972** and this is based on the submitted plans and provision of a light industrial end use (the maker space) (and as such final CIL figures may differ than those stated below). Final amounts will be stated in the relevant CIL Demand Notices provided at commencement stage of each part of the development, as appropriate.

### ***Camden CIL***

- 32.4 The proposal would also be liable for the Camden Community Infrastructure Levy (CIL). The amount is estimated at £nil based on the plans and provision of a light industrial end use. The CIL is zero because there is existing floor space on site that is discounted from the calculations and affordable housing has a nil CIL charge.

## **33. CONCLUSION**

- 33.1 The proposed development would make the best use of the brownfield land by achieving optimised and higher density mixed use development including home in accordance with the NPPF and the ambitions of the emerging site allocation S5 of the Draft Local Plan which envisages significant transformation of the mix of uses and character of the site.
- 33.2 The development would provide 119 affordable housing units as 100% social rented accommodation which would make a significant contribution towards the Council's housing targets and in alleviating the demand for Council

housing. The loss of the existing industrial floorspace and the displacement of those businesses which is contrary to policy has been carefully considered. The loss is accepted on the basis that the existing uses would be difficult to incorporate into a mixed-use scheme and that might hinder housing delivery. Furthermore, the scheme includes a replacement commercial offer which provides more floorspace all of which would all be provided as affordable creative maker space for a period of 10 years and ultimately more jobs. On balance, it is considered that the proposal does comply with the land use policies of the development when taken as a whole. The new homes would be of a high quality, providing occupiers with a good standard of living, and with energy demand minimised.

- 33.3 The proposed design of the development is well conceived, the use of a podium and non-residential uses at ground floor will create an active frontage to the site and the 3 upper floor blocks of varying height break down the massing to ensure it sits comfortable in its context.
- 33.4 Officers have identified some less than substantial harm to heritage assets, at between the medium and very low end of the scale if the development proposals on both Site A and Site B are completed. However, for Site A only the harm would be less than substantial at the lower end of the scale only, with this impact being to the Camden Square Conservation Area. This harm is given considerable weight and importance in the decision-making process. The level and nature of the harm has been carefully considered given the context at this site where development is expected to come forward with an increased density, as indicated by the emerging site allocation, and which would secure social, environmental and economic benefits including new social housing, affordable workspace and an improved public realm including a new public square.
- 33.5 The height and scale of the scheme means there would be significant impacts to some existing and future residents nearby from loss of light however these impacts would be limited to a small number of properties and are considered acceptable given the wider benefits this application would provide both economically and in terms of new housing and affordable workspace and taking account of the flexibility decision makers are asked to give to light impacts by the NPPF. There are no other significant amenity impacts on neighbouring residents, indeed there are benefits that are likely to be derived from the change in uses on the site away from general industry and improved public realm and activation which will improve safety and security, particularly to groups who are affected more by fear of crime (sex, race and age all being protected characteristics).
- 33.6 The development would be car free, except for disabled parking, with good quality cycle parking provided within the new buildings and the public realm. A significant benefit of the scheme is the improvement of the cycle path on



the western side of the site. Considerable financial contributions would secure improvements to the transport, pedestrian and cycling environment in the local area, mitigating impact on local transport infrastructure. The impact from demolition and construction would be carefully managed throughout the development through a CMP and with continuous engagement secured via a CWG.

- 33.7 Officers consider that there are significant and compelling public benefits, including the provision of new affordable housing and affordable workspace, energy-efficient high-quality homes, urban renewal providing high-quality public realm, and improved safety and security in the local area, that would outweigh any harm associated with the scheme. It is considered that the proposed development complies with the development plan as a whole.

#### **34. RECOMMENDATION**

- 34.1 Grant conditional Full Planning Permission subject to a Shadow s106 Agreement.

#### **35. LEGAL COMMENTS**

- 35.1 Members are referred to the note from the Legal Division at the start of the Agenda.

**36. DRAFT CONDITIONS (SUBJECT TO GLA STAGE 2)**

1.	<p>Implementation</p> <p>The development hereby permitted must be begun not later than the end of three years from the date of this permission.</p> <p>Reason: In order to comply with the provisions of Section 91 of the Town and Country Planning Act 1990 (as amended)</p>
2.	<p>Approved drawings</p> <p>The development hereby permitted shall be carried out in accordance with the following approved drawings and supporting documents:</p> <p>SITE A EXISTING</p> <p>CAM-FCB-AX-XX-DR-A-05001 Site A - Site Location Plan - Existing 1:1250 A1 P01 26/09/2025</p> <p>CAM-FCB-AX-00-DR-A-05100 Site A - Ground Floor Plan - Existing 1:250 A1 P01 26/09/2025</p> <p>CAM-FCB-AX-XX-DR-A-05180 Site A - Demolition Plan 1:250 A1 P01 26/09/2025</p> <p>CAM-FCB-AX-XX-DR-A-05401 Site A - West Elevation - Existing 1:250 A1 P01 26/09/2025</p> <p>CAM-FCB-AX-XX-DR-A-05402 Site A - East Elevation - Existing 1:250 A1 P01 26/09/2025</p> <p>CAM-FCB-AX-XX-DR-A-05403 Site A - North Elevation - Existing 1:250 A1 P01 26/09/2025</p> <p>CAM-FCB-AX-XX-DR-A-05404 Site A - South Elevation - Existing 1:250 A1 P01 26/09/2025</p> <p>CAM-FCB-AX-XX-DR-A-05501 Site A - Section AA - Existing 1:250 A1 P01 26/09/2025</p> <p>CAM-FCB-AX-XX-DR-A-05502 Site A - Section BB - Existing 1:250 A1 P01 26/09/2025</p> <p>CAM-FCB-AX-XX-DR-A-05503 Site A - Section CC - Existing 1:250 A1 P01 26/09/2025</p> <p>CAM-FCB-AX-XX-DR-A-05504 Site A - Section DD - Existing 1:250 A1 P01 26/09/2025</p> <p>CAM-FCB-AX-XX-DR-A-05505 Site A - Section EE - Existing 1:250 A1 P01 26/09/2025</p> <p>CAM-FCB-AX-XX-DR-A-05506 Site A - Section FF - Existing 1:250 A1 P01 26/09/2025</p> <p>SITE A PROPOSED</p> <p>CAM-FCB-AX-00-DR-A-06099 Site A - Lower Ground Floor Plan - Proposed 1:250 A1 P01 26/09/2025</p> <p>CAM-FCB-AX-00-DR-A-06100 Site A -Upper Ground Floor Plan - Proposed 1:250 A1 P01 26/09/2025</p> <p>CAM-FCB-AX-01-DR-A-06101 Site A - 1st Floor Plan - Proposed 1:250 A1 P01 26/09/2025</p>

	CAM-FCB-AX-02-DR-A-06102 Site A - 2nd Floor Plan - Proposed 1:250 A1 P01 26/09/2025
	CAM-FCB-AX-03-DR-A-06103 Site A - 3rd Floor Plan - Proposed 1:250 A1 P01 26/09/2025
	CAM-FCB-AX-04-DR-A-06104 Site A - 4th Floor Plan - Proposed 1:250 A1 P01 26/09/2025
	CAM-FCB-AX-05-DR-A-06105 Site A - 5th Floor Plan - Proposed 1:250 A1 P01 26/09/2025
	CAM-FCB-AX-06-DR-A-06106 Site A - 6th Floor Plan - Proposed 1:250 A1 P01 26/09/2025
	CAM-FCB-AX-07-DR-A-06107 Site A - 7th Floor Plan - Proposed 1:250 A1 P01 26/09/2025
	CAM-FCB-AX-08-DR-A-06108 Site A - 8th Floor Plan - Proposed 1:250 A1 P01 26/09/2025
	CAM-FCB-AX-09-DR-A-06109 Site A - 9th Floor Plan - Proposed 1:250 A1 P01 26/09/2025
	CAM-FCB-AX-10-DR-A-06110 Site A - 10th -13th Floor Plan - Proposed 1:250 A1 P01 26/09/2025
	CAM-FCB-AX-R1-DR-A-06114 Site A - Roof Level - Proposed 1:250 A1 P01 26/09/2025
	CAM-FCB-AX-R2-DR-A-06115 Site A - Roof Plan - Proposed 1:250 A1 P01 26/09/2025
	CAM-FCB-AX-XX-DR-A-06201 Site A - West Elevation - Proposed 1:250 A1 P01 26/09/2025
	CAM-FCB-AX-XX-DR-A-06202 Site A - South Elevation - Proposed 1:250 A1 P01 26/09/2025
	CAM-FCB-AX-XX-DR-A-06203 Site A - East Elevation - Proposed 1:250 A1 P01 26/09/2025
	CAM-FCB-AX-XX-DR-A-06204 Site A - North Elevation - Proposed 1:250 A1 P01 26/09/2025
	CAM-FCB-AX-XX-DR-A-06205 Site A - Podium Elevations - Proposed 1:250 A1 P01 26/09/2025
	CAM-FCB-AX-XX-DR-A-06301 Site A - Section AA - Proposed 1:250 A1 P01 26/09/2025
	CAM-FCB-AX-XX-DR-A-06302 Site A - Section BB - Proposed 1:250 A1 P01 26/09/2025
	CAM-FCB-AX-XX-DR-A-06303 Site A - Section CC - Proposed 1:250 A1 P01 26/09/2025
	CAM-FCB-AX-XX-DR-A-06304 Site A - Section DD - Proposed 1:250 A1 P01 26/09/2025
	CAM-FCB-AX-XX-DR-A-06305 Site A - Section EE - Proposed 1:250 A1 P01 26/09/2025
	CAM-FCB-AX-XX-DR-A-06306 Site A - Section FF - Proposed 1:250 A1 P01 26/09/2025
	CAM-FCB-AX-ZZ-DR-A-06401 Site A - Unit Type Plan - Flat - 1B2P 1:50 A1 P01 26/09/2025
	CAM-FCB-AX-ZZ-DR-A-06402 Site A - Unit Type Plan - Flat - 2B4P 1:50 A1 P01 26/09/2025

	<p>CAM-FCB-AX-ZZ-DR-A-06403 Site A - Unit Type Plan - Flat - 2B4P 1:50 A1 P01 26/09/2025</p> <p>CAM-FCB-AX-ZZ-DR-A-06404 Site A - Unit Type Plan - Flat - 2B3P M4(3) 1:50 A1 P01 26/09/2025</p> <p>CAM-FCB-AX-ZZ-DR-A-06405 Site A - Unit Type Plan - Flat - 2B3P M4(3) 1:50 A1 P01 26/09/2025</p> <p>CAM-FCB-AX-ZZ-DR-A-06406 Site A - Unit Type Plan - Flat - 3B4P M4(3) 1:50 A1 P01 26/09/2025</p> <p>CAM-FCB-AX-ZZ-DR-A-06407 Site A - Unit Type Plan - Flat - 3B5P 1:50 A1 P01 26/09/2025</p> <p>CAM-FCB-AX-ZZ-DR-A-06408 Site A - Unit Type Plan - Mais- 3B5P - M4(3) 1:50 A1 P01 26/09/2025</p> <p>CAM-FCB-AX-ZZ-DR-A-06409 Site A - Unit Type Plan - Mais - 2B4P</p> <p>CAM-FCB-AX-ZZ-DR-A-06410 Site A - Unit Type Plan - Mais - 2B4P</p> <p>CAM-FCB-AX-ZZ-DR-A-06411 Site A - Unit Type Plan - Mais - 2B4P</p> <p>CAM-FCB-AX-ZZ-DR-A-06412 Site A - Unit Type Plan - Mais - 3B5P</p> <p>CAM-FCB-AX-ZZ-DR-A-06413 Site A - Unit Type Plan - Mais - 4B6P</p> <p>CAM-FCB-AX-ZZ-DR-A-06501 Bay Study - Typical 3B Maisonette - West</p> <p>CAM-FCB-AX-ZZ-DR-A-06502 Bay Study - Typical 3B Maisonette - East</p> <p>CAM-FCB-AX-ZZ-DR-A-06503 Bay Study - Podium Elevation</p> <p>CAM-FCB-AX-ZZ-DR-A-06504 Bay Study - Block A2 Entrance</p> <p>CAM-FCB-AX-ZZ-DR-A-06510 Bay Study - A3 Typical 2B - West</p> <p>CAM-FCB-AX-ZZ-DR-A-06511 Bay Study - A3 Typical 2B - South</p> <p>CAM-FCB-AX-ZZ-DR-A-06512 Bay Study - A3 Entrance Colonade</p> <p>SCHEDULES</p> <p>CAM-FCB-SW-XX-SH-A-00001 Site Wide Planning Area Schedule</p> <p>LANDSCAPING</p> <p>CAM-SPA-AX-00-DR-L-94201</p> <p>CAM-SPA-AX-01-DR-L-94201</p> <p>CAM-SPA-AX-RL-DR-L-94201</p> <p>CAM-SPA-AX-ZZ-DR-L-94201</p> <p>Reason: For the avoidance of doubt and in the interest of proper planning.</p>
3.	<p>Detailed drawings</p> <p>Detailed drawings, or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the local planning authority before the relevant part of the work is begun:</p> <p>A) Detailed drawings, including plans, coloured elevations and sections at 1:20 of all arched openings. To include any ventilation grills, balustrades/ guardrails, parapets, gates, planters and associated elements and lighting fixtures;</p>

	<p> B) Detailed drawings, including plans, coloured elevation and section drawings, of the windows at a scale of 1:20 showing the depth and materiality of window reveals  C) Technical drawings of transition points between the brick body and precast concrete elements  D) No brickwork shall be laid until a sample panel has been prepared on-site showing the proposed mortar mix, tonality, and joint profile.  E) No brickwork shall be laid until sample panels (minimum 1m x 1m in size) have been prepared on-site showing the proposed textured panel, crown bay, stretcher bond and stack bond facing brickwork. The bond must be maintained consistently throughout the development, including around corners and openings. Any ends of walls or openings must be cut neatly and symmetrically to maintain the visual integrity of the bond.  F) Detailed drawings of gates, railings, doors and louvres on all parts of buildings which face the public realm at a scale of 1:20.  G) Physical samples of all external metal materials, including coating swatches shall be made available for the inspection and written approval of the Local Planning Authority prior to the commencement of the relevant part of the works. The samples shall be arranged to demonstrate the interplay of textures and tonalities between the brickwork and metalwork.  H) Physical samples of precast concrete panels, showing materiality, tonality and grain; viewed as a companion material to the brickwork.  I) Detailed drawings of supporting signage at 1:20. </p> <p>The development shall be thereafter built in accordance with the approved details.</p> <p>To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policies D1 and D2 of the Camden Local Plan 2017.</p>
4.	<p>Materials samples</p> <p>Notwithstanding any indication given on the approved plans, prior to the first commencement of above ground works for the relevant building of development hereby permitted, samples and a schedule of the materials to be used in the external elevations shall be submitted to and approved in writing by the local planning authority. 1:1 mock-up sample panels for each building shall be made available for assessment on-site, showing all cladding panels, key junctions and colour tonality.</p> <p>The development hereby permitted shall be thereafter built in accordance with the approved details.</p>



	Reason: To ensure that the external appearance of the building is satisfactory in accordance with policy D1 of the Camden Local Plan 2017.
5.	<p>External fixtures</p> <p>No lights, meter boxes, flues, vents or pipes, and no telecommunications equipment, alarm boxes, television aerials, satellite dishes or rooftop 'mansafe' rails shall be fixed or installed on the external face of the buildings unless details (including appropriate scale drawings) have been first submitted to and approved in writing by the Local Planning Authority. Any external fixtures hereby permitted shall be installed in precise accordance with the approved details.</p> <p>Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policies D1 and D2 of the Camden Local Plan 2017.</p>
6.	<p>Secure by design</p> <p>(a) Prior to above ground construction works evidence that the plans can achieve secured by design accreditation must be submitted to and approved in writing (in consultation with the Designing Out Crime Officer) by the Local Planning Authority.</p> <p>(b) Prior to first occupation evidence that the buildings will achieve secured by design accreditation to Silver award must be submitted to and approved in writing by the Local Planning Authority.</p> <p>Once approved the details shall be implemented in full and retained for perpetuity, unless otherwise agreed in writing by the local planning authority.</p> <p>Reason: To ensure the development minimises the opportunities for crime and anti-social behaviour and ensures community safety in accordance with policy D1 and C5 of the Camden Local Plan 2017 and policy and D11 of the London Plan 2021.</p>
7.	<p>Use class restrictions</p> <p>Notwithstanding the provisions of the Town and Country Planning (Use Classes) Order 1987 or the Town and Country Planning (General Permitted Development) Order 2015 (or any orders revoking and re-enacting those orders with or without modification), the non-residential areas of the site shall only be used for activities within Class E(g) and for no other purposes whatsoever unless first agreed in writing in advance by the local planning authority.</p> <p>Reason: To safeguard the amenity of the residential use, adjoining premises, and the area generally in accordance with policies A1 and A4 of the Camden Local Plan 2017.</p>
8.	Hours of use

	<p>No occupation of the non-residential buildings shall take place until a schedule of opening hours for the proposed activities has been submitted to and approved in writing by the Local Planning Authority. The development shall thereafter operate only within the approved hours.</p> <p>Reason: To safeguard the amenity of the adjoining premises and the area generally in accordance with policies A1 and A4 of the London Borough of Camden Local Plan 2017.</p>
9.	<p><b>Mechanical ventilation</b></p> <p>Prior to commencement of development (excluding demolition to the existing slab level and site preparation works) on site, full details of the mechanical ventilation including air inlet locations and filters shall be submitted to and approved by the local planning authority in writing. Air inlet locations should be located away from busy roads, diesel-powered railway traffic, generator flues and other relevant sources of emissions and shall be as close to roof level as possible, to protect internal air quality. The development shall thereafter be constructed and maintained in accordance with the approved details.</p> <p>Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies TC1, A1 and A4 of the Camden Local Plan 2017.</p>
10.	<p><b>NO2 filtration</b></p> <p>Prior to occupation, evidence that an appropriate NO2 filtration system on the mechanical ventilation intake has been installed and a detailed mechanism to secure maintenance of this system should be submitted to the Local Planning Authority and approved in writing. Thereafter the NO2 filtration system shall be maintained and operated in accordance with the approved details.</p> <p>Reason: To safeguard the amenities of the prospective occupiers, adjoining premises and the area generally in accordance with the requirements of policies A1, CC1, CC2 and CC3 of the Camden Local Plan 2017.</p>
11.	<p><b>Air quality</b></p> <p>At least 3 months prior to the commencement of any development on site the following shall be submitted and approved by the Local Planning Authority 1) an air quality assessment report, written in accordance with the relevant current guidance. The development must be at least "Air Quality Neutral" and an air quality neutral assessment for both buildings and transport shall be included in the report. The assessment shall assess the current baseline situation in the vicinity of the proposed development. The report shall include all calculations and baseline data and be set out so that the Local Planning Authority can fully audit the report and critically analyse the content and recommendations. The report should include an assessment of the construction dust risk and appropriate mitigation proposed and implemented,</p>

	<p>and 2) An Air Quality positive assessment, with a scheme for air pollution design solutions or mitigation measures if required based on the findings of the report. This shall include mitigation for when air quality neutral transport and building assessments do not meet the benchmarks. The development shall be constructed in accordance with the details and mitigation details and maintained thereafter.</p> <p>Reason: To protect the amenity of residents in accordance with Camden Local Plan Policy CC4 and London Plan policy SI 1.</p>
12.	<p><b>Back-up generators</b></p> <p>Prior to the commencement of above ground works for any relevant part of the development details of the proposed Emergency Diesel Generator Plant (or any alternative means of back-up power generation, if feasible) and any associated abatement technologies including make, model and emission details shall have been submitted to and approved by the Local Planning Authority in writing. Generators should be appropriately sized for life saving functions only, alternatives to diesel fully considered and testing minimised. The flue/exhaust from the generator should be located away from air inlet locations. The generator shall thereafter be installed in accordance with the approved details. The maintenance and cleaning of the systems shall be undertaken regularly in accordance with manufacturer specifications and details of emission certificates by an accredited MCERTS organisation shall be provided following installation and thereafter every three years to verify compliance with regulations made by the Secretary of State.</p> <p>Reason: To safeguard the amenity of occupants, adjoining premises and the area generally in accordance with policy A1 and CC4 of the Camden Local Plan 2017, and policy GG3 and SI1 of the London Plan 2021.</p>
13.	<p><b>Monitoring railway emissions</b></p> <p>Prior to commencement of above ground works automatic real-time NO2 and PM air quality monitoring of site A at the closet point to the rail lines should be undertaken for a baseline monitoring period to establish the impact of rail on the future occupants. If air pollution exceeds the National Air Quality Objective levels for the proposed uses no above ground works shall take place until details of additional mitigation have been submitted to and approved by the Local Planning Authority in writing. The approved additional mitigation must then be must be implemented prior to occupation, retained and maintained thereafter.</p>

	Reason: To protect the amenity of residents in accordance with London Borough of Camden Local Plan Policy CC4 and London Plan policy SI 1.
14.	<p>AQ monitoring</p> <p>No development shall take place until real time dust monitors appropriate to the dust risk have been installed: prior to installing monitors, full details of the air quality monitors have been submitted to and approved by the local planning authority in writing. Such details shall include the location, number and specification of the monitors, including evidence of the fact that they will be installed in line with guidance outlined in the GLA's Control of Dust and Emissions during Construction and Demolition Supplementary Planning Guidance; a confirmation email should be sent to <a href="mailto:airquality@camden.gov.uk">airquality@camden.gov.uk</a> no later than one day after the monitors have been installed with photographic evidence in line with the approved details. prior to commencement, a baseline monitoring report including evidence that the monitors have been in place and recording valid air quality data for at least 3 months prior to the proposed implementation date shall be submitted to the Local Planning Authority and approved in writing. The monitors shall be retained and maintained on site in the locations agreed with the local planning authority for the duration of the development works, monthly summary reports and automatic notification of any exceedances provided in accordance with the details thus approved. Any changes to the monitoring arrangements must be submitted to the Local Planning Authority and approved in writing.</p> <p>Reason: To safeguard the amenity of adjoining premises and the area generally in accordance with the requirements of policies A1 and CC4 of the London Borough of Camden Local Plan Policies.</p>
15.	<p>Waste storage and removal</p> <p>At least six months prior to completion, details of the location, design and method of waste storage and removal including recycled materials, shall be submitted to and approved by the local planning authority in writing. The facility as approved shall be provided prior to the first occupation of any of the new units and permanently retained thereafter.</p> <p>Reason: To ensure that sufficient provision for the storage and collection of waste has been made in accordance with the requirements of policies A1 and CC5 of the Camden Local Plan 2017.</p>
16.	<p>Delivery and refuse management</p> <p>All refuse and recycling bins, delivery cages, trolleys and any other items linked to deliveries and collection in association with the development hereby permitted are to be stored within the buildings and only brought out onto the public highway when deliveries are being made or refuse collected and returned to within the building immediately thereafter.</p>

	Reason: In the interests of visual amenity and to prevent obstruction and inconvenience to users of the public highways, in accordance with policies A1, CC5 and T1 of the Camden Local Plan 2017.
17.	<p>Fire safety</p> <p>The development must be implemented in accordance with the provisions of the London Plan Fire Statement dated 07/08/2025 (Revision R01) and the Planning Gateway One Fire Statement (Revision R01), both dated 07/08/2025 both produced by OFR.</p> <p>Reason: To ensure the development provides for the safety of all building users and the highest standards of fire safety in accordance with Policy D5 and D12 of the London Plan.</p>
18.	<p>Fire appliance access</p> <p>Prior to the commencement of development, the Fire Appliances Access Arrangements for occupied buildings on or around the site shall be submitted to and approved in writing by the Local Planning Authority. The Fire Vehicle Access Arrangements shall demonstrate how provision will be made within and around the masterplan site to enable fire appliances to gain access to any occupied buildings during construction. The Fire Appliances Access Arrangements document shall be reviewed and updated to include each building constructed through this permission prior to its occupation, and prior to first commencing development on a plot or phase of part of the masterplan site. The development and any interim access arrangements during construction shall be carried out and provided for in accordance with the approved details.</p> <p>Reason: To ensure the development, both during construction and as completed, provides appropriate access for fire appliances, the safety of all building users and the highest standards of fire safety in accordance with Policy D5 and D12 of the London Plan.</p>

19.	<p>Cycle parking</p> <p>Prior to commencement of above ground works for each block details of long and short stay bicycle parking including details of electric bike parking shall be submitted and approved by the Local Planning Authority. . Thereafter the development should be completed in accordance with the approved detailed and maintained and retained as such.</p> <p>Reason: To ensure that the scheme makes adequate provision for cycle users in accordance with Camden Local Plan policies T1 and T2, the London Plan policy T5, CPG Transport and the Mayoral Design Guidance in force at the time of the condition discharge.</p>
20.	<p>Piling Method Statement</p> <p>No piling shall take place until a Piling Method Statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage and water infrastructure, and the programme for the works) and piling layout plan including all Thames Water wastewater and clean water assets, the local topography and clearance between the face of the pile to the face of a pipe or sewer has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement and piling layout plan.</p> <p>Reason: To ensure the water infrastructure and network are protected and protected from damage, preventing flooding or pollution, in accordance with policy CC3 of the London Borough of Camden Local Plan.</p>
21.	<p>Non-road mobile machinery</p> <p>All non-road mobile machinery (any mobile machine, item of transportable industrial equipment, or vehicle - with or without bodywork) of net power between 37kW and 560kW used on the site for the entirety of the demolition and phases of the development hereby approved shall be required to meet Stage IIIA of EU Directive 97/68/EC. The site shall be registered on the NRMM register for the demolition and construction phases of the development.</p> <p>No non-road mobile machinery (NRMM) shall be used on the site unless it is compliant with the NRMM Low Emission Zone requirements (or any superseding requirements) and until it has been registered for use on the site on the NRMM register (or any superseding register).</p> <p>Reason: To safeguard the amenities of the adjoining occupiers, the area generally and contribution of developments to the air quality of the borough in accordance with the requirements of policies CC1, CC2 and CC4 of the Camden Local Plan 2017, and policy GG3 and SI1 of the London Plan 2021.</p>



22.	<p data-bbox="357 197 715 230">Biodiversity enhancements</p> <p data-bbox="357 271 1382 521">Prior to the completion of the superstructure for each block, details of biodiversity enhancements incorporating the recommendations from the Preliminary Ecological Appraisal (and including specific details of locations of bird/bat boxes and insect hotels) shall be submitted to and approved in writing by the local planning authority. The measures shall be installed in accordance with the approved plans prior to the occupation of the development and thereafter retained.</p> <p data-bbox="357 562 1326 707">Reason: In order to secure appropriate features to conserve and enhance wildlife habitats and biodiversity measures within the development, in accordance with the requirements of policy A3 of the Camden Local Plan 2017.</p>
23.	<p data-bbox="357 745 639 779">Biodiversity gain plan</p> <p data-bbox="357 819 1386 965">Prior to the commencement of development a biodiversity gain plan shall be submitted to and approved by the Local Planning Authority. The biodiversity gain plan shall be prepared in accordance with the preliminary ecological appraisal and draft biodiversity metric (unless otherwise agreed first in writing).</p> <p data-bbox="357 1005 1386 1111">Reason: In order to protect and enhance biodiversity in accordance with Policy A3 of the Camden Local Plan 2017 and in order to ensure that biodiversity net gain is achieved.</p>

24.	<p><b>Habitat Management and Monitoring Plan</b></p> <p>Prior to the commencement of development a Habitat Management and Monitoring Plan (HMMP), prepared in accordance with the Biodiversity Gain Plan, shall be submitted to and approved by the Local Planning Authority. The HMMP shall include:(a) a non-technical summary;(b) the roles and responsibilities of the people or organisation(s) delivering the HMMP; (c) the planned habitat creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the approved Biodiversity Gain Plan; (d) the management measures to maintain habitat in accordance with the approved Biodiversity Gain Plan for a period of 30 years from the completion of development; and(e) the monitoring methodology and frequency in respect of the created or enhanced habitat to be submitted to the Local Planning Authority.</p> <p>Reason: In order to protect and enhance biodiversity in accordance with Policy A3 of the Camden Local Plan 2017 and in order to ensure that biodiversity net gain is achieved.</p>
25.	<p><b>Completion of biodiversity enhancements</b></p> <p>Prior to the first occupation of the buildings (a) the habitat creation and enhancement works set out in the approved HMMP must be completed; and (b) a completion report, evidencing the completed habitat enhancements, has been submitted to, and approved in writing by the Local Planning Authority.</p> <p>Reason: In order to protect and enhance biodiversity in accordance with Policy A3 of the Camden Local Plan 2017 and in order to ensure that biodiversity net gain is achieved.</p>
26.	<p><b>Breeding bird protection</b></p> <p>No demolition or any site clearance must take place outside the breeding bird season (i.e. it should be undertaken in the period September to January inclusive). Should it prove necessary to undertake demolition or clearance works during the bird nesting season, then a pre-works check for nesting birds should be undertaken by a qualified ecologist. If any active nests are found, works should cease and an appropriate buffer zone should be established (the qualified ecologist would advise). This buffer zone should be left intact until it has been confirmed that the young have fledged and the nest is no longer in use.</p> <p>Reason: In order to ensure the development safeguards protected and priority species in accordance with policy A3 of the Camden Local Plan 2017.</p>
27.	<p><b>Network rail boundary</b></p> <p>Prior to first occupation of the development site landscaping measures including details of all boundary and perimeter treatments, taking account of Network Rail's concerns regarding the safety, security and operation of the</p>

	<p>railway infrastructure, shall be submitted to the Local Planning Authority for its written approval in consultation with Network Rail. This must include details of suitable anti-trespass fencing to be installed where necessary along the boundary between the proposed development and the railway. Evidence shall be provided with the submission showing how landscaping has taken account of Network Rail's concerns regarding the safety, security and operation of the railway infrastructure. Once agreed the details shall be provided on site in full prior to the occupation the development and maintained in perpetuity.</p> <p>Reason: To protect local transport infrastructure in accordance with policies T1 and T4 of the Camden Local Plan 2017.</p>
28.	<p>Solar panels</p> <p>Prior to commencement of above ground works, drawings and data sheets showing the location, extent (at least 331m<sup>2</sup>) and predicted energy generation of photovoltaic cells energy generation capacity (at least 88kWp) and associated equipment to be installed on the building shall have been submitted to and approved by the Local Planning Authority in writing. The measures shall include the installation of a meter to monitor the energy output from the approved renewable energy systems. A site-specific lifetime maintenance schedule for each system, including safe roof access arrangements, shall be provided. The cells shall be installed in full accordance with the details approved by the Local Planning Authority before occupation of the buildings and permanently retained and maintained thereafter.</p> <p>Reason: Reason: To ensure the development provides adequate on-site renewable energy facilities in accordance with the requirements of policy CC1 (Climate change mitigation) of the London Borough of Camden Local Plan 2017.</p>
29.	<p>SuDS and drainage: Final details</p> <p>Prior to commencement of development, full details of the sustainable drainage systems shall be submitted to and approved in writing by the Local Planning Authority. The details shall include at least 103m<sup>3</sup> roof storage in 1,085m<sup>2</sup> of blue /green roofs, 34m<sup>3</sup> of storage in 332m<sup>2</sup> of pervious pavements and 328m<sup>3</sup> of attenuation tanks. Such a system should be designed to accommodate all storms up to and including a 1:100 year storm with a 40% provision for climate change such that flooding does not occur in any part of a building or in any utility plant susceptible to water, or on any part of the entire development site for up to and including a 1:30 year storm. The details shall demonstrate a site run-off rate conforming to the greenfield run-off rate or other rate of 5.1 l/s approved by the Local Planning Authority. An up to date drainage statement, SuDS pro-forma, a lifetime maintenance plan and supporting evidence should be provided including:</p> <ul style="list-style-type: none"> <li>- The proposed SuDS or drainage measures including adequate storage capacities</li> <li>- The proposed surface water discharge rates or volumes</li> </ul>

	<p>Systems shall thereafter be retained and maintained in accordance with the approved details.</p> <p>Reason: To reduce the rate of surface water run-off from the buildings and limit the impact on the storm-water drainage system, and to ensure the development is safe, in accordance with policies CC2 and CC3 of the London Borough of Camden Local Plan Policies and Policy SI 13 of the London Plan 2021.</p>
30.	<p>SuDS: Evidence of installation</p> <p>Prior to occupation, evidence that the SuDS system has been implemented in accordance with the approved details shall be submitted to the Local Planning Authority and approved in writing. The systems shall thereafter be retained and maintained in accordance with the approved maintenance plan.</p> <p>Reason: To reduce the rate of surface water run-off from the buildings and limit the impact on the storm-water drainage system, and to ensure the development is safe, in accordance with policies CC2 and CC3 of the London Borough of Camden Local Plan Policies and Policy SI 13 of the London Plan 2021.</p>
31.	<p>Overheating risk</p> <p>Prior to the commencement of above ground works an overheating risk management plan shall be submitted to and approved by the local planning authority to ensure overheating of proposed residential units is minimised. Once agreed any measures shall be implemented on site prior to first occupation of the development. The ORMP shall be followed thereafter for the development in perpetuity.</p> <p>Reason: To ensure the development contributes to minimising the effects of and can adapt to a changing climate in accordance with policies CC1 and CC2 of the London Borough of Camden Local Plan Policies and Policy SI 2 of the London Plan.</p>
32.	<p>Further 'Be lean' reductions</p> <p>Prior to commencement of above-ground works a revised Be Lean assessment with supporting modelling and robust justification that further fabric measures have been considered with the aim of exceeding the 10% reduction in carbon dioxide emissions beyond Part L 2021 Building Regulations in line with the energy hierarchy shall be submitted to and approved by the Local Planning Authority. The development shall be implemented in accordance with the approved measures and prior to occupation, evidence demonstrating that the approved measures have been implemented shall be submitted and approved in writing by the Local Planning Authority.</p>

	<p>Reason: Reason: To ensure the development contributes to minimising the effects of and can adapt to a changing climate in accordance with policies CC1 and CC2 of the London Borough of Camden Local Plan Policies and Policy SI 2 of the London Plan.</p>
33.	<p>Water efficiency</p> <p>The development hereby approved shall achieve a maximum internal water use of 105litres/person/day allowing 5 litres/person/day for external water use. The dwellings shall not be occupied until the Building Regulation optional requirement has been complied with.</p> <p>Reason: To ensure the development contributes to minimising the need for further water infrastructure in an area of water stress in accordance with policies CC1, CC2 and CC3 of the Camden Local Plan 2017.</p>
34.	<p>Demolition waste</p> <p>The demolition hereby approved shall divert a minimum 95% of waste from landfill and comply with the Institute for Civil Engineer's Demolition Protocol and either reuse materials on-site or salvage appropriate materials to enable their reuse off-site. Prior to the commencement of above ground works, evidence demonstrating that this has been achieved shall be submitted to and approved in writing by the Local Planning Authority.</p> <p>Reason: To ensure the development contributes to reducing waste and supporting the circular economy in accordance with the requirements of Policy CC1 of the London Borough of Camden Local Plan 2017.</p>
35.	<p>Whole life carbon</p> <p>Prior to the any work on site, including all works of deconstruction and demolition, an updated version (update 1) of the Whole Life Carbon Assessment (WLCA) must be submitted to and approved in writing by the Local Planning Authority. After works of deconstruction and demolition, but prior to commencement of any construction works, an updated version (update 2) of the WLCA must be submitted to and approved in writing by the Local Planning Authority.</p> <p>WLCA update1 and 2 should be minimised where feasible. Where WLCA update1 and 2 identify changes to the design, procurement or delivery of the approved development will result in an increase in embodied carbon (A1-A5) above 569kgCO<sub>2</sub>e/m<sup>2</sup> and/or Whole Life Carbon (A1-C4) above 820kgCO<sub>2</sub>e/m<sup>2</sup>, which are the benchmarks established by your application stage WLCA, you must identify measures that will ensure that the additional carbon footprint of the development will be minimised.</p> <p>Works shall be carried out in accordance with the updated versions of the Whole Life Carbon Assessment approved.</p>

	<p>Reason: To ensure the development minimises carbon emissions throughout its whole life cycle and optimises resource efficiency in accordance with Policy SI2 in the London Plan 2021 and Policy CC1 of the Camden Local Plan.</p>
36.	<p>Whole life carbon – post-construction</p> <p>Prior to the first occupation of the development the post-construction tab of the GLA's Whole Life-Cycle Carbon Assessment template should be completed in line with the GLA's Whole Life-Cycle Carbon Assessment Guidance. The post-construction assessment should be submitted to ZeroCarbonPlanning@london.gov.uk and SustainabilityPlanning@camden.gov.uk, along with any supporting evidence as per the guidance.</p> <p>Reason: Reason: In the interests of sustainable development and to maximise onsite carbon dioxide savings in accordance with Camden Local Plan policies CC1, CC2, CC3, and CC4, and London Plan policies, SI1, SI2, SI3, SI4, SI5 and SI7.</p>
37.	<p>Circular Economy (Waste)</p> <p>Prior to occupation, the likely destination of all waste streams and confirmation that the destination landfill has capacity in respect of the waste from that plot shall be submitted to and approved by the Local Planning Authority (in consultation with the GLA).</p> <p>Reason: Reason: To encourage waste reduction and the sustainable management of waste in accordance with policies CC5 of the Camden Local Plan 2017 and Policy SI 7 of the London Plan 2021.</p>
38.	<p>Economy Statement: Delivered in accordance with details</p> <p>The construction and demolition waste plan/ Circular Economy Statement as approved (gla_circular_economy_statements_template 120-136 Camley Street Revised, 120-136 Camley Street Circular Economy Statement rev 2 by Temple Sept 2025, Circular Economy Statement Addendum Ramboll 16/12/25) shall be delivered to achieve at least 95% reuse/recycling/recovery of construction and demolition waste and 95% beneficial use of excavation waste. A minimum of 20% of the total value of materials should derive from recycled and reused content.</p> <p>Reason: To ensure all development optimise resource efficiency in accordance with policy CC1 of the London Borough of Camden Local Plan Policies and to reduce waste and support the circular economy in accordance with policy SI 7 of the new London Plan.</p>

39.	<p>Circular Economy (post-completion report)</p> <p>Prior to occupation, a Circular Economy post completion report for that plot shall be submitted to and approved (in consultation with the GLA) in writing by the Local Planning Authority.</p> <p>Reason: Reason: To encourage waste reduction and the sustainable management of waste in accordance with policies CC5 of the Camden Local Plan 2017 and Policy SI 7 of the London Plan 2021.</p>
40.	<p>Waste storage</p> <p>Waste stores for each building and use shall be provided in accordance with the approved delivery and servicing strategy prior to the first occupation of each building/use. Once installed the waste stores shall be retained and maintained in a good condition and in accordance with the strategy in perpetuity.</p> <p>Reason: To ensure suitable provision for the occupiers of the development, to encourage the sustainable management of waste and to safeguard the visual amenities of the in accordance with policies CC5, D1 and TC4 of the Camden Local Plan 2017, and Policy SI 7 of the London Plan 2021.</p>
41.	<p>Water and drainage capacity (Thames Water)</p> <p>No development shall be occupied until confirmation has been provided that either:-</p> <ol style="list-style-type: none"> <li>1. Foul Water and Surface Water capacity exists off site to serve the development, or</li> <li>2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan, or</li> <li>3. All Foul Water and Surface Water network upgrades required to accommodate the additional flows from the development have been completed.</li> </ol> <p>Reason: To ensure the water infrastructure and network are protected and can accommodate the proposed development to prevent flooding or pollution, in accordance with policy CC3 of the London Borough of Camden Local Plan.</p>
42.	<p>Water supply capacity (Thames Water)</p> <p>No development shall be occupied until confirmation has been provided that either:</p> <ul style="list-style-type: none"> <li>- all water network upgrades required to accommodate the additional demand to serve the development have been completed; or</li> </ul>



	<p>- a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan.</p> <p>Reason: To ensure the water infrastructure and network can accommodate the proposed development and supply adequate water pressure in accordance with policy D1 and CC3 of the London Borough of Camden Local</p>
43.	<p>Water main protection or diversion</p> <p>No construction shall take place within 5m of the water main. Information detailing how the developer intends to divert the asset / align the development, so as to prevent the potential for damage to subsurface potable water infrastructure, must be submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any construction must be undertaken in accordance with the terms of the approved information. Unrestricted access must be available at all times for the maintenance and repair of the asset during and after the construction works.</p> <p>Reason: To ensure the water infrastructure and network are protected and protected from damage, preventing flooding or pollution, in accordance with policy CC3 of the London Borough of Camden Local Plan.</p>
44.	<p>Utilities review</p> <p>Details of all major utilities infrastructure (including substations and other permanent structures and excluding temporary structures) including the consent of relevant utility companies to those works, shall be submitted to and approved in writing by the Local Planning Authority prior to any works taking place in relation to such structures. All works shall be carried out in accordance with the details as approved.</p> <p>Reason: To ensure a comprehensive, sustainable and integrated development, facilitate regeneration and ensure safe and efficient access and to ensure the development is carried out in accordance with the assessment and conclusions of the Environmental Impact Assessment, in accordance with policies A1, CC3 and T4 of the Camden Local Plan 2017 and policy D2 and SI 5 of the London Plan.</p>
45.	<p>Wind mitigation</p> <p>Prior to occupation full details of wind mitigation measures for the ground floor, balconies and roof terraces shall be submitted to and approved in writing by the Local Planning Authority. The proposals will thereafter be constructed and maintained in line with the approved mitigation measures.</p>

	Reason: To ensure the development is carried out in accordance with the assessment and conclusions of the Environmental Statement, in accordance with policy A1 of the Camden Local Plan 2017.
46.	<p>Archaeology</p> <p>No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works.</p> <p>If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include:</p> <p>A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works</p> <p>B. Where appropriate, details of a programme for delivering related positive public benefits</p> <p>C. The programme for post-investigation assessment and subsequent analysis, publication &amp; dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.</p> <p>Reason: To protect local heritage in accordance with policy D2 of the Camden Local Plan 2017.</p>
47.	<p>Solar glare</p> <p>Prior to commencement of the external façade of the buildings hereby approved further details of the reflectivity and the orientation of reflective surfaces such as glazing or non-matt metal and materials to be used for the external surfaces of the building shall be submitted to and approved in writing by the Local Planning Authority in consultation with Network Rail in order to ensure there are no excessive solar glare impacts on the road and rail network. Once approved the development shall be implemented in accordance with the approved details and maintained as such thereafter.</p> <p>Reason: To protect local transport infrastructure in accordance with policy T3 of the Camden Local Plan 2017.</p>
48.	Signal sighting assessment

	<p>Prior to the commencement of any demolition or construction works, the applicant shall submit a Signal Sighting Assessment for the written approval of the Local Planning Authority, in consultation with Network Rail. The assessment shall:</p> <ul style="list-style-type: none"> <li>• Assess impacts during construction (temporary lighting/equipment) and post-construction (façade materials/permanent lighting) on signals NL1111, NL1112, NL1210, NL121, and NL1213.</li> <li>• Include a Glint and Glare Assessment</li> <li>• Set out how demolition and construction will be managed to avoid any impact on signalling equipment along the North London Line viaduct, including REB NL4M124, with evidence of ASPRO consultation.</li> <li>• Confirm how safe and continued access will be maintained to the pedestrian railway access point at Maiden Lane Substation (BOK1 4mi 1106yds).</li> </ul> <p>No works shall commence until the assessment has been approved in writing by the Local Planning Authority, and the development shall thereafter be carried out in accordance with the approved details.</p> <p>Reason: To protect local transport infrastructure in accordance with policy T3 of the Camden Local Plan 2017.</p>
49.	<p>Land contamination site investigation</p> <p>No development shall commence until a site investigation is undertaken and the findings are submitted to and approved in writing by the local planning authority.</p> <p>The site investigation should assess all potential risks identified by the desktop study and should include a generic quantitative risk assessment and a revised conceptual site model. The assessment must encompass an assessment of risks posed by radon and by ground gas. All works must be carried out in compliance with LCRM (2020) and by a competent person.</p> <p>Reason: To ensure the risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors, in accordance with policies G1, D1, A1, and DM1 of the London Borough of Camden Local Plan 2017.</p>
50.	<p>Land contamination remediation</p> <p>No development shall commence until a remediation method statement (RMS) is submitted to and approved in writing by the local planning authority. This statement shall detail any required remediation works and shall be designed to mitigate any remaining risks identified in the approved quantitative risk assessment. This document should include a strategy for dealing with previously undiscovered contamination. All works must be carried out in compliance with LCRM (2020) and by a competent person.</p>

	<p>Reason: To ensure the risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors, in accordance with policies G1, D1, A1, and DM1 of the London Borough of Camden Local Plan 2017.</p>
51.	<p>Land contamination verification</p> <p>Following the completion of any remediation and prior to any above ground works, a verification report demonstrating that the remediation as outlined in the RMS have been completed should be submitted to, and approved in writing, by the local planning authority. This report shall include (but may not be limited to): details of the remediation works carried out; results of any verification sampling, testing or monitoring including the analysis of any imported soil and waste management documentation. All works must be carried out in compliance with LCRM (2020) and by a competent person.</p> <p>Reason: To ensure the risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors, in accordance with policies G1, D1, A1, and DM1 of the London Borough of Camden Local Plan 2017.</p>
52.	<p>Noise controls</p> <p>No development, other than demolition, shall commence until a detailed scheme has been submitted to and approved in writing by the Local Planning Authority to provide that all habitable rooms exposed to external railway noise in excess of 55 dBA Leq 16 hour (free field) during the day (07.00 to 23.00 hours) or 45 dBA Leq 8 hour (free field) at night (23.00 to 07.00 hours) shall be subject to sound insulation measures to ensure that all such rooms achieve an internal noise level of 35 dBA Leq 16 hour during the day and 30 dBA Leq 8 hour at night and, in bedrooms, 30 dBA Leq 8 hour at night. The submitted scheme shall ensure that habitable rooms subject to sound insulation measures shall be able to be effectively ventilated while maintaining sound insulation performance without opening windows. No dwelling shall be occupied until the approved sound insulation and ventilation measures have been installed to that property in accordance with the approved details. The approved measures shall be retained thereafter in perpetuity.</p> <p>Reason: To ensure that the amenity of occupiers of the development site are not adversely affected by noise in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.</p>
53.	<p>Equipment noise controls</p>

	<p>The rating level of the external noise levels emitted from plant/ machinery/ equipment hereby approved shall not exceed the existing background level at any noise sensitive premises when measured and corrected in accordance with BS4142:2014 +A1:2019 “Methods for rating and assessing industrial and commercial sound.</p> <p>Reason: To ensure that the amenity of occupiers of the development site are not adversely affected by noise in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.</p>
54.	<p>Equipment vibration controls</p> <p>Prior to use, machinery, plant or equipment at the development shall be mounted with proprietary anti-vibration isolators and fan motors shall be vibration isolated from the casing and adequately silenced and maintained as such.</p> <p>Reason: To ensure that the amenity of occupiers of the development site are not adversely affected by noise in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.</p>
55.	<p>Vibration protections</p> <p>The development shall be designed and constructed so as to ensure that vibration dose values do not exceed 0.4m/s<sup>1.75</sup> between 07.00 and 23.00 hours, and 0.26m/s<sup>1.75</sup> between 23.00 and 07.00 hours, as calculated in accordance with BS 6472-1:2008, entitled “Guide to Evaluation of Human Exposure to Vibration in Buildings”, [1Hz to 80Hz]. The developments shall be constructed in accordance with the approved scheme.</p> <p>Reason: To ensure that the amenity of occupiers of the development site are not adversely affected by vibration in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.</p>
56.	<p>Noise levels</p> <p>The noise level in all rooms at the development hereby approved shall meet the noise standard specified in British Standard BS8233:2014 – ‘Guidance on sound insulation and noise reduction for buildings’.</p> <p>To ensure that the amenity of occupiers of the development site are not adversely affected by noise in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.</p>
57.	<p>Lighting strategy</p> <p>Prior to the commencement of above ground works to the relevant building of the development hereby approved a lighting plan, including lux plans, shall be submitted to the local planning authority for its written approval. Once agreed any measures shall be implemented on site in full prior to first occupation of</p>

	<p>the development as necessary. The lighting plan shall be followed thereafter in perpetuity.</p> <p>Reason: To protect residential amenity in accordance with policy A1 of the London Borough of Camden Local Plan.</p>
58.	<p>Wayfinding</p> <p>Prior to the first occupation of the development hereby approved details of a lighting and wayfinding improvement scheme to the overpass between the site and the Maiden Lane Estate shall be provided to the local planning authority for its written approval. Once approved the scheme shall be implemented in accordance with the approved plans prior to the occupation of any buildings on site and maintained as such thereafter.</p> <p>Reason: To improve access to the site and ensure safety and security in the area in accordance with Policy C5 of the Camden Local Plan 2017.</p>
59.	<p>CMS for Network Rail</p> <p>Prior to the commencement of any development, including any demolition, excavation or piling works, the applicant shall submit a detailed Construction Methodology Statement for the written approval of the Local Planning Authority in consultation with Network Rail. The statement shall include (but not be limited to):</p> <ul style="list-style-type: none"> <li>•Measures to ensure continued and safe access to all railway infrastructure, including retaining walls, culverts, Kings Cross Tunnel (MCL/11), and the adjacent intersection bridge.</li> <li>•Full details of any piling, deep excavation, or ground engineering works and their potential impact on the operational railway.</li> </ul> <p>Protection measures to safeguard the structural integrity of railway assets. No works shall commence until the Construction Methodology Statement has been reviewed and confirmed as acceptable by Network Rail's Asset Protection (ASPRO) team. The development shall thereafter be carried out in full accordance with the approved details.</p> <p>Reason: To protect local transport infrastructure in accordance with policy T3 of the Camden Local Plan 2017.</p>
60.	<p>Flood Risk Emergency Plan</p> <p>No development shall commence until a Flood Risk Emergency Plan is prepared in accordance with the aims and objectives of the ADEPT/Environment Agency Flood Risk Emergency Plans for New Development guidance and submitted to and approved in writing by the Local Planning Authority. The Flood Risk Emergency Plan must include:</p>

	<ul style="list-style-type: none"> <li>- suitable routes for emergency vehicle access with suitable mapping and figures,</li> <li>- confirmation the pedestrian and cycle ramp connecting Camley Street and Wrotham Road will be constructed and laid out to allow access for emergency vehicles, including fire engines,</li> <li>- pedestrian routes should not be subject to any combination of depth and velocity that would result in a flood hazard rating<sup>1</sup> of 0.75 ('danger for some') or greater, and</li> <li>- details of signage required along the main emergency egress route, which is not predicted to be dry in extreme rainfall events.</li> </ul> <p>The measures in the approved Flood Risk Emergency Plan must be provided in their entirety prior to the first occupation of the development, and permanently retained thereafter.</p> <p>Reason: To protect the occupants in the event of a flood in accordance with policy CC3 of the London Borough of Camden Local Plan.</p>
61.	<p>Accessible homes</p> <p>The development hereby approved shall include 12 (10%) accessible homes designed to meet the requirements of Part M4(3)(2)(b) of the Building Regulations. All other residential units hereby permitted shall be constructed to comply with Part M4(2) of the Building Regulations.</p> <p>Reason: To secure appropriate access for disabled people, older people and others with mobility constraints in accordance with policies H6 and C6 of the Camden Local Plan 2017.</p>
62.	<p>Active cooling</p> <p>Prior to occupation, evidence shall be submitted and approved in writing by the Local Planning Authority, demonstrating that measures to adapt to climate change have been implemented and that overheating risk has been managed. It needs to demonstrate that the development has reduced cooling demand as far as possible and that the cooling hierarchy has been followed, measures such as fixed shading devices such as external shutters, external blinds, awnings and ventilated louvres and peak lopping of MVHR before considered active cooling and any feasible measures implemented.</p> <p>Reason: To ensure that all development reduce the impact of urban and dwelling overheating, including application of the cooling hierarchy in accordance with policy CC2 of the London Borough of Camden Local Plan.</p>
63.	<p>Landscaping</p> <p>No development shall take place above ground until full details of hard and soft landscaping and means of enclosure (boundary treatments) of all un-built, open areas and terraces have been submitted to and approved by the local planning authority in writing. Such details shall include details of any proposed earthworks including grading, mounding and other changes in ground</p>



	<p>levels. Details of tree species and sizes shall be included. Proposed trees and their canopies must not encroach upon the railway. Details of play space equipment, furniture and pavers shall also be provided. Details of landscape management and maintenance shall be included. The relevant part of the works shall not be carried out otherwise than in accordance with the details thus approved.</p> <p>Reason: In the interests of ecological value and visual amenity in accordance with policies A2, A3, A5, D1 of the Camden Local Plan 2017.</p>
64.	<p>Tree protection</p> <p>No development shall commence until details of tree protection measures have been submitted to and approved in writing by the local planning authority and until the measures of tree protection have been fully implemented. The tree protection measures shall thereafter be retained and maintained for the duration of the construction period.</p> <p>Reason: Development must not commence before this condition is discharged to ensure the retention of, and avoid irrevocable damage to, the retained <b>trees</b> and to ensure the site that represent an important visual amenity for the locality and the wider surrounding area in accordance with policy A3 of the Camden Local Plan 2017 and the London Plan 2021.</p>

#### INFORMATIVES:

1.	<p>Biodiversity Net Gain (BNG) Informative (1/3):</p> <p>The effect of paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 ("1990 Act") is that planning permission granted in England is subject to the condition ("the biodiversity gain condition") that development may not begin unless:</p> <p>(a) a Biodiversity Gain Plan has been submitted to the planning authority, and (b) the planning authority has approved the plan.</p> <p>The local planning authority (LPA) that would approve any Biodiversity Gain Plan (BGP) (if required) is London Borough of Camden.</p> <p>There are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply. These are summarised below, but you should check the legislation yourself and ensure you meet the statutory requirements.</p> <p>Based on the information provided, this permission WILL require approval of a BGP before development is begun because none of the statutory exemptions or transitional arrangements summarised below are considered to apply.</p>
2.	<p>Biodiversity Net Gain (BNG) Informative (2/3):</p>

	<p>+ Summary of transitional arrangements and exemptions for biodiversity gain condition.</p> <p>The following are provided for information and may not apply to this permission:</p> <ol style="list-style-type: none"> <li>1. The planning application was made before 12 February 2024.</li> <li>2. The planning permission is retrospective.</li> <li>3. The planning permission was granted under section 73 of the Town and Country Planning Act 1990 and the original (parent) planning permission was made or granted before 12 February 2024.</li> <li>4. The permission is exempt because of one or more of the reasons below: <ul style="list-style-type: none"> <li>- It is not "major development" and the application was made or granted before 2 April 2024, or planning permission is granted under section 73 and the original (parent) permission was made or granted before 2 April 2024.</li> <li>- It is below the de minimis threshold (because it does not impact an onsite priority habitat AND impacts less than 25 square metres of onsite habitat with biodiversity value greater than zero and less than 5 metres in length of onsite linear habitat).</li> <li>- The application is a Householder Application.</li> <li>- It is for development of a "Biodiversity Gain Site".</li> <li>- It is Self and Custom Build Development (for no more than 9 dwellings on a site no larger than 0.5 hectares and consists exclusively of dwellings which are Self-Build or Custom Housebuilding).</li> <li>- It forms part of, or is ancillary to, the high-speed railway transport network (High Speed 2).</li> </ul> </li> </ol>
3.	<p>Biodiversity Net Gain (BNG) Informative (3/3):</p> <p>+ Irreplaceable habitat:</p> <p>If the onsite habitat includes Irreplaceable Habitat (within the meaning of the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024) there are additional requirements. In addition to information about minimising adverse impacts on the habitat, the BGP must include information on compensation for any impact on the biodiversity of the irreplaceable habitat. The LPA can only approve a BGP if satisfied that the impact on the irreplaceable habitat is minimised and appropriate arrangements have been made for compensating for any impact which do not include the use of biodiversity credits.</p> <p>+ The effect of section 73(2D) of the Town &amp; Country Planning Act 1990</p> <p>If planning permission is granted under section 73, and a BGP was approved in relation to the previous planning permission ("the earlier BGP"), the earlier BGP may be regarded as approved for the purpose of discharging the biodiversity gain condition on this permission. It will be regarded as approved if the conditions attached (and so the permission granted) do not affect both the post-development value of the onsite habitat and any arrangements made to compensate irreplaceable habitat as specified in the earlier BGP.</p> <p>+ Phased development</p> <p>In the case of phased development, the BGP will be required to be submitted to and approved by the LPA before development can begin (the overall plan), and before each phase of development can begin (phase plans). The modifications in respect of the biodiversity gain condition in phased development are set out in Part 2 of the Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations 2024.</p>

4.	Written schemes of investigation will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.
5.	This approval does not authorise the use of the public highway. Any requirement to use the public highway, such as for hoardings, temporary road closures and suspension of parking bays, will be subject to approval of relevant licence from the Council's Streetworks Authorisations & Compliance Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No 020 7974 4444). Licences and authorisations need to be sought in advance of proposed works. Where development is subject to a Construction Management Plan (through a requirement in a S106 agreement), no licence or authorisation will be granted until the Construction Management Plan is approved by the Council.
6.	Your proposals may be subject to control under the Building Regulations and/or the London Buildings Acts that cover aspects including fire and emergency escape, access and facilities for people with disabilities and sound insulation between dwellings. You are advised to consult the Council's Building Control Service, Camden Town Hall, Judd St, Kings Cross, London NW1 2QS (tel: 020-7974 6941).

7.	<p>All works should be conducted in accordance with the Camden Minimum Requirements - a copy is available on the Council's website (search for 'Camden Minimum Requirements' at <a href="http://www.camden.gov.uk">www.camden.gov.uk</a>) or contact the Council's Noise and Licensing Enforcement Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No. 020 7974 4444)</p> <p>Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. You must secure the approval of the Council's Noise and Licensing Enforcement Team prior to undertaking such activities outside these hours.</p>
8.	<p>Your attention is drawn to the need for compliance with the requirements of the Environmental Health regulations, Compliance and Enforcement team, [Regulatory Services] Camden Town Hall, Argyle Street, WC1H 8EQ, (tel: 020 7974 4444) particularly in respect of arrangements for ventilation and the extraction of cooking fumes and smells.</p>
9.	<p>This proposal may be liable for the Mayor of London's Community Infrastructure Levy (CIL) and the Camden CIL. Both CILs are collected by Camden Council after a liable scheme has started, and could be subject to surcharges for failure to assume liability or submit a commencement notice PRIOR to commencement. We issue formal CIL liability notices setting out how much you may have to pay once a liable party has been established. CIL payments will be subject to indexation in line with construction costs index. You can visit our planning website at <a href="http://www.camden.gov.uk/cil">www.camden.gov.uk/cil</a> for more information, including guidance on your liability, charges, how to pay and who to contact for more advice. Camden adopted new CIL rates in October 2020 which can be viewed at the above link.</p>
10.	<p>Given the proposed development proximity adjacent to the operational railway, NR strongly requests that the Applicant contacts its ASPRO team and enter into an Asset Protection Agreement with us via: <a href="mailto:assetprotectioneastern@networkrail.co.uk">assetprotectioneastern@networkrail.co.uk</a> and <a href="mailto:AssetProtectionAnglia@networkrail.co.uk">AssetProtectionAnglia@networkrail.co.uk</a>. The following items will need to be considered as part of the Asset Protection Agreement.</p> <ul style="list-style-type: none"> <li>• Demolition: Works close to the railway present high risk and must be controlled to prevent collapse toward NR land. Early ASPRO consultation is strongly advised.</li> <li>• Plant/Equipment: No plant, machinery, or compound collapse radius should be within 4m of the railway boundary.</li> <li>• Temporary Works: Any scaffolding or temporary structures will require ASPRO assurance.</li> <li>• Rail Bridge Between Sites: A Traffic Management Plan (TMP) will need to be submitted to and reviewed by ASPRO. The TMP should be included within the RAMS (Risk Assessment and Method Statement) documentation for assessment.</li> <li>• TfL Consultation: TfL should be consulted, and a tunnel/structures impact assessment may be necessary due to foundation and piling works.</li> </ul>
11.	<p>In advance of devising the programme of archaeological works pursuant to the requirements of the relevant condition of this consent, full regard should be had to</p>

	the consultation response received from Historic England (copy available on the planning file).
12.	<p>A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing <a href="mailto:trade.effluent@thameswater.co.uk">trade.effluent@thameswater.co.uk</a> . Application forms should be completed online via <a href="http://www.thameswater.co.uk">www.thameswater.co.uk</a>. Please refer to the Wholesale; Business customers; Groundwater discharges section.</p>
13.	<p>Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.</p> <p>There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <a href="https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes">https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes</a></p> <p>If you are planning on using mains water for construction purposes, it's important you let Thames Water know before you start using it, to avoid potential fines for improper usage. More information and how to apply can be found online at <a href="http://thameswater.co.uk/buildingwater">thameswater.co.uk/buildingwater</a>.</p>
14.	<p>Your attention is drawn to the fact that there is a separate (shadow) legal agreement with the Council which relates to the development for which this permission is granted. Information/drawings relating to the discharge of matters covered by the Heads of Terms of the legal agreement should be marked for the attention of the Planning Obligations Officer, Sites Team, Camden Town Hall, Argyle Street, WC1H 8EQ.</p>

15.	You are advised the developer and appointed / potential contractors should take the Council's guidance on Construction Management Plans (CMP) into consideration prior to finalising work programmes and must submit the plan using the Council's CMP pro-forma; this is available on the Council's website at <a href="https://beta.camden.gov.uk/web/guest/construction-management-plans">https://beta.camden.gov.uk/web/guest/construction-management-plans</a> or contact the Council's Planning Obligations Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No. 020 7974 4444). No development works can start on site until the CMP obligation has been discharged by the Council and failure to supply the relevant information may mean the council cannot accept the submission as valid, causing delays to scheme implementation. Sufficient time should be afforded in work plans to allow for public liaison, revisions of CMPs and approval by the Council.
16.	Your proposals may be subject to control under the Party Wall etc Act 1996 which covers party wall matters, boundary walls and excavations near neighbouring buildings. You are advised to consult a suitably qualified and experienced Building Engineer.
17.	The display of an advertisement without consent is a criminal offence under Section 224(3) of the Town and Country Planning Act 1990. Under Section 225 of the Town and Country Planning Act, Section 10 of the London Local Authorities Act 1995 and Section 11 of the London Local Authorities Act 1995 the Council has powers to enter the land and remove the display. As such, the Council will commence prosecution/action to secure the removal of the advertisement.
18.	The correct street number or number and name must be displayed permanently on the premises in accordance with regulations made under Section 12 of the London Building (Amendments) Act 1939.
19.	With regard to the relevant condition above the preliminary risk assessment is required in accordance with CLR11 model procedures for management of contaminated land and must include an appropriate scheme of investigation with a schedule of work detailing the proposed sampling and analysis strategy. You are advised that the London Borough of Camden offer an Enhanced Environmental Information Review available from the Contaminated Land Officer (who has access to the Council's historical land use data) on 020 7974 4444, or by email, <a href="http://www.camden.gov.uk/ccm/content/contacts/council-contacts/environment/contact-the-contaminated-land-officer.en">http://www.camden.gov.uk/ccm/content/contacts/council-contacts/environment/contact-the-contaminated-land-officer.en</a> , and that this <a href="http://www.camden.gov.uk/ccm/navigation/environment/pollution/contaminated-land/">http://www.camden.gov.uk/ccm/navigation/environment/pollution/contaminated-land/</a> , or from the Environment Agency at <a href="http://www.environment-agency.gov.uk">www.environment-agency.gov.uk</a> .

