Address:	3-30 Cedar Way London N1C 4PD		**2**
Application Number:	2025/4364/P	**Officer:** Christopher Smith	
Ward:	Kings Cross		
Date Received:	30/09/2025		

Proposal:

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. (See associated application ref. 2025/4341/P at 120-136 Camley Street).

Background Papers, Supporting Documents and Drawing Numbers:

The development hereby permitted shall be carried out in accordance with the following approved plans:

See Conditions List

RECOMMENDATION SUMMARY:

Grant conditional Full Planning Permission following:
(i) referral to Mayor of London for his direction,
(ii) finalisation of detailed wording for conditions following consultation with the Mayor, and
(iii) completion of Section 106 Agreement.

Applicant:	**Agent:**
London Borough of Camden (Community Investment Programme) and Ballymore (Camley Street) Limited - a Joint Venture of Ballymore Limited & Lateral Partners Ltd C/o Agent	Mr Oliver Jefferson Turley Brownlow Yard 12 Roger Street London WC1N 2JU

ANALYSIS INFORMATION – SITE B

Existing use	**Floorspace (GIA)**
Industrial Storage and Distribution Uses (Use Class B8)	1,284sqm
Commercial, Business and Service Uses	4,576sqm

(Use Class E)	
Total	**5,860sqm**

Proposed number of homes

Market homes	Affordable (Intermediate Rent) homes	Total homes
203 (72%)	79 (28%)	282

Proposed floorspace

Commercial (GIA)	Market Residential (GIA)	Affordable Residential (GIA)	Total Area (GIA)
28,677sqm (50%)	21,346sqm (37%)	7,176sqm (13%)	57,199sqm

Proposed housing mix and tenure

Tenure	1 bed	2 bed	3 bed	4 bed	Total
Market	77 (38%)	89 (44%)	37 (18%)	0 (0%)	**203 (72%)**
Intermediate rent	38 (48%)	41 (52%)	0 (0%)	0 (0%)	**79 (28%)**
Total homes	**115 (41%)**	**130 (46%)**	**37 (13%)**	**0 (0%)**	**282**

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%)
TOTAL	**203 (50.6%)**	**79 (19.7%)**	**119 (29.7%)**	**401**

Proposed floorspace

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

Proposed housing mix and tenure

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

EXECUTIVE SUMMARY

The Application Site at 3-30 Cedar Way comprises a 0.96 hectare rectangular plot bounded by 108 and 110-114 Camley Street to the south, railway lines to the east, Camley Street to the west and Units 1-2 Cedar Way and more railway lines, including a Network Rail access point, to the north. This area is hereafter referred as the "Site". It is also known as Site B 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 (known as Site A) and 3-30 Cedar Way, N1C 4PD (this site – Site B).

The proposals at Site B would deliver three separate buildings and publicly accessible open space around them. Building B1 would be the main residential building at 31 storeys in height, B2 would also be in residential use at 9 storeys in height and B3 would be the main commercial use building 13 storeys in height. Each building would be topped with a plant room.

The existing site is part of an industrial estate with an access road running through it, which is known as Cedar Way. It is occupied by single storey industrial units on the western side and double height industrial units by the railway line to the east. The associated yard areas are used for vehicle parking.

The Local Plan seeks to protect employment space but does allow for redevelopment of sites in some cases where it allows for intensification of uses 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 S6) in the form of new permanent self-contained homes and employment space, which would be provided on Site B in the form of housing (including intermediate rent affordable housing), a high-tech industrial hub building for life science and other tech businesses and supporting retail and food/beverage units. The ground floor of the hub building would include a 'mixer' space' for talks, exhibitions and other activities that allow public access and community usage. 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 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 as well as many new homes.

The development would provide 282 homes with 79 intermediate rent homes (15% of the total by unit) and 203 homes for market sale. These homes make a significant contribution towards the Council's housing targets and in alleviating the demand for affordable housing. The new homes would be of a high quality with energy demand minimised. Across both Site A and Site B the proposals taken together are policy-compliant in terms of their affordable housing provision on public land with 52% affordable housing provided by habitable room (50% by areas and 49% by unit). This

multi-site arrangement is considered acceptable in principle and is supported by the Greater London Authority. Policy-compliance will be secured by a payment in lieu of social-affordable housing on Site B, which will enable the delivery of the proposed development on Site A through a development agreement.

The proposed buildings are generally considered to be of a height, form and detailed design which responds well to its surrounding context. The scheme does include a tall building of 31 storeys; careful consideration has been given to the scale of this building as set out in the report and it is considered acceptable. The spaces around the buildings have been designed to create a welcoming, inclusive and safer environment for residents and workers and will help connect the scheme into the wider area.

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. For Site B the principal heritage impact is on the Grade I Listed All Saints Greek Orthodox Church, for which there is less than substantial harm at the medium part of the scale to the setting. Other heritage assets such as nearby conservation areas are also affected at the lower and very low end of the scale by the proposed development on Site B. 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 substantial social, environmental and economic benefits including new housing and affordable housing, retail and food/drink facilities, community access to the tech hub building, an improved public realm including a new public square, energy efficient development and a package of social value measures the value of which would exceed £1 million over ten years.

Building B1 would be the tallest building at 31 storeys, with the scale and massing of the buildings on site being a significant increase on the existing situation. The existing low rise nature of the existing buildings and the scale of new development 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 relatively small number of properties for a scheme of this scale in an urban area and are considered acceptable given the wider benefits this application would provide both economically and in terms of new housing and affordable housing.

The development would be car free with good quality cycle parking provided within the new buildings and the public realm. 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/ training and social value measures, 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 and street lighting.

Officers consider that there are significant and compelling public benefits, including the provision of new housing and affordable housing, energy-efficient high-quality homes, urban renewal providing high-quality public realm, improved safety and security in the local area, and a substantial package of social value measures, that would outweigh the 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 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)]; and 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 150 residential units, 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 to Buro Happold's satisfaction.

1. THE SITE

1.1 3-30 Cedar Way comprises a 0.96 hectare rectangular plot bounded by 108 and 110-114 Camley Street to the south, railway lines to the east, Camley Street to the west and Units 1-2 Cedar Way and more railway lines, including a Network Rail access point, to the north. This area is hereafter referred as the "Site". It is also known as Site B 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 (known as Site A) and 3-30 Cedar Way, N1C 4PD (this site – Site B).

1.2 The existing site is part of an industrial estate with an access road running through it, which is known as Cedar Way. It is occupied by single storey industrial units on the western side and double height industrial units by the railway line to the east. The associated yard areas are used for vehicle parking. The railway tracks to the north are at a higher level and are expected to 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. Beyond Camley Street to the west is the Elm Grove residential estate. To the east of the site is a wide area of land occupied by railway tracks, a concrete plant and industrial buildings accommodating Council services. Further to the south are existing industrial type businesses.

1.3 To the north-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).

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 cover 1,289sqm in floorspace and are occupied by a range of businesses, largely operating under Use Class E (commercial, business and service uses) though with some Use Class B8 (storage/distribution) functions also apparent.

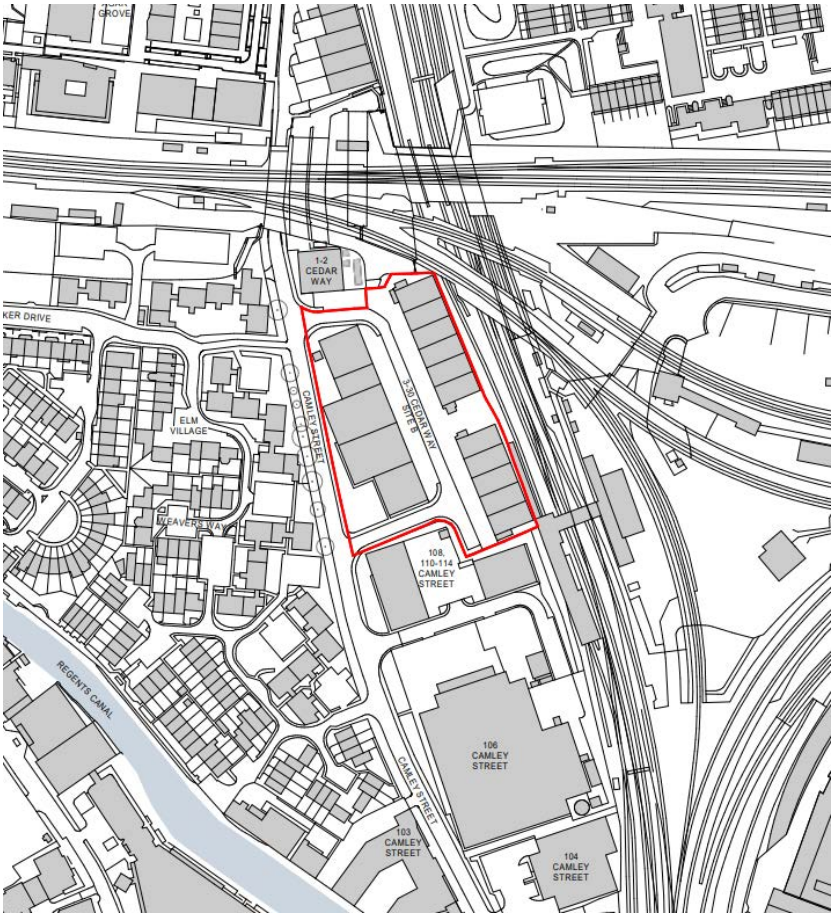


Figure 1 - Site plan showing location of the existing buildings

1.5 The area above is covered by a site allocation in the emerging draft Camden Local Plan. The site is located within the northern part of the proposed allocation S6, which is designated for 750 permanent self-contained homes (Use Class C3) and employment activities including research and knowledge-based uses, light industrial use, 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. Given this the site is within the Camley Street Neighbourhood Forum area.

1.9 Vehicular access is available from the east, via two access points and vehicles can reach the site from both the north and south on Camley Street. Railway lines prevent access from the east.

1.10 The site is in Controlled Parking Zone (CPZ) CA-X Camden Square, which controls parking between 0830 and 1830 Monday to Friday, and 0830 to 1200 on Saturday. There are no parking restrictions on other days.

1.11 Site B has a maximum public transport accessibility level (PTAL) of 4 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 B 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 Regent's Canal which is 250 metres to the west.

1.13 The site is located between, but not within, two London View Management Framework Viewing Corridors namely 2A.1 (Parliament Hill to St Paul's Cathedral) which is to the south-west and 3A.1 (Kenwood viewing gazebo to St Paul's Cathedral) which is to the north-east. The image below shows the views running across the site.

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

1.14 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.

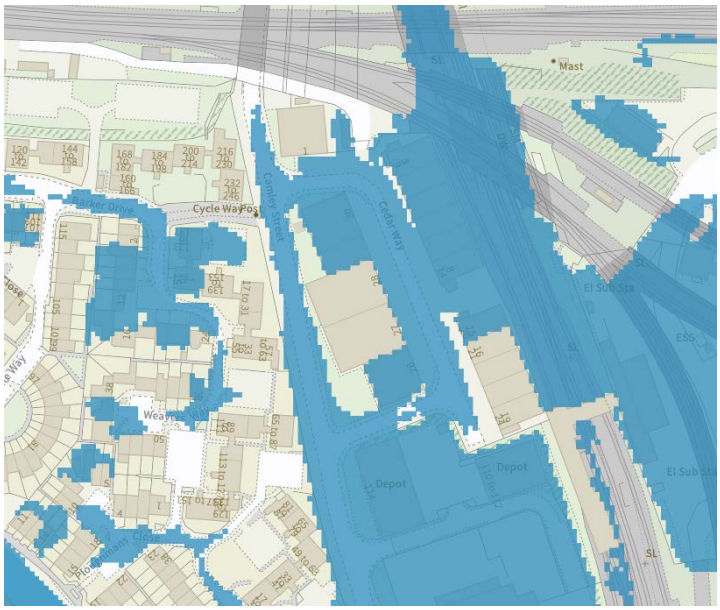


Figure 3 – EA Flood Map showing areas at risk of surface water flooding once in every 1000 years

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

Surrounding Area

1.16 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.

1.17 Other key policy designations nearby include Aggregate Safeguarding and SINCs to the east and open space designations on the adjacent Maiden Lane, Agar Grove and Elm Village estates. Regent's Canal is a short walk to the west of Site B.

1.18 The surrounding area generally has a residential or industrial characterisation with land to the west and north-west being predominantly residential and the land to the north, south and east being industrial land or railway infrastructure.

1.19 The scale of housing in the area is varied. Elm Village to the west includes buildings of mostly two to four storeys in height. The Agar Grove Estate to the north-west has residential buildings ranging two up to 18 storeys.

1.20 The land to the south of Site B is located within the same site allocation of the draft Local Plan, s6, as the host site. The allocation covers land on 104 to 114 Camley Street as well.

1.21 Land beyond the railway line to the north is also allocated for future development (Site Allocation S5 in the emerging Draft Local Plan) with an indicative capacity of 110 self-contained homes plus employment space. The site allocation S5 indicates that allocations S5 and S6 may potentially be assessed together. Planning permission is also being sought for development on that site allocation (known as Site A – planning ref. 2025/4341/P) which is to be considered at the same time as this application.

1.22 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 B would deliver three blocks of development over Buildings B1, B2 and B3 comprising 282 residential units and high-tech commercial space.

2.2 Building B1 would be 31 storeys in height with all of the 220 market homes and 17 intermediate rent homes. Building B2 would be nine storeys in height with a mansion block style appearance incorporating 62 intermediate rent homes with retail uses at ground floor. Building B3 would be 13 storeys in height with a mix of active frontages at ground floor including a large

reception area and ‘mixer’ space with high-tech light industrial uses and office/laboratory uses on the floors above.

Figure 4 – Image of buildings from west (elevated perspective)

2.3 All existing buildings would be demolished resulting in the removal of the industrial units from the site.

2.4 The development would provide improvements to the public realm environment including areas of open and play space, active frontages, a new amenity area to the middle of the site and improved lighting.

2.5 The development would be car free with accessible vehicle parking provided on street. High-quality cycle parking would be provided within the buildings and in the public realm.

Figure 5 – Image of buildings from proposed internal amenity area

3. APPLICATION CONTEXT AND CONNECTIVITY

3.1 This detailed planning application is for Full Planning Permission and relates to a single plot of development (Site B). The application is therefore being considered on its own merits and on the basis of the information provided with it and with reference the planning policy and legislative context 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 120-136 Camley Street (Ref. 2025/4341/P – known as Site A) and it is acknowledged by the Council that these applications are interconnected, though 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.

3.5

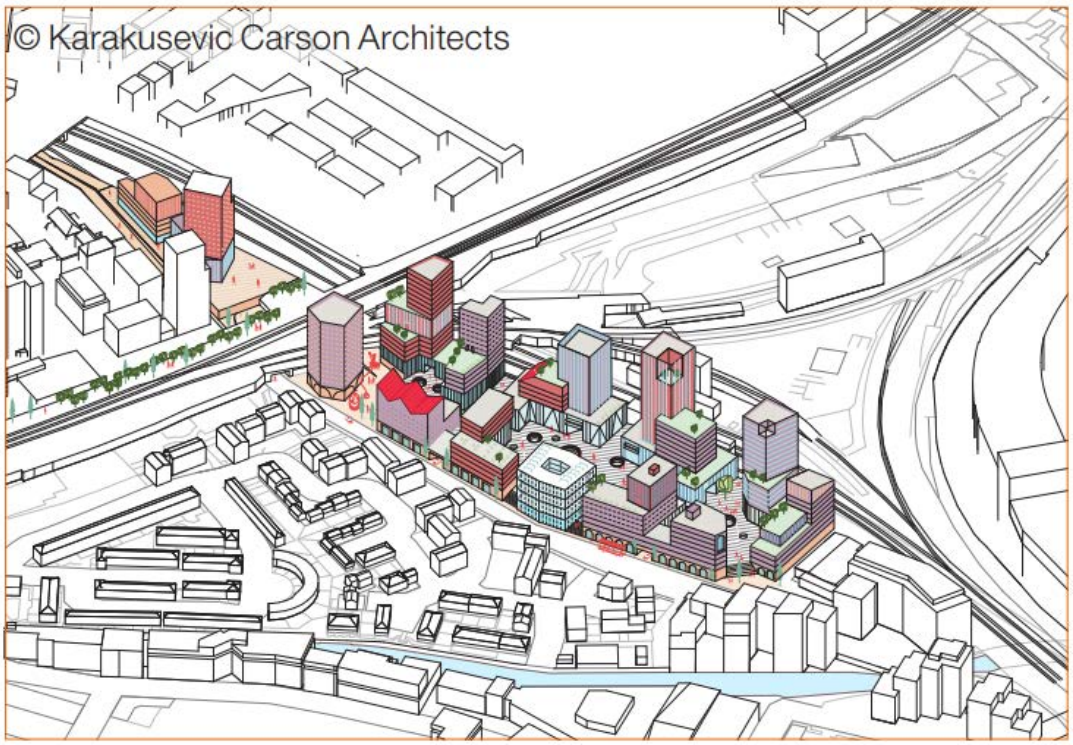


Figure 6 – Illustrative masterplan for the area with view towards north-east as presented in the Camley Street Neighbourhood Plan (2021)

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

3.7 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 t future development projects like the Camden Highline.

Figure 7 – CGI illustrative masterplan (from north towards Kings Cross station) with Site B in the centre 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
- Parcelforce and ATS Tyre Centre – Draft Site Allocation S7 – 2020/0728/P
- Bangor Wharf and Eagle Wharf – Draft Site Allocation S10
- Pilot 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
- Ampthill & 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. RELEVANT PLANNING HISTORY

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

The application site (Site B)

5.2 Various minor alteration applications and change of use applications within industrial-type use classes.

5.3 The following planning decisions (advertisement consents excluded) have been made since 2004:

- **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 30th October 2025. (120 - 136 Camley Street & 3 - 30 Cedar Way)
- **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 29th May 2025. (120 - 136 Camley Street & 3 - 30 Cedar Way)
- **2021/3719/P**. Use of premises for business use (Class E). Granted 13th October 2021. (Unit 21-22)
- **2006/2338/P**. Use of the unit as a catering butcher (Class B1). Permission granted 21st 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 2nd May 2006. (Unit 9)
- **2006/1092/P**. Certificate of lawfulness for the existing use of the unit as a catering butcher. Permission refused 4th 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 11th November 2005. (Unit 9)
- **2004/4914/P**. Change of use from Class B1 to Class B8 (warehouse). Permission granted 3rd 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 15th April 2004. (Units 15-24)

The surrounding area

120-136 Camley Street (Site A)

5.4 No relevant history for this site since the 1980s, other than the recent applications below.

- **2025/4341/P**. 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). (SITE A) Pending determination, recommended for approval and also on this committee agenda (Item 1)

- **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 30th October 2025. (includes 3 - 30 Cedar Way)

- **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)

1-2 Cedar Way

5.5 No relevant planning history.

110 Camley Street

5.6 **2013/7715/P**. Installation of anaerobic digestion system including 2x polytunnels, and associated equipment. Permission granted 27th March 2014.

Camley Street Railway Bridge Underpass

5.7 **2022/1822/P**. Installation of 10 panels for the display of public art from 01/06/2022. Permission granted 6th June 2022.

Camden Highline

5.8 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.

5.9 There is also an associated Listed Building application **2022/2072/L** which was put before the same committee meeting.

5.10 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.

5.11 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.

Agar Grove Estate

5.12 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)

5.13 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.

5.14 The scheme has now reached phase 4 with approximately 70% of the scheme built and half of the dwellings occupied. Travel surveys are currently underway.

6. CONSULTATION SUMMARY

Statutory Consultees

GLA

6.1 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

6.2 Affordable housing: The proposal would deliver 79 intermediate rent homes on site. In addition a payment would be made towards the delivery of 119 social rent homes at 120-136 Camley Street (application 2025/4341/P).

Across the two sites, 51% affordable housing would be provided by habitable room (68:32 tenure split). On this basis, GLA officers could accept that the proposals follow the Fast Track Route subject to acceptable affordable tenures and mechanisms for delivery

6.3 Urban design and heritage: The design is supported at this stage, also having regard to impacts on strategic views and heritage. Further testing of materials for Block B1 is encouraged. Measures should be secured relating to Agent of Change, inclusive design and fire safety

6.4 Scale, form, massing and architectural quality: The proposal includes buildings between 9 and 31 storeys in height which would constitute a tall building according to the borough's local definition. The site is not identified in the adopted local plan as a site which is suitable for tall buildings. Accordingly, the proposals do not meet the locational requirements of London Plan policy D9 (Part B). However, the emerging local plan includes the site as a location where tall buildings may be appropriate which is a material consideration. An indicative height range of 15 to 62 metres is highlighted as potentially appropriate with potential for additional height in some locations on the site, subject to testing of impacts on strategic views.

6.5 Notwithstanding the non-compliance with Policy D9(B), at this stage GLA officers consider that the proposed tall buildings could be accommodated on the site when considering tall building impacts outlined under Policy D9 (Part C). In terms of visual impacts, GLA officers welcome the quality and attention to detail across the buildings and consider the visual impacts of the development to be largely acceptable. The design team is encouraged to continue to work closely with the Council to ensure tones of materials are carefully considered given the visual prominence and landmark nature of Block B1. It is considered that further testing and potential design development is required on this matter, although it may be the case that this could be addressed through planning condition. The attention to detail, vertical emphasis, articulation of the 'crown' and materials palette are otherwise supported

6.6 Transport: Improvements to the surrounding active travel environment should be secured. Public transport network impacts do not require mitigation. Improvements should be sought by the Council towards the surrounding active travel environment in line with Healthy Streets principles set out within London Plan policy T2. Interventions towards enhancing the Camley Street underpass should be 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. Enhancing the lighting strategy and safety is key for future residents and users of the site.

6.7 Impacts on strategic views are considered acceptable.

6.8 The approach to layout, public realm and landscaping is acceptable in strategic terms.

6.9 Residential quality: 51% of the proposed homes would be dual aspect. Larger units have been prioritised as dual aspect which is welcomed and single aspect homes would benefit from good levels of natural light, privacy and outlook. All dwellings would meet or exceed internal space standards and have access to private external amenity space

6.10 Agent of Change: The development comes forward next to major strategic transport infrastructure and the Agent of Change principle is applicable as set out within London Plan policy D13. It is expected that suitable mitigations will be robustly secured in relation to noise and vibration to adhere to this principle. Further details are also required on the ventilation strategy in relation to the cooling hierarchy and the ES sets out that further review of detailed façade specifications should be undertaken at the detailed design stage to ensure that solar glare impacts on surrounding strategic infrastructure is appropriately managed.

6.11 Fire safety and inclusive design: The submission demonstrates consideration of inclusive design and access in accordance with London Plan policy D5. M4(3) and M4(2) requirements and suitable inclusive design and access details should be secured relating to building and site design

6.12 Heritage: The proposed development is in the setting of the designated heritage assets, including St Paul's Cathedral, listed Grade I. Harm is caused to St Paul's Cathedral, All Saints Greek Orthodox Church (Grade II), and Numbers 82 to 90 Pratt Street (Grade II). Therefore, the proposals do not comply with London Plan policy HC1. However, in accordance with the provisions of the NPPF, the harm must be weighed against the public numerous identified public benefits, notably housing/affordable housing, along with the provision of workspace and affordable workspace in line with local aspirations for the site; these public benefits have the potential to clearly and convincingly outweigh the harm to the assets identified above. A final balancing exercise will be undertaken at Stage II once the public benefits package is secured

6.13 Environment and Sustainable Construction - The following aspects require more detail:

- further exploration of energy efficiency measures for the domestic and non-domestic element;
- demonstration that renewable energy has been maximised, including roof layouts showing the extent of PV provision and details of the proposed air source heat pumps;
- further details on the design of the heat network, and the future connection to this network must be secured by condition or obligation; and

- further details to demonstrate the cooling hierarchy has been followed.

6.14 Clarification required on the whole-life carbon assessment and circular economy. The urban greening factor score should be improved. In terms of air quality a discrepancy with dust risk needs resolving.

GLA Update:

6.15 Environment and Sustainable Construction and Circular Economy - the majority of comments have now been addressed, subject to conditions/obligations where relevant. An updated CE spreadsheet and a CE Statement Addendum have been provided, and remaining elements relate 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. Also consideration to be given to: design reasons for material intensities which significantly deviate from those in LPG, specific actions which will be undertaken to implement targets and clarification with respect to end-of-life strategy.

6.16 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.

Officer response: Further commentary on these points will be provided in the relevant sections on Energy and Sustainability below.

Historic England

6.17 HE advised not necessary to consult.

Historic England (GLAAS)

6.18 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.

Officer response: The requested planning conditions/informatives are to be applied.

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

6.19 Content with fire safety design of the proposals, to the extent it affects land use planning considerations. Identified some matters that will need to be addressed ahead of later regulatory stages.

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)

6.20 The trip rates in the transport assessment are not accepted as the split between offices (60%) and research and development (40%) reflects the lower density typically associated with lab space. Request reassessment of trip generation.

Update on Transport for London (TfL):

6.21 Following a meeting to review the trip generation following Stage 1 comments TfL confirm the proposals have been designed for science and technology uses, consistent with the Council's Cabinet paper and draft Local Plan allocations (S5, S6). Further trip generation analysis has been undertaken following TfL's request. The updated trip generation analysis shows that, even under a full office use scenario, transport impacts would be minimal, and methodological updates to residential trip generation have been shared and are satisfactory. On this basis, the proposals are acceptable in transport terms, both under the intended occupational strategy and the office scenario considered.

Officer's response: See 'Transport' section for discussion. Section 106 obligations and conditions are attached to secure the above items, where appropriate.

Network Rail

6.22 Consultants on behalf of Network Rail and DB Cargo (*w*ho 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

6.23 No objections subject to conditions and informatives on piling, waste and water management.

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

Metropolitan Police (Designing Out Crime)

6.24 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.

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 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

6.25 No objection.

Environment Agency

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

Cadent Gas

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

National Grid

6.28 No comments received.

Sport England

6.29 No comment as outside of outside statutory remit.

Canal and Rivers Trust

6.30 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

6.31 No comments received.

Islington Council

6.32 No objection.

Westminster Council

6.33 No objection.

Camden Clinical Commissioning Group

6.34 No response.

NHS

6.35 No response

London Healthy Urban Development Unit

6.36 No response.

London Fire Brigade

6.37 No response.

British Transport Police

6.38 No response.

Camley Street Neighbourhood Forum

6.39 No response received.

Local groups

Camden Square Neighbourhood Association

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

King's Cross Development Forum

6.41 No response.

Maiden Lane Tenants Association

6.42 No response.

Regent's Canal CAAC

6.43 No comments received.

King's Cross CAAC

6.44 No comments received.

Camden Broadway CAAC

6.45 No comments received.

Camden Cycling Campaign

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

Publicity

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

6.48 Representations have been received from two parties further to publicity; who object to the proposals on the following grounds:

- Building B1 at 30 storeys is totally disproportionate to the scale of the scheme and would be significantly overbearing to residents in Elm Village.
- 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.
- There are two food premises next to the demolition site, which will disturb the drains and sewers. There is no provision for pest control in the planning application.
- The height and appropriate sizing of the fence between the demolition site and the food premises have not been specified. This needs to be specified to a suitable height to prevent windblown dust contamination

Officer response:

- *The emerging local plan site allocation identifies this as a potential site for tall buildings. Careful consideration has been given to the proposed height and whether it can be accommodated taking account of all relevant planning issues including design, impact on townscape, views, amenity, open space and microclimate. It is considered that the proposed height, form and design of the buildings is acceptable and will optimise use of this brownfield land delivering on strategic priorities to deliver new homes and jobs.*
- *The proposed development would result in the loss of industrial space, but would a significant employment offer which is more compatible with residential on the site and which would allow for the efficient use of the land.*
- *The construction process would be managed via a Construction Management Plan, a Construction Working Group is also proposed which would allow continuous engagement with the community including neighbouring businesses. Measures will be taken to ensure that the impact of the construction works is minimised as far as possible.*

Developer-led consultation

6.49 The Applicant has carried out an extensive and sustained period of engagement activity between 2019 and 2025 to discuss the 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.

6.50 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.

6.51 The Camley Street Steering Group was formed from a blend of 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.

6.52 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.

6.53 In addition, extensive consultation has taken place with a large number of stakeholders including the Council as LPA, GLA, TfL and local organisations including schools.

6.54 The consultation strategy has been largely led by the Council 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

6.55 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.

6.56 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

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

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

6.59 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

6.60 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.

6.61 ***Pre-application Engagement***

Design Review Panel

6.62 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 commends and 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, 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.
- The composition of blocks on Site B has improved significantly and the buildings now work well together. The crown of B1 could be more vertically expressed to reduce bulk, and the eastern side reflected to

provide visual relief. Block B2 needs more work to develop a stronger identity with a clearer logic. The design of block B3 is strongly supported.

- Landscape designs are impressive.
- It is important to ensure the pedestrian overpass to the Maiden Lane Estate is has natural surveillance to ensure it feels safe.
- The energy strategy is supported. An embodied carbon strategy is also needed.

Development Management Forum and Technical Briefing

6.63 The proposals were presented to a Development Management Forum on 21st July 2025. Questions focused on a wide range of matters including scale and height, impact on views, loss of businesses, traffic, noise and construction impact plus public realm and play space.

6.64 A post-submission technical briefing for Councillors took place on 28th October 2025.

7. 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 E1 Offices
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 E9 Retail, markets and hot food takeaways
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 D3 Shopfronts
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 TC1 Quantity and location of retail development
Policy TC5 Small and independent shops
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 G12 New Open Space Provision
Policy CS G13 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 S6

7.1 The DCLP identifies the site as draft site allocation S6 for Permanent self-contained homes and employment (including research and knowledge-based uses, light industrial, maker spaces, offices) Capacity has been estimated at 750 additional self-contained homes, but should relate to the scale of all additional floor area (GIA) proposed, and potentially be assessed in conjunction with the development of 120 – 136 Camley Street (Allocation S5)

8. ASSESSMENT

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

9. PRINCIPLE OF REDEVELOPMENT
10. LAND USE
11. AFFORDABLE HOUSING
12. HOUSING MIX
13. QUALITY OF PROPOSED HOUSING
14. HERITAGE
15. DESIGN
16. IMPACT ON NEIGHBOURING AMENITY
17. MICROCLIMATE
18. LANDSCAPE AND PUBLIC OPEN SPACE
19. TREES, GREENING, AND BIODIVERSITY
20. TRANSPORT
21. SAFETY AND SECURITY
22. FIRE SAFETY
23. AIR QUALITY
24. WASTE AND RECYCLING
25. BASEMENT CONSIDERATIONS

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

9. PRINCIPLE OF REDEVELOPMENT

9.1 The site is brownfield land, featuring ageing industrial buildings on a rectangular plot sited on an industrial estate located between two sets of railway lines, a road and further industrial uses. Much of the land is used for storage, access and vehicle parking associated with the industrial uses on site.

9.2 The site benefits from good public transport access (max. public transport accessibility level (PTAL) of 4) 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.

9.3 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.

9.4 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.

9.5 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.

9.6 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.

9.7 The application site benefits from good transport links and therefore it is expected that the site should deliver higher density development.

9.8 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.

9.9 The Camley Street Neighbourhood Plan (CSNP) includes Site B (and Site A) towards 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.

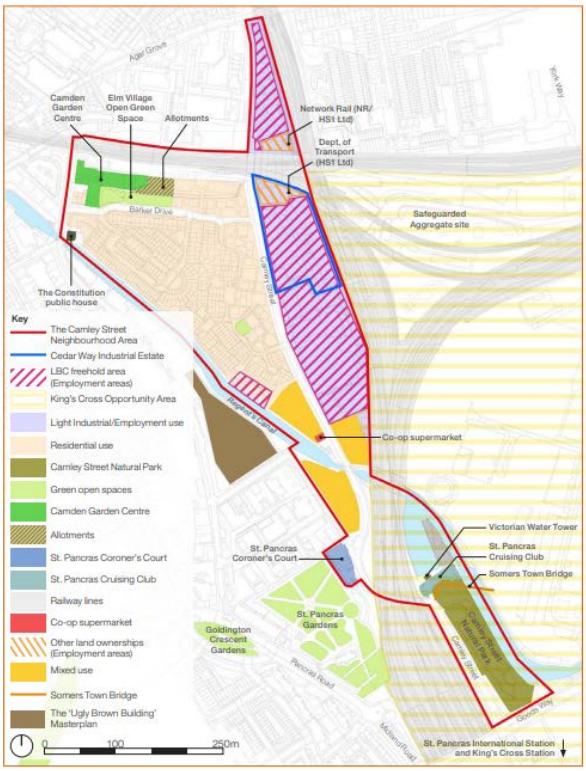


Figure 1 - Extract from the Camley Street Neighbourhood Plan (Cedar Way Industrial Estate, which contains the application site, is shown in blue)

9.10 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.

9.11 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.

9.12 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 'I' at Cedar Way Industrial Estate and 104-114 Camley Street.

- Create a green corridor on Camley Street
- Improve the public realm for walking and cycling
- Provide pedestrian routes through site
- Minimise service points and provide a service street by railway edge
- Provide a connected chain of green and urban spaces
- Explore feasibility of link across railway lines
- Provide crossings over Camley Street
- Enhance Barker Drive for pedestrians

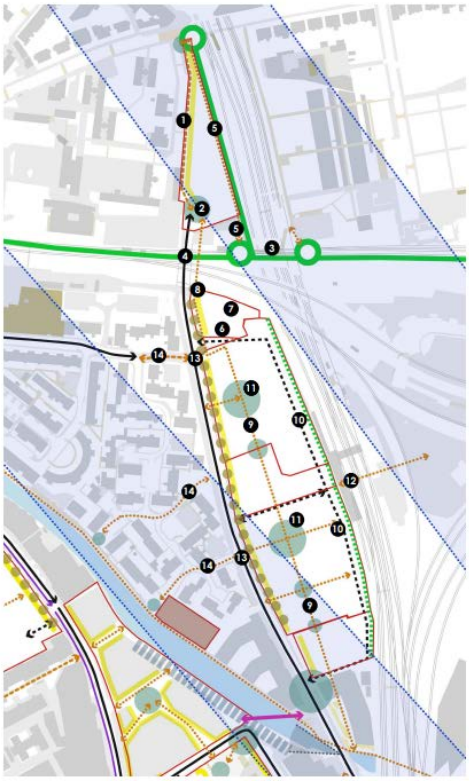


Figure 10 – Image from the CCS SPG Site 'I'

9.13 The site is designated as a site allocation in the emerging draft Local Plan. The site forms proposed site allocation S6 '104-114 Camley Street and Cedar Way Industrial Estate', which is identified for permanent self-contained homes and employment (including research and knowledge uses, light industrial, maker spaces and offices) with an indicative housing capacity of 750 additional self-contained homes across the whole site allocation (for which Site B proposals cover only the northern part).

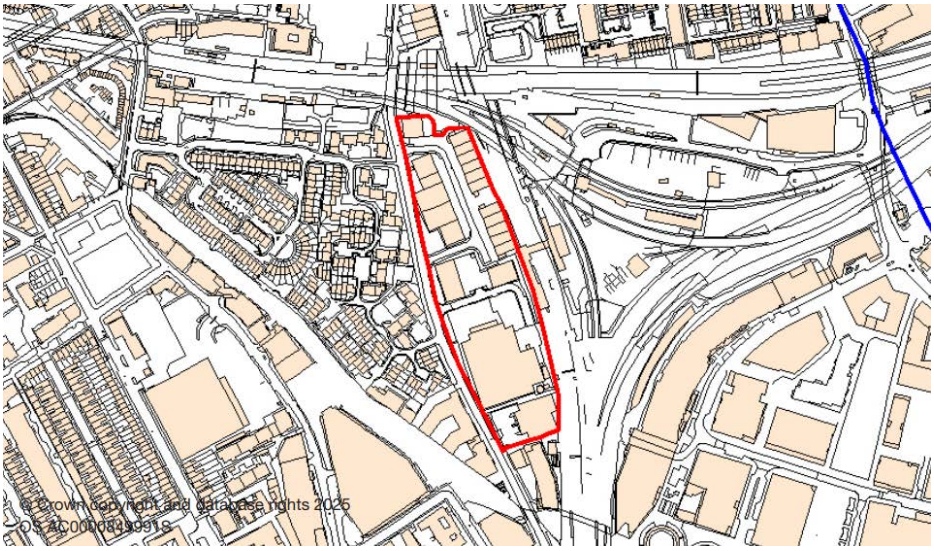


Figure11 - Extract from the Draft Local Plan showing the extent of Site Allocation S6

9.14 The draft site allocation sets out the key development and design principles for development at on the land within S6, 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, potentially assessed with the development of 104-114 Camley Street and Cedar Way Industrial Estate (Site Allocation S6 – which also includes Site B)
- Provide a variety of employment spaces and facilities meeting the needs of existing and future business uses which support the local economy and the CAZ
- 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
- Include free, publicly accessible toilets for a range of users, and free drinking water
- Include wide, tree-lined pavements and active frontages

- Establish new routes and a network of open spaces of different forms and functions including places to relax, play and grow food
- Explore the possibility of east-west connections across the local area
- Enhance the existing SINC to the north
- Consider the impact on the railways and their operations
- Design to avoid impacting the nearby safeguarded aggregates facility
- Contribution towards public realm and connectivity enhancement projects along Camley Street
- Contribute to a new canal crossing

9.15 In addition, the draft site allocation confirms that the Camden Building Heights Study (CBHS, 2024) identified this site as a location where tall buildings may be an appropriate form of development, with 15 to 62 metres considered the potentially appropriate height range outside of the LVMF corridors, and up to 42 metres considered potentially appropriate within those corridors. It also confirms that additional heights may be possible subject to appropriate testing.

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

9.17 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.

9.18 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.

9.19 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 wider, greener and more welcoming.

9.20 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 A on the other side of the railway viaduct 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 B to centre (and Site A to the left).

Figure 12 – Image of the illustraded masterplan for site allocations S5 and S6 plus surrounding areas (Site B in the centre).

9.21 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.

10. LAND USE

10.1 The current uses on the site are as follows:

Existing floorspace

Existing use	**Floorspace (GIA)**
Industrial Storage and Distribution Uses (Use Class B8)	1,284sqm
Commercial, Business and Service Uses (Use Class E)	4,576sqm
Total	**5,860sqm**

10.2 Most of the existing Use Class E activities fall within Use Class E(g)(ii) and (iii) which are for research/development and industrial process activities.

10.3 The proposed floorspace is as follows:

Proposed floorspace

Proposed use	**Floorspace (GIA)**
Commercial, Business and Service Uses – office, research/development and industrial process activities (Use Class E(g))	28,349sqm (49.6%)
Commercial, Business and Service Uses – shop, food/drink activities (Use Class E(a) & (b))	328sqm (0.6%)
Residential (Use Class C3)	28,522sqm (49.9%)
Total	**57,199sqm**

10.4 The development would replace the existing Use Class E(g) floor space albeit in a different typology. The B-class floor space would be removed from site and residential accommodation (including affordable housing) would be introduced. An analysis of the land use changes on site is provided below.

Loss of industrial uses – Class B8

10.5 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.

10.6 The Local Plan states in paragraph 2.69 that the current employment premises in the area 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.

10.7 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.

10.8 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.

10.9 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.

10.10 The emerging site allocation S6 allocates the site for mixed-use development including residential and employment uses such as research and development, 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.

10.11 The site includes several premises currently in storage and distribution use, which are mostly occupied. Storage activities generally require large floor plate premises and high ceilings as well as significant amounts of loading and service space. Whilst it is regrettable that some active businesses will be required to move to alternative premises as the result of this development proposal on Site B, it is considered that there is strong planning policy context for removing these use from the site in order to provide other uses which are in strong demand in this area, including business uses compatible with the Knowledge Quarter and residential accommodation.

10.12 The long-term vision for the Camley Street, as identified by the Local Plan, the draft Local Plan site allocation S6, and the Canalside to Camley Street SPD, is for high density development in this well-connected location. With that in mind, the re-provision of large floorplates, void areas, service yards and vehicle parking areas is not compatible with the stated ambitions for the area.

10.13 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. The existing units, as well as being an inefficient use of a site that is allocated for future mixed-use development in

a location close to public transport connections, public services and jobs, also offer little to the surrounding community in terms of public realm, visual amenity, accessible services and public safety.

10.14 As such, it is considered that removing the industrial uses from the site entirely is acceptable in principle.

10.15 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 storage/distribution uses in general which are space intensive and offer relatively low levels of employment, it is considered that re-providing such uses would fail to optimise the mixed-use development on site, a key requirement of the emerging draft site allocation which has been established through a plan-led process as required by Policy E7 of the Local Plan, by placing significant limitations on the amount and intensity of employment space and housing that could be provided at the site.

10.16 In terms of protecting the interests of existing business, as required by neighbourhood plan policies, the applicant 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.

10.17 Therefore, it is considered that the loss of storage and distribution 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.

Provision of new commercial space – Class E(a)/(b)/(g)

10.18 Policy E2 of the Local Plan seeks a range of business spaces of different sies, types and costs, including for SMEs. Policy E7 of the London Plan states that the intensification of business premises should be encouraged.

10.19 Policy CS EM1 of the CSNP states that development proposals should increase and intensify existing employment areas.

10.20 Site allocation S6 in the draft Local Plan supports research and knowledge-based uses on this site, as well as light industrial and office uses, that support the local economy and the Central Activities Zone.

10.21 It is acknowledged that 4,576sqm of Class E floorspace would be removed from the site. However, this would be replaced with 28,677sqm of Class E floorspace (28,349sqm of Class E(g) space and 328sqm of Class (a)/(b)

space) resulting in a significant uplift on site of 24,101sqm of commercial floorspace. This is supported by policy.

10.22 The proposals would provide a range of flexibly designed Class E commercial floorspace with a much-increased density of occupancy compared to the existing site. The employment generating activities on site would comprise a range of office, research and development and light industrial activities.

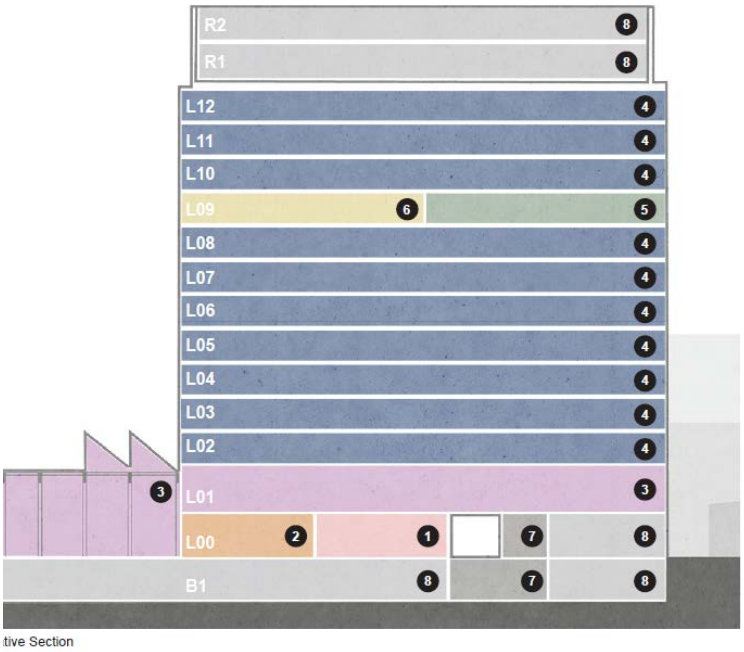


Figure 13 – Illustrative section through main commercial building Block B3 showing the key areas of the reception (1) and mixer (2) spaces, high-tech industrial space (3), lab/office space (4) and co-working/science club space (5 & 6)

10.23 The building aims to establish an innovation 'hub' within the building with a purpose-built innovation ecosystem – infrastructure designed to adapt as sectors evolve, ensuring it remains relevant to the innovation economy of the future. From AI and machine learning groups to biotech, medical robotics, advanced manufacturing, and high-performance computing, the building has been designed to support the full spectrum of innovation activity. It would include adaptable infrastructure and shared technical resources across floors and uses, with sustainable design at its core. It has been designed to provide resilience and future relevance needed ensure occupancy long after construction. These activities would build on and develop the Council's Knowledge Quarter which is already one of Europe's leading locations for tech and innovation businesses.

10.24 Sectors such as life sciences, digital innovation, artificial intelligence and computational science, advanced manufacturing and clean technology are expected to be catered for within Building B3. The building would provide

incubator, ‘grow-on’ and ‘scale-up’ space, with spaces designed to allow a flexible and changeable fit out and to be suitable for start-up businesses and SMEs.

10.25 High-tech light industrial floorspace would be provided on the ground and first floors which will enable testing of innovating practices and products. The mixer space is a dynamic multi-purpose space that should serve the commercial facilities through enabling presentations and showcases but also allowing community access and use through a curated programme of events and exhibitions.

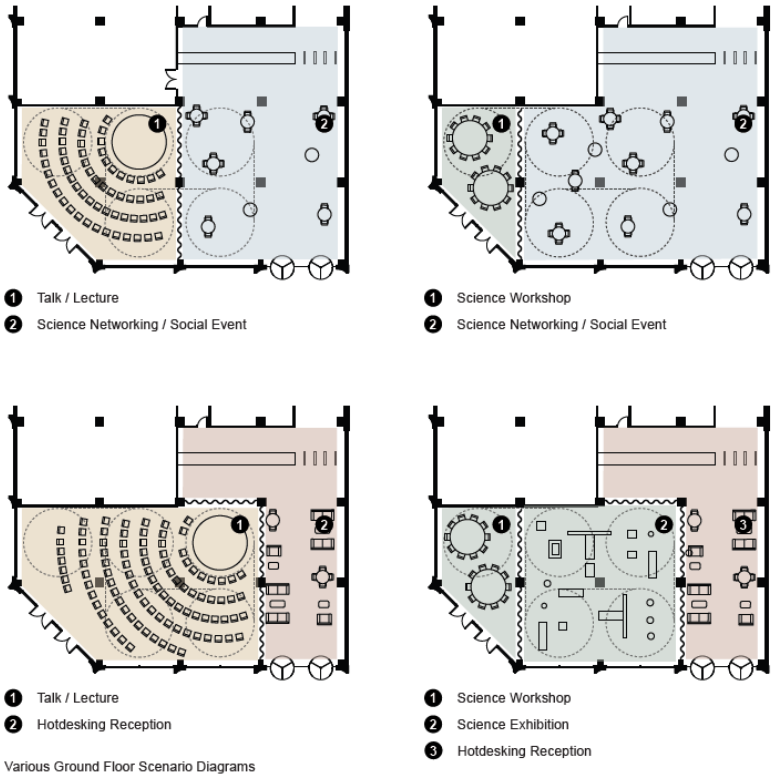


Figure 14 – The mixer space (bottom left corner of each floor plan) is flexible enough to enable a range of activities.

10.26 The ‘science club’ is a flexible lounge area that provides meeting, conference and amenity space (at the level of the external terrace) and co-working areas are accessible to all tenants and guests to facilitate cross-sector collaboration.

10.27 The majority of the building would be provided as flexible science and tech space that can accommodate wet labs and write up space with a flexible range of environmental controls available within it.

10.28 328sqm of retail and/or food/drink space would also be provided within the new development on the ground floor of Block B2, which also helps to activate the ground floor as well as offer services to employees, local residents and passers-by.

10.29 The proposed uses and their quantum have been based on an assessment of workspace needs in the area, including other sites within the Knowledge Quarter, and is also expected to work in tandem with the proposed activities on Site A (affordable makerspace) to create symbiotic benefits for both sites.

10.30 In terms of jobs, the new uses are expected to result in an increase in employment on site, with employment density assumptions as provided by the London Employment Database (2021) estimating 136 employees in the existing units on site and 997 employees in the proposed uses (978 in the Clase E spaces and 19 in the retail and food/drink spaces) which provides an estimated uplift of 861 jobs.

10.31 Therefore, it is considered that the replacement of the existing industrial space with new Class E space for the high-tech and knowledge sectors 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.

Residential use – Class C3

10.32 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, and
- Intensification on other appropriate low-density sites in commercial uses
- Redevelopment of public sector owned sites
- Non-designated industrial sites identified though a plan-led process such as through allocation in a local development plan document
- Policy H4 of the London Plan requires developments on public sector land to deliver at least 50% affordable housing.

10.33 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. Policy H2 requires the supply of self-contained housing from mixed-use schemes to be maximised with a threshold of 50% of all additional floorspace required to be self-contained housing.

10.34 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.

10.35 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.

10.36 The proposed development on Site B includes the provision of 28,522sqm (GIA) of residential floorspace which is 49.9% of the total proposed floorspace on Site B (56% of the uplift in floorspace) and 58% of the total proposed floorspace (64% of the uplift in floorspace) across Sites A & B. This equates to 282 new homes on Site B.

10.37 79 (15% by unit) of the new homes proposed on Site B would be provided in intermediate rent tenure. The rest of the proposed homes on Site B would be for market sale. An assessment of the affordable housing provision is provided in the ‘Affordable housing’ section below. Details of the mix of this accommodation are provided in the ‘Housing mix’ section below.

10.38 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 S6 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.

10.39 The proposed development would deliver a significant amount of housing to help meet the borough’s housing needs. It achieves this by optimising the floor space 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 S6.

10.40 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 56% of the uplift in floorspace as housing which is the highest priority land use. Tenure and unit size mix are dealt with in the 'Affordable housing' and 'Housing mix' sections below.

Conclusion

10.41 The provision of 282 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 57,199sqm of commercial space (an uplift of 51,339sqm) predominantly in the form of a flexible range of high-tech and knowledge economy uses supports the local economy and adequately replaces and intensifies the existing units on site.

10.42 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 S6 of the emerging draft Local Plan.

11. AFFORDABLE HOUSING

Affordable housing requirements

11.1 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.

11.2 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.

11.3 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

11.4 The proposed development on Site B would deliver 79 (28% by unit) of the 282 new homes proposed in intermediate rent tenure. The remaining homes would be for market sale. This is not consistent with the policy requirement for 50% affordable housing on for all developments with capacity for 25 homes or more, as stated in Local Plan policy H4, nor is it compliant with the London Plan policy H4 requirement for 50% affordable housing on public sector land. Furthermore, the Council's guideline tenure split as stated in Local Plan Policy H4 which requires 60% social affordable rent and 40% intermediate rent tenures would not be met.

11.5 However, it is relevant to note that Policy H4 of the Local Plan also states that the Council will ensure that where development proposals are brought forward for closely related sites the appropriate affordable housing contribution will be comprehensively assessed for all the sites together, and that the Council will use planning obligations to ensure that related sites will make an appropriate affordable housing contribution. It is also noted that the draft site allocation s6 (and s5 for Site A) requires development to be brough forward in a comprehensive and co-ordinated way, working jointly with adjoining land and landowners.

11.6 As such, it is considered appropriate in this case to take a multi-site approach to affordable housing, considering the proposals for Site B in tandem with the development proposals at Site A (120-136 Camley Street, planning application ref. 2025/4341/P). This approach also allows for efficient development design so affordable housing can be maximised across both sites.

11.7 Across both sites the total number of homes is 401, with 198 affordable homes provided (49.4%) with a split of 119 social rent homes on Site A and 79 intermediate rent homes on Site B, which is a 60:40 split of social to intermediate rent affordable homes. Taking account of internal floor space (GIA) and habitable rooms, the proportion of affordable housing increases to 50% and 52% respectively. The table below explains the affordable provision and tenure split in detail, across both sites.

Tenure	Homes	GIA	Habitable rooms
Total homes	401	42,449	1,251
Affordable	198	21,103	645
Social rented	119	13,927	446
Intermediate	79	7,176	199
% affordable (total)	49%	50%	52%
Social:Intermediate	60:40	66:34	69:31

Table 1 – Affordable housing and tenure split comparison table across Sites A and B

11.8 The proposed developments at sites A and B are linked through a development agreement and are expected to be delivered at a similar time, and as such it is expected that the affordable housing and tenure split in the table above will be delivered.

11.9 The GLA has been consulted on this application and the application for development on Site A. With regard to the affordable housing the GLA

acknowledge that across the two sites the provision is acceptable and is suitable for following the fast-track route (where no financial viability information is required to be submitted with the application), subject to suitable rent levels for the intermediate accommodation being secured, alongside appropriate mechanisms for delivery of the affordable housing.

11.10 With regard to the delivery mechanism, it is relevant to note that on a site-by-site basis this development proposal is not policy compliant on its own with respect to the proportion and tenure mix of affordable housing. In order to ensure this development proposal contributes adequately to the delivery of affordable social rent housing via the development proposal on Site A a financial contribution will be secured via Section 106 legal agreement. This has been estimated at £35,425,000, which will ensure the proposed development on Site B is policy-compliant with respect to the mix and tenure of affordable housing. This contribution is effectively the payment in lieu (PIL) of social rented housing on Site B, which will be paid to the Council to enable the delivery of such housing on Site A, and will be secured through **s106 legal agreement**.

11.11 The national policy for 25% of affordable housing as First Homes no longer applies. Delivery of First Homes can, however, continue where local planning authorities judge that they meet local need. The Council has adopted a Planning Statement on the Intermediate Housing Strategy and First Homes, which indicates that some affordable housing tenures, including First Homes, would not be affordable to median income residents in Camden, and consequently First Homes and other unaffordable tenures will not be sought in the borough. Any homes delivered as part of the proposal, whether on site, off-site, or through funds arising from PIL and deferred affordable housing contributions, are expected to contribute to the Council's preferred affordable housing types identified by Local Plan Policy H4 and CPG Housing 2021, namely social-affordable or intermediate rented housing.

11.12 Therefore, it is considered that the proposed development is policy-compliant with regard to the on-site affordable housing provision (noting the secured PIL) and would ensure ensure that a comprehensive and co-ordinated multi-site approach to providing policy-compliant affordable housing has been taken across Sites A and B together. As such, the development would be acceptable in terms of its affordable housing provision.

12. HOUSING MIX

12.1 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. The Dwelling Size Priorities Table is reproduced below.

12.2 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.

12.3 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 2 - Camden Local Plan Policy H7 – Dwelling Size Priorities

12.4 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.

12.5 The proposed unit sizes for the affordable, market and total mix of homes proposed on Site B are as follows:

Market Sale Homes 21,458m2 GIA	unit mix	1 Bed Homes 1b2p 77no. 38%	2 Bed Homes 2b3p 15no. 7%	2 Bed Homes 2b4p 74no. 36%	3 Bed Homes 3b6p 37no. 18%	203 Homes
	m4(3)	1 Bed m4(3) 2no.	2 Bed m4(3) 15no.		3 Bed m4(3) 6no.	11%
Intermediate Rent Homes 70,64m2 GIA	unit mix	1 Bed Homes 1b2p 38no. 48%	2 Bed Homes 2b3p 8no. 10%	2 Bed Homes 2b4p 33no. 42%		79 Homes
	m4(3)	1 Bed m4(3) 4no.	2 Bed m4(3) 8no.			15%
Total Site B Homes	unit mix	1 Bed Homes 1b2p 115no. 41%	2 Bed Homes 2b3p 23no. 8%	2 Bed Homes 2b4p 107no. 38%	3 Bed Homes 3b6p 37no. 13%	282 Homes
	m4(3)	1 Bed m4(3) 6no.	2 Bed m4(3) 23no.		3 Bed m4(3) 6no.	12%

Table 3 - Proposed mix of housing on Site B

12.6 Across both Site A and B the housing mix is as follows:

Tenure	1 bed	%	2 bed	%	3 bed	%	4 bed	%
Social rented	25	21%	51	43%	27	23%	16	13%
Intermediate	38	48%	41	52%	0	0	0	0
Market	77	38%	89	44%	37	18%	0	0

Table 4 - Proposed mix of housing across Sites A and B

12.7 The intermediate housing mix responds to the need for relative affordability and therefore the focus has been on providing one and two-bedroom homes on Site B. The Dwelling Size Priorities Table shows that larger intermediate homes are in less demand. As such, all affordable housing of three-bedrooms and greater would be provided as social rent properties on Site A instead, which is more affordable to local families and also in greater demand.

12.8 It is also noted that three-bedroom market properties are in high demand and therefore the provision of 18% of the market homes as three-bedroom properties is also welcomed.

12.9 It is therefore considered that the housing mix is in accordance with the Council's Housing SPD and Local Plan Dwelling Size Priorities.

12.10 Overall, the scheme provides a balanced mix of homes, suitable to the location and contributing to the identified needs in the development plan, in accordance with CLP policy H7.

13. QUALITY OF PROPOSED HOUSING

13.1 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.

13.2 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 A2 encourages opportunities to provide private amenity space which is reflected in a requirement to provide amenity space in LP policy D6. 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 A4 says suitable noise and vibration measures should be incorporated in new noise sensitive development.

13.3 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, also reflected in CLP policies D1, H6, and C6.

13.4 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

13.5 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.

13.6 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 B. 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.

13.7 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 for Site B access to light is very good and better than the overall impact across both developments, where the compliance figure increases to 93% of 573 rooms tested for Building B1 and 79% of 122 rooms tested for Building B2.

13.8 Given the urbanised nature of the local area this is considered a good and acceptable level of daylight overall for the proposed homes on Site B.

Sunlight

13.9 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.

13.10 The proposed buildings have been laid out to minimise the number of windows facing due north. However, in order to create a sizeable and good quality internal open space, as well as responding to the requirement to safeguard space for turning of vehicles accessing the railway to the north (there is a railway access ramp immediately to the north of Site B), the buildings have been designed with a ‘lozenge’ shape that is elongated on a north-south axis. As such, this necessarily limits access to sunlight through the development’s orientation as there are a relatively low number of windows that face due south.

13.11 Of the 282 proposed dwellings on Site B 213 have at least one window facing within 90 degrees of due south (76%). 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.

Of the remaining homes 93% would have at least one room meeting the BRE guidance. 78% of all dwellings on Site B would have BRE-compliant sunlight levels to main living rooms, which is considered to be very good access to sunlight.

Overshadowing

13.12 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

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

13.13 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. All floor plans have eight homes per floor with two residential cores each. All units would be laid out in open plan.

13.14 51% of the dwellings on Site B would have dual aspect. Whilst this is lower than a typical development this is a function of the site layout and housing mix, which has focussed on smaller one and two bedroom units. The ‘lozenge’ shape has less corner plots with two aspects available compared to a squarer floor plan, whilst the smaller units means each of the longer elevations is required to accommodate more units. The development layout has avoided north-facing single-aspect units, which is positive, and all of the three-bedroom units would be dual aspect.

13.15 Both residential buildings would have good quality and well-lit communal entrances, with a unique, characterful and easily identifiable design. Block B1 would accommodate two entrances for intermediate and market sale access to ensure that affordable home services charges are kept as low as possible. The market homes would benefit from a gym and lounge area.

Noise and vibration

13.16 The proposal is for mixed-use development with retail, food/drink, office/lab/tech and light industrial activities all proposed on the site. It is expected that during typical working hours there would be an element of noise associated with these uses, but this would mainly be associated with comings-goings and congregation of people. Noise from the commercial uses is not expected to be significant.

13.17 Surrounding the site there are other activities that could potentially be disturbing to new residents on the site, including noise from moving trains to the north and east of the site, road noise to the west and, further to the east noise and dust from the industrial uses on the safeguarded aggregate site on Freight Lane.

13.18 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.

13.19 As such, the proposed development has been designed to ensure the residential accommodation is well-protected from noise and related disturbances. Balcony and balustrade designs have been integrated that will reduce impacts from 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.

13.20 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 B within the ground floor open spaces, 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.

13.21 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.

13.22 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. Further details of vibration mitigation will be secured by condition.

13.23 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

13.24 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 east of Site B. This facility also manages movement of materials via the railway tracks to the east of Site B.

13.25 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. High quality insulation of the proposed new homes from noise will be secured through conditions.

13.26 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.

13.27 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.

13.28 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

13.29 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 that 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 a similar distance to the concrete batching facilities than the proposed development on Site B 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

13.30 Outlook from all of the proposed homes within the development proposal on Site B would be good. There is a minimum separation distance between existing and proposed buildings of 20 metres which ensures an excellent level of privacy and outlook. The homes would have unobstructed views either onto the local public realm including Camley Street, across the internal open space or across London.

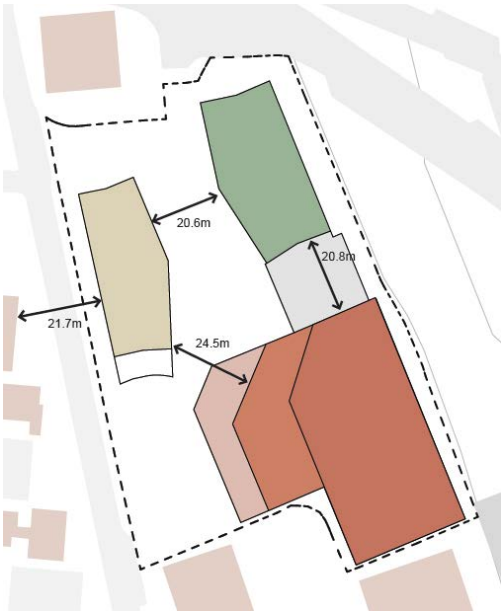


Figure 14 – A minimum of 20m is provided between each building above ground level.

Accessible units

13.31 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).

13.32 35 of the homes within the development on Site B would be M4(3) homes which is 12.4% of the total number of homes on site. These would be provided as M4(3)(2)(a) wheelchair accessible dwellings as is required for intermediate housing by the Housing CPG. Six M4(3) three-person six-bedroom homes would be available within the market sale tenure. All other homes would be provided to the M4(2) standard. Provision of accessible homes will be secured through **s106 legal agreement**.

13.33 Level access will be provided throughout with access between floors possible via wheelchair accessible lifts if required.

Conclusion

13.34 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 **s106 legal agreement.**

13.35 The development would provide accessible flats for all, including an 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.

14. HERITAGE

Legislation and policy context

14.1 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.

14.2 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.

14.3 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.*

14.4 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.*

14.5 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.

14.6 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.

14.7 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.

14.8 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.

Assessment context

14.9 As mentioned above this application for proposed development on Site B (3-30 Cedar Way is being submitted at the same time as development on Site A (120-136 Camley Street). The sites are being brought forward in parallel, to enable a comprehensive and joint assessment of the planning case across both sites. The planning submissions for Site A and Site B comprises two separate planning applications submitted in tandem. This approach has been agreed with both the LPA and GLA part of the pre-application process to enable the planning case to be assessed comprehensively across both sites, including in relation to key matters such as heritage impacts. 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.

14.10 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
St Katharine Danish Church	Designated – GII* 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
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 –	No harm

	GII Listed	
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 6 - Summary of impact on heritage assets

Conservation areas and listed buildings (designated heritage assets)

14.11 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 site. There are designated heritage assets in the surrounding area consisting of conservation areas and listed buildings.

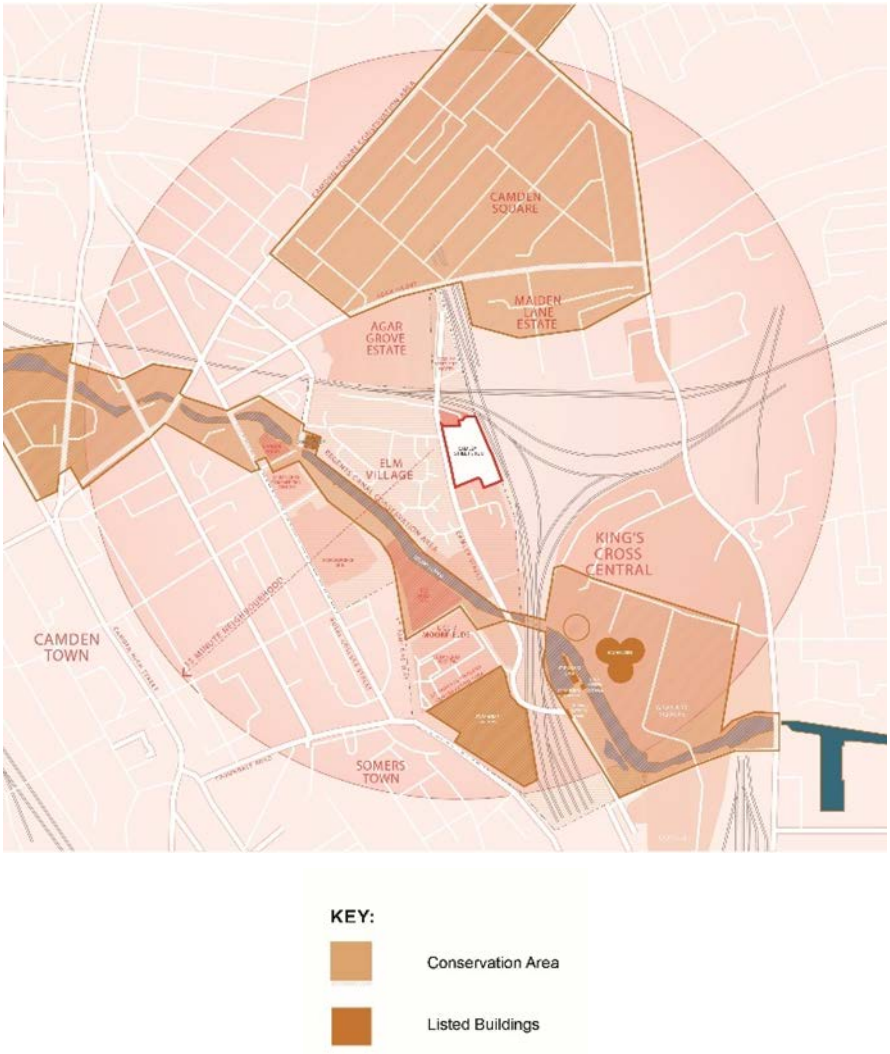


Figure 2 - Map of Conservation Areas and Listed Buildings near Site

14.12 The map above shows the key conservation areas around Site B, along with two listed structures closest to the site. These designated assets are:

- Regent's Canal Conservation Area
- Camden Square Conservation Area
- Cobham Mews studios (Grade II Listed)
- K2 telephone kiosk at junction with Agar Grove

14.13 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.

14.14 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.

All Saints Greek Orthodox Church (Grade I)

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

- Site B: Less than substantial harm (medium)
- Cumulative: No additional harm identified

14.16 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.

14.17 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.

14.18 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 3 – View 7 from St Martin's Close showing both development proposals

Figure 4 - View 8 from Pratt Street (showing both development proposals in wireline form)

14.19 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 church would still momentarily draw the eye, subtly detracting from the setting and heritage value of the listed building.

14.20 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 of the western elevation of the church in the foreground.

14.21 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.

14.22 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.

14.23 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.

14.24 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.

14.25 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.

14.26 In the event that the proposal on Site B is not built out, and only Site A is developed, there would be no harm caused to this heritage asset.

<u>82-90 Pratt Street (Grade II)</u>

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

- Site B: Less than substantial harm (low)
- Cumulative: No additional harm identified

14.28 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 receptors comprises development of different style and scales.

14.29 The proposed developments would introduce a new building of up to 31 storeys to the east of the receptor (Building B1 on Site B) 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 receptor.

14.30 The proposed development would result in a change to the setting of the receptor; however, this would not affect one's ability to appreciate the special interest of the terrace. The strong parapet line of the receptor, 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.

14.31 The setting of the receptor 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.

14.32 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.

<u>Camden Square Conservation Area</u>

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

- Site B: Less than substantial harm (low)
- Cumulative: No additional harm identified

14.34 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. The receptor has a relatively high ability to accommodate the type of change without change to its value.

It is considered that less than substantial degree of harm at the lower 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. 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)

14.35 There would also be less than substantial harm at the lower level of the scale to the setting of the CA due to the proposed development encroaching on the historic skyline above a C19th street, although some recent development outside the conservation area has already harmed this setting. See view 27 below.

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

14.36 Less than substantial degree of harm at a very low level of the scale to the setting of the conservation area would also occur due to the proposed development encroaching on the historic skyline above C19th terraces forming part of the conservation area in wider townscape view. This can be seen in view 26 below, which is noted to be outside of CA. The identified level of harm to this CA would exist if either development proposal on Site A or B, or both schemes, were completed.

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

Regent's Canal Conservation Area

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

- Site B: Less than substantial harm (low)
- Cumulative: No additional harm identified

14.38 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 significance of the conservation area, and the potential impact is derived from the visibility of the proposed development in views looking out of the CA.

14.39 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 conservation area 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.

14.40 It is considered that less than substantial degree of harm at the lower 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 – see view 14 below.

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

Rochester Conservation Area

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

- Site B: Less than substantial harm (very low)
- Cumulative: No additional harm identified

14.42 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.

14.43 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 26 above.

Regent's Park Conservation Area

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

- Site B: Less than substantial harm (low)
- Cumulative: No additional harm identified

14.45 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.

14.46 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.

14.47 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 lower end of that scale.

Figure 23 5 - View 33 from Regent's Park (showing both development proposals in wireline, behind the trees)

Locally listed buildings (non-designated heritage assets)

14.48 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.

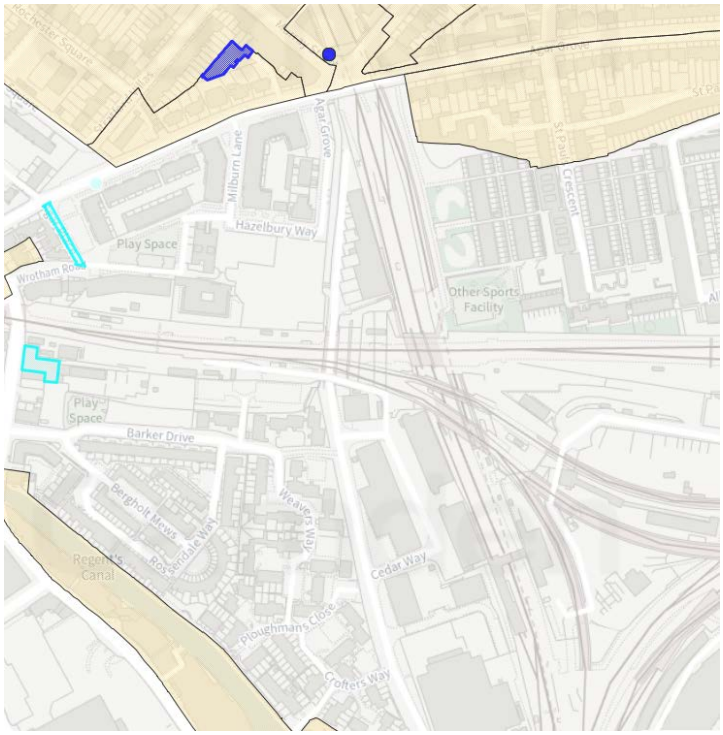


Figure 24 - Map of Locally Listed Builsings near the sites (light blue)

St Martin's Gardens (low)

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

- Site B: Low level of harm
- Cumulative: No additional harm identified

14.50 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.

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)

14.51 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 SPD. 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.

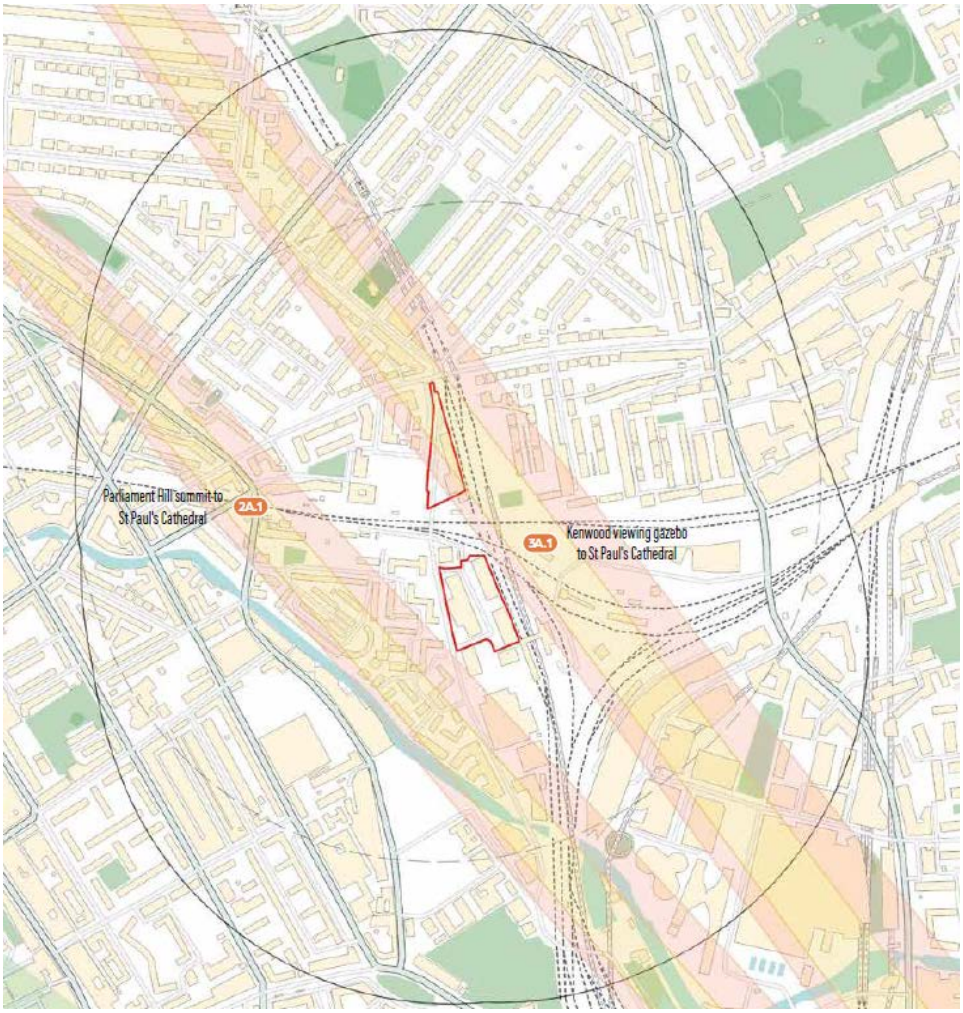


Figure 25 - LVMF views across the sites and local area

14.52 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 266 - LVMF view 2A.1 from Parliament Hill to St Paul's Cathedral (with development proposals on Site A and Site B plus cumulative schemes)

14.53 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 277 - LVMF view 3A.1 from Kenwood House to St Paul's Cathedral (with development proposals on Site A and Site B plus cumulative schemes)

14.54 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.

14.55 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.

14.56 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.

14.57 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.

Archaeology

14.58 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.

14.59 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

14.60 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. Other heritage assets further from the sites will be affected, 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.

14.61 There will be harm 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. 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.

14.62 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 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.

14.63 A low (and very low) level of harm has also been identified to other surrounding designated and non-designated heritage assets as explained in the sections above. With particular reference to the proposed development at Site A, low level of less than substantial harm from this proposal would be caused to the Camden Square Conservation Area only. All other harm to heritage assets would be associated with the proposed development on Site B.

14.64 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.

14.65 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.

14.66 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.

14.67 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.

14.68 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 s106 legal agreement (for Site B).

14.69 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.

15. DESIGN

15.1 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.

15.2 The Canalside to Camley Street Supplementary Planning Document (2021) covers both the Cedar Way Industrial Estate and the HS1 Ltd site, with the application site being a part of this larger project. The planning framework for Cedar Way emphasises "good growth" by promoting the intensive and efficient use of land. This approach aims to provide a mix of high-quality employment spaces and genuinely affordable housing.

15.3 Key policy objectives for these sites include maintaining the area's economic role by providing flexible, well-designed workspaces suitable for light industry, SMEs, and Camden's "Knowledge Quarter" while ensuring new

development is zero-carbon by 2030. A central requirement is to break through the site's current isolation by creating a finer grain of blocks that enhance permeability, specifically through new pedestrian and cycle routes, the establishment of a commercial service street along the eastern railway edge to consolidate vehicle access, and the maintenance of critical rail access rights for the HS1 compound. Furthermore, the development must reinforce Camley Street as a green spine by providing a chain of public open spaces and urban greening, while adopting a sensitive design approach, informed by local views and the low-rise character of neighbouring Elm Village, to mitigate overshadowing and preserve the setting of nearby heritage assets.

15.4 Site Allocation S6 of the emerging draft Local Plan: 104 – 114 Camley Street and Cedar Way Industrial Estate designates the 2.5-hectare site for a transformative mixed-use development comprising approximately 750 additional self-contained homes and intensified employment floorspace, including light industrial, maker spaces, and research-based uses. Policy requires a comprehensive and coordinated approach between landowners to ensure new building typologies successfully co-locate residential and industrial uses without compromising existing business operations, while adhering to the "Agent of Change" principle regarding noise and air quality.

15.5 The site is identified as suitable for tall buildings ranging from 15m to 62m outside the London View Management Framework (LVMF) viewing corridor and 15m – 45m inside the LVMF viewing corridor, all proposals must respect the London View Management Framework (LVMF) corridors, incorporate urban greening to strengthen Camley Street as a walking and cycling route, and ensure no prejudice is caused to the continued operation of the adjacent railway and aggregates transhipment facility.

15.6 The Camden Building Heights Study identified this site as a location where tall buildings may be an appropriate form of development, with 12m - 40m considered the potentially appropriate height range. Additional height, above the indicative 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.

Site location and surrounding townscape

15.7 The site is a generally rectangular site situated between the residential neighbourhood of Elm Village to the west, Agar Grove to the north and extensive rail corridors to the north and east. Positioned on either side of Cedar Way, the site is accessed via Camley Street, a key north-south artery connecting the area to King’s Cross and Agar Grove. The site’s character is heavily influenced by its proximity to rail corridors, with the urban grain of the surrounding area reflecting a mix of established low-density residential areas and functional industrial land.

15.8 The site comprises 5,860m² (GIA) of industrial floorspace across single and double-storey units. The existing yard is utilised for parking, and a critical Network Rail access route serving the HS1 compound and a gated railway ramp that must be maintained. The site's character is defined by its industrial history and proximity to active rail lines and a concrete plant, which present a 24-hour noise environment.

15.9 The wider townscape is defined by a striking contrast in scale and character, ranging from established residential neighbourhoods to major regeneration zones. To the north and west, the urban grain is primarily low-to-mid rise, with the linear terraces of Camden Town and the orthogonal streets of the Maiden Lane Estate sitting at 3 to 5 storeys. The southern and eastern skylines are dominated by the significant intensification of the King's Cross Regeneration area, where commercial and residential buildings reach up to 27 storeys. Today, the area is increasingly defined by the mature London Plane trees along Camley Street, which acts as a green spine connecting historic open spaces like St Pancras Gardens and Camden Square Gardens to the north.

Site appraisal and opportunity

15.10 A current feature of this site is its isolated nature; it remains disconnected from its established residential neighbours and suffers from rail severance to the north and east. The site also has a poor visual permeability and an industrial layout dominated by low-rise warehouses and hardstanding for vehicle parking. Significant constraints include the necessity to maintain critical Network Rail access to the HS1 compound and the gated railway ramp, alongside the challenges posed by 24-hour noise potential from the adjacent rail corridor and concrete plant. This inefficient use of such a strategically located site results in the current industrial uses being poorly integrated with the surrounding grain of Elm Village and the wider King's Cross area.

15.11 The redevelopment of the Cedar Way site offers a fundamental opportunity to transition from an isolated industrial estate to a permeable, high-density neighbourhood. This transformation provides the opportunity to:

- Provide an environmentally responsible, zero-carbon development that intensifies employment use alongside the delivery of new homes.
- Improve the relationship with the surrounding area by creating a finer grain of blocks and positive frontages.
- Strengthen Camley Street as a green spine through widened footways, extensive street tree planting, and urban greening.
- Establish a series of linked, publicly accessible green spaces and a network of integrated routes that enhance local biodiversity.
- Unlock east-west connectivity, creating safer and more welcoming routes between the site, and the Regent's Canal Towpath.

- Provide a variety of flexible employment spaces that cater to both existing business uses and the emerging knowledge economy, ensuring long-term social and economic sustainability.

Overall design concept and typology

15.12 The proposed design concept is anchored by the Camley Street Spine, a strategic architectural framework intended to transform the currently insular Cedar Way Industrial Estate into a permeable, mixed-use urban quarter. Given the proposed site's significant density and height, which exceeds the prevailing low-rise context of Elm Village, the proposal relies upon a mixed use residential, high-tech light Industrial, and science & technology office typology. This approach co-locates specialised laboratories and light-industrial maker spaces on the lower levels, with high-density residential and commercial employment uses above.

Layout

15.13 The proposed layout comprises three buildings and two linked areas of public space. Blocks B1 and B3 are adjacent to the railway, and block B2 addresses Camley Street. Blocks B1 and B2 are predominantly residential and Block B3 proposes life science accommodation. The proposed layout departs from the existing cul-de-sac industrial layout, introducing a finer pattern of development that enhances permeability through the site. Buildings are pulled back from the western boundary to facilitate a widened public realm along Camley Street. Meanwhile, the southern boundary utilises a stepped profile to respect the daylight requirements of adjacent plots.

15.14 Industrial and lab uses are consolidated at the ground and mezzanine levels to activate the street. Residential and office lobbies are strategically located at the corners of new public squares to maximise natural surveillance. While pedestrian and cycle access is prioritised through the new Camley Square and heavy vehicle servicing and the essential HS1 compound access are discreetly relegated to the eastern boundary adjacent to the rail tracks.

Public realm/Landscape

15.15 The proposed landscaping scheme for Site B establishes a cohesive public realm centred around the 'Camley Street Spine' principle, creating a strong green link between the Agar Grove and Elm Village neighbourhoods. The strategy incorporates a series of interlocking spaces that celebrate nature while providing functional areas for residents, workers, and the wider community. Soft landscaping across the site includes extensive street tree planting, rain gardens, and a woodland-style courtyard, which collectively provide significant aesthetic and biodiversity enhancements.

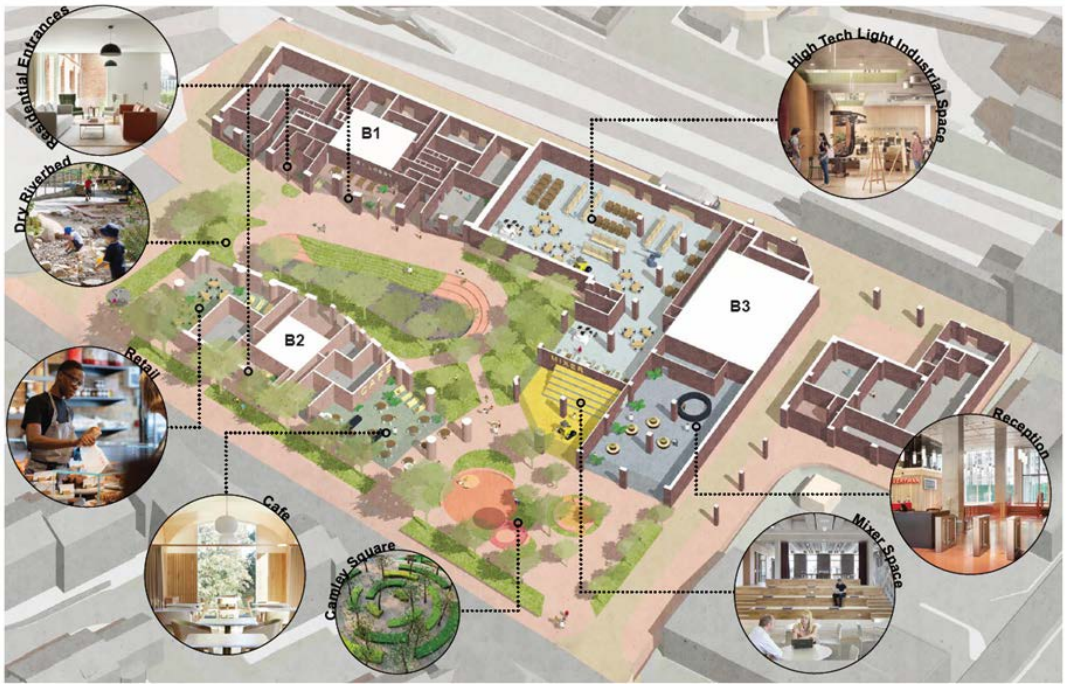

Residential Entrances
Dry Riverbed
Retail
Cafe
Campus Square
B1
B2
B3
High Tech Light Industrial Space
Reception
Mixer Space

Figure 28 - Site B ground floor plan diagram

15.16 The landscape strategy delivers an Urban Greening Factor (UGF) of 0.34, transforming the site's hardstanding into a series of green spaces. The proposal centres on Camley Square and Courtyard Garden, with Barker Yard and Linear Garden framing the B2 building. Play areas are situated within all proposed green and civic spaces. This green infrastructure ensures the development appears as a porous, welcoming destination rather than an isolated community. Camley Street (Fig. 29) serves as the primary movement corridor and western edge of the site, featuring widened footways and integrated play on the way elements to encourage active travel. To the north, Barker Yard functions as a dual-purpose gateway; it balances essential servicing and Network Rail access with public amenities, including a retail breakout space, a water fountain, and a sustainable drainage (SuDS) swale.

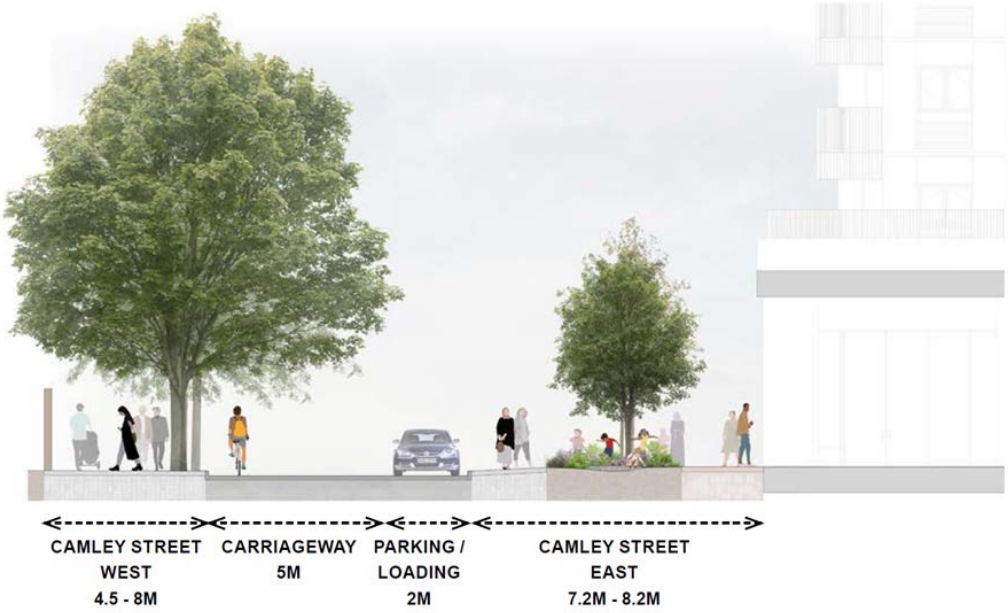


Figure 29 - Camley Street widened corridor

15.17 The centre of the development is the Courtyard Garden, a semi-public green space located between residential blocks B1 and B2. Designed as a woodland retreat, it offers doorstep play and quiet seating areas framed by groves of multi-stem trees. A central feature of this courtyard is the Dry River Bed (Fig. 30) a visible SuDS element that replaces traditional underground attenuation. This feature includes planted banks, river pebbles, and sandstone boulders with a water pump to encourage playful interaction with nature.

Figure 30 - Courtyard Graden section

15.18 Camley Square provides a flexible, civic-focused open space at the southern end of the site, framed by retail and science-related active frontages. The square includes a science-themed water play (Fig. 31), and an outdoor classroom. Orchard trees are also proposed here as a reference to local permaculture, further enriching the site's ecological and social value.

Figure 31 - Camley Square Section

15.19 Barker Yard is designed as a high-quality gateway that successfully balances technical site requirements with a welcoming public realm. Its design quality is defined by the integration of sustainable drainage swales (Fig. 32) and soft landscaping, which soften the character of the adjacent railway compound and Network Rail access while providing a functional and aesthetically pleasing transition for pedestrians and cyclists entering the site from the north.

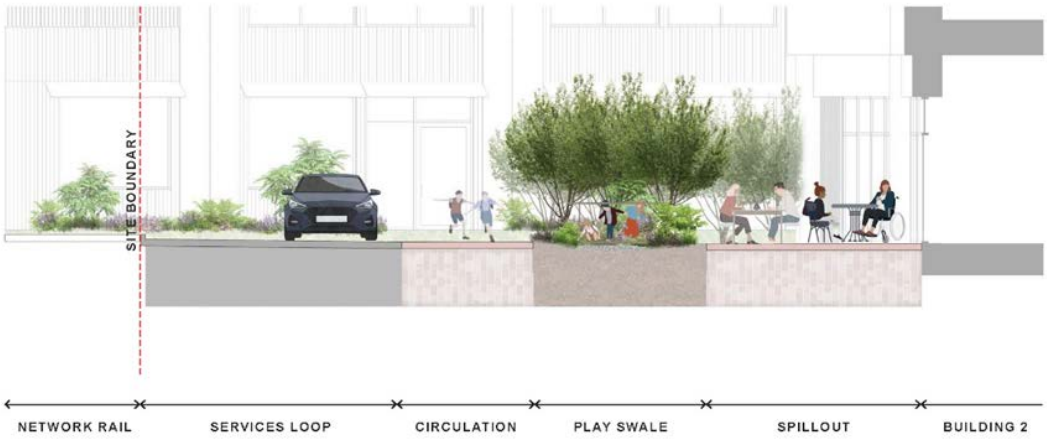


Figure 32 - Baker Yard Section

15.20 Overall, the hard and soft landscaping proposals are considered to provide substantial public benefits by improving local connectivity and creating high-quality, inclusive open spaces. Appropriate conditions will be attached to any approval to secure the delivery and ongoing maintenance of these landscape areas.

15.21 The development uses its roofscapes to maximise sustainability and biodiversity. Non-accessible biosolar roofs are proposed across multiple levels, combining solar energy generation with habitat features such as log piles, bee bricks, and insect hotels. Additionally, a blue roof on Level 2 of the

science and technology building will provide on-site water attenuation and ecological value through climate-adapted planting.

Scale and massing

15.22 The development uses a tiered massing strategy, with building heights varied significantly to optimise site capacity within a Camden-designated tall building zone. This approach ensures a transition between the high-density proposals and the lower-rise context of the surrounding area, creating a balanced urban grain that responds to its specific city-fringe location. 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.

15.23 Block B1 serves as the development's primary landmark, reaching a height of 108m, equivalent to 31 storeys. It is strategically positioned at the north-eastern corner of the site to maximise the physical distance between the tallest element and the lower-rise residential context of Elm Village. This location is further dictated by the London View Management Framework, as the tower is placed to avoid encroachment into protected viewing corridors. In accordance with Policy D9 of the London Plan, Block B1 is designed to enhance urban legibility and wayfinding, using a slender profile to provide high-quality residential accommodation while mitigating visual bulk on the skyline and respecting the integrity of protected vistas.

15.24 Intermediate massing is provided by Blocks B2 and B3, which serve to mediate the scale across the site. Block B2 stands at 33m, or 9 storeys, and is designed at a human scale to transition the development's height down toward the street level. This massing remains intentionally subordinate to Blocks B1 and B3 to ensure a varied skyline that respects local building heights. Block B3, reaching 68m or 13 storeys, acts as a mid-rise anchor between the landmark B1 tower and the lower B2 block. Its height is carefully designed to balance density with the necessity of protecting the amenity and daylight access of neighbouring residential properties.

15.25 The massing of B3 is heavily articulated through the use of chamfers and setbacks to improve the quality of the built environment. Specifically, the north-western chamfers are engineered to track sunlight into the central courtyard and mitigate the sense of enclosure for residents in Block B2. This design-led approach prioritises natural surveillance of communal play spaces and supports the delivery of dual-aspect layouts. In addition, the roofscapes include integrated plant enclosures screened by louvres to prevent a monolithic appearance from distant views, ensuring the development remains sensitive to nearby heritage assets.

Figure 33 - Diagram showing chamfers and setbacks of the proposed blocks

Appearance and architectural language

15.26 The design of the building elevations for all blocks is structured around a plinth at the base, a body in the middle, and a crown at the top (Fig. 34). These plinths are strategically projected in key locations to enhance the active storefronts and enliven the public spaces along Camley Street and the new squares. The ground floor features larger glazed openings that showcase the active maker spaces and laboratories inside, while high-quality metal privacy screens help manage the interaction between industrial activities and the pedestrian environment.

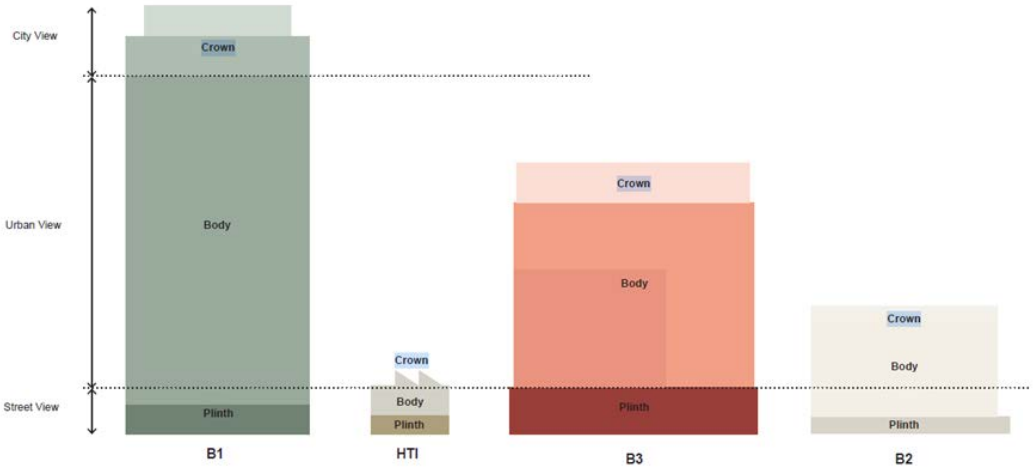


Figure 34 - Proposed building datums and tonal composition

15.27 The architectural design employs a grid-based approach for the proposed B1, B2, and B3 blocks. The main façades present a repetitive pattern of vertical and horizontal piers.

15.28 All plant enclosures at the roofline are integrated into the crowns of the building, screened by louvred panels that match the primary grid to ensure an articulated silhouette.

15.29 The proposed different block colour tonality split brings a dynamic design approach to the site and surrounding area (Fig. 34). However, the final toning and colour scheme will be secured at a later stage to ensure final high quality, given the prominence of these buildings.

15.30 To mitigate the perceived mass, the design of the B2 block provides a strong, defined street edge along Camley Street. The quality of the B2 block typology must be upheld through strict adherence to the architectural language and quality; any dilution of the design intent would undermine the justification for the development's scale. Equally, blocks B1 and B3 must showcase an exceptional standard of design and execution to justify their prominence within the masterplan. As the B1 residential tower and B3 employment building serve as significant visual markers, it is essential that their materiality and technical detailing, specifically the depth of the window reveals and the consistency of the grid-led façade, are delivered to a premium standard. Any reduction in the quality of these blocks would negatively impact the coherence of the "Family of Buildings" concept and the overall successful integration of the site into its surrounding context.

B1 block

15.31 Block B1 is a 31 storey residential tower. It's form has been designed with a North/South inflexion and mirrored floorplates. This subtle twist in the orthogonal plan provides a dynamic silhouette from key viewpoints. To address the Higher Risk Building (HRB) requirements, the massing has been

strategically split from Block B3 to ensure clear residential legibility and improved fire safety.

15.32 A notable architectural feature is the angled pilasters on the B1 block (Fig. 35). These vertical piers have chamfered edges, which are mirrored in the geometry of the integrated balconies. This design creates a richly textured, sculpted elevation that enhances visual interest while minimising the perceived scale of the building.

Figure 35 - The south-west elevation of B1, showing the precast concrete vertical pilasters

15.33 The proposed window reveals, and composite windows with shading canopies (Fig. 36) offer natural shading and create a dynamic interplay of light and shadow across the building's facade, setting it apart from typical residential cladding. Additionally, the arrangement and depth of the balconies contribute to the building's environmental strategy by providing passive shading for the internal living spaces, which helps reduce solar heat gain.

Figure 36 - Close up bay detail of block B1

15.34 Block B1 establishes a clear and legible hierarchy of entrances that respond to the building's varying tenures and the surrounding public realm. The

market sale entrance (Fig.37) is strategically positioned at the building's apex, acting as a focal point that fronts onto the Courtyard Garden. It features a distinguished two-storey plinth of precast concrete, with a deep lintel that helps signify a clear point of arrival. In contrast, the intermediate rent entrance (Fig. 37) is located on the north-west flank of the building with high visibility from Barker Yard, adding street presence between the market entrance and the bicycle store. All primary residential entrances contribute to passive surveillance over the central courtyard and surrounding pedestrian routes, ensuring a safe and welcoming environment throughout the day and night.

Figure 37 - Intermediate entrance (left) and market sale entrance (right)

15.35 The tower's tonal design features pale, acid-etched pre-cast concrete, mid green metal spandrel panels, mid-green metal balcony dividers and dark green coloured metalwork.

15.36 The boundary between the B1 residential lobby and the public realm is managed through high-quality landscaping. The courtyard garden and dry river bed provide a soft buffer and ensure that B1 maintains the privacy and safety required for high-density residential living.

15.37 The B2 block establishes a strong, defined street edge along Camley Street. Its architectural expression is designed to transition from the new development into the existing neighbourhood grain.

15.38 The architectural language of the B2 block is a grid-based system that reflects the other blocks within the site B development. The building is wrapped in a repetitive grid of vertical pilasters and horizontal string courses, providing a sense of order. The design incorporates deep window reveals, which serve both an aesthetic and functional purpose, creating strong shadow lines while providing natural solar shading. A defining feature of the block is the rounded pilaster detail to ground level (Fig. 37). This creates a

sculpted, three-dimensional texture that provides visual interest and breaks down the scale of the façade.

Figure 38 - Block B2 west elevation facing Camley Street with a plinth bay detail to the ground floor

15.39 The residential entrance for Block B2 (Fig. 37) is designed as a prominent marker along Camley Street, defined by a distinctive scooped precast concrete balcony typology overhead. This sculptural gesture creates a generous, sheltered canopy that signifies the threshold between the public realm and the private residences, while integrating with the building's material palette.

15.40 The B2 block balcony design features projecting, paired inset, corner and scooped balcony typologies. The projecting balconies are strategically positioned to animate the facade and provide residents with outward views over the tree-lined Camley Street. Beyond providing private amenity space, these balconies offer passive solar shading to the apartments below, helping to manage internal thermal comfort. Crafted from precast concrete, the scooped balconies are integrated into the lower levels of the building, specifically above the main residential entrance on Camley Street. The paired inset apex and corner balconies inflect and follow the B2 block building form while contributing to the verticality and texture of the building's exterior.

15.41 The design features a precast concrete base with a textured brick body and crown (Fig. 38), including brick patterns on the spandrel panels and crown. Integrated balconies and privacy screens feature high-grade metalwork in a bronze-toned or anodised finish, ensuring that material aesthetic is consistent across the "Family of Buildings."

Figure 39 - B2 block typical window spandrel and crown detail (recessed alternating wite brick courses)

15.42 The materiality of Block B2 is defined by a high-quality palette of precast concrete and masonry, characterised by deep window reveals and intricate metalwork details. These elements are designed to create a sense of permanence and architectural depth that complements the industrial heritage of Camley Street while maintaining a cohesive visual language with the other blocks in the Site B family. The use of robust, tactile materials is central to the scheme's success, ensuring that the building ages gracefully and maintains its aesthetic integrity within a high-traffic urban environment.

15.43 The specific selection of masonry tones and the precast components are crucial to breaking down the massing and providing a human scale at street level. High-quality finishes are essential to the design rationale for the building's density and scale. This development creates a strong sense of place and character.

15.44 Given the importance of these finishes to the overall architectural language and the heritage context, it is recommended that full material specifications, including 1:1 mock-ups of key junctions and cladding panels, be secured via

planning condition. This ensures that the high standard of design intent demonstrated at the application stage is fully realised during the construction phase, preventing any value engineering that could compromise the visual or structural quality of the development.

B3 block

B3, consistent with the other blocks in the family, features a grid of vertical pilasters and horizontal string courses and spandrel panels (Fig. 40). A key architectural detail is the rounded scooped-angle pilaster, which adds depth to the facade. The deep window reveals, measuring 500mm from the protruding lintel above (Fig. 40), provide natural self-shading and create strong shadows, enhancing the sculptural quality of the building's exterior.

Figure 40 - Block B3 west elevation facing Camley Street

15.45 The horizontal expression of the coloured and textured spandrel panels (Fig. 40) adds a rhythm to the facade composition and is detailed to subtly demarcate the floor levels, creating a clear and ordered grid. This interface between the robust pier elements and the textured spandrels ensures a high-quality, durable exterior.

15.46 Block B3 is envisioned as a next generation innovation hub, designed to be adaptable in a shifting economic landscape by providing highly flexible employment space. Its form is defined by a primary grid that responds to the internal requirements for laboratory and high-tech industrial use while maintaining a cohesive visual relationship with the residential blocks, B1 and B2.

15.47 The building's façade has been designed to meet strict environmental performance standards. The ratios of glazing and shading elements are customised for each elevation according to solar exposure in order to limit solar heat gain and reduce reliance on mechanical cooling. For instance, the south façade features a solid design to minimise heat exposure.

15.48 Additionally, the building incorporates an adaptable façade with interchangeable glazed and louvred panels (Fig. 41), allowing it to address the specific ventilation and daylighting needs of various tenants, including offices, laboratories, and high-performance computing facilities. This modular approach ensures that the technical requirements for air handling and cooling are satisfied while maintaining a consistent and high-quality architectural appearance.

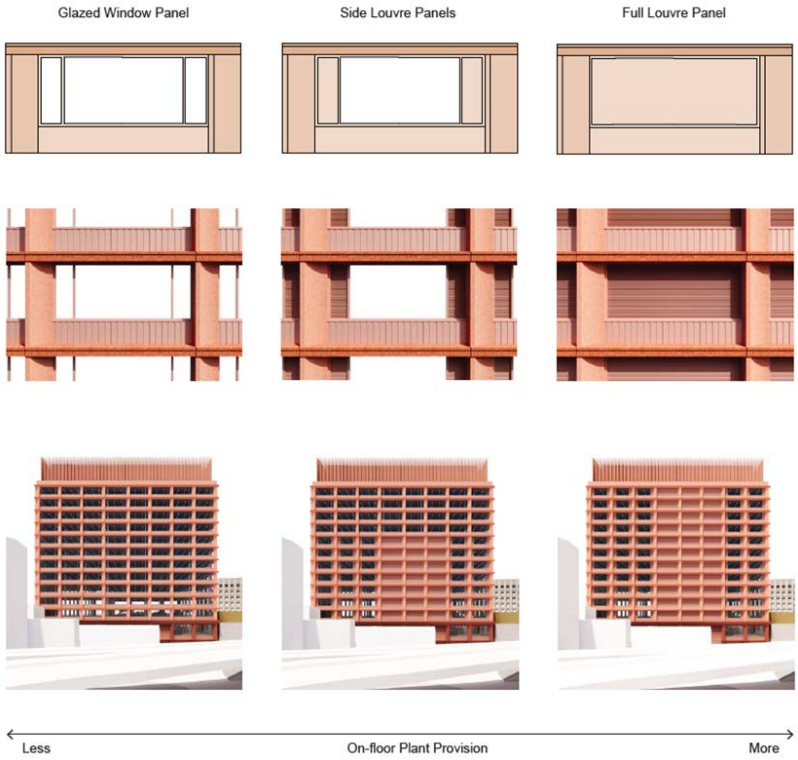


Figure 41 - B3 block louvre panel strategy

15.49 The east facade, which faces the open railway, is designed to accommodate these technical spaces, featuring a louvred façade that enables enhanced ventilation while maintaining the building's aesthetic integrity.

Figure 42 - B3 building (left) and Mixer Space (right) entrances

15.50 The ground floor of B3 is articulated to manage the interface between public pedestrian movement and sensitive light industrial activity. The primary B3 entrance (Fig.42) to the sci-tech spaces is located off the new public squares, designed with large glazed openings to address the widened pavement and animate the public realm. The ground floor also houses "Mixer" entrance (Fig. 42) to High-Tech Light Industrial uses, which require a level of privacy. The façade in these locations features privacy screens that tenants can open or close, allowing for a balance between visual interest for the public and the concealment of potentially sensitive internal works.

15.51 The B3 block is supported by a car-free strategy that prioritises active travel. It includes secure cycle facilities and end-of-trip facilities for employees. Specialist Sci-Tech deliveries and servicing are managed through a dedicated area accessed from Camley Street, with plant and refuse spaces tucked away to the back of the building to avoid detracting from the primary pedestrian spaces.

HTI block

The High-Tech Light Industrial (HTI) block is defined by its dual role as a highly functional workspace and a visual backdrop to the woodland garden. This front elevation (Fig. 43) addresses the public spaces, while the highly functional rear elevation is accessed from the service road adjacent to the railway side. It is facilitating logistics and technical operations.

Figure 43 - HTI block west elevation

15.52 Unlike the highly glazed residential and office blocks, the HTI space adopts a more solid architectural language to accommodate specialised work. The solidity of the HTI block is intended to act as a calm, robust backdrop to the lush, green garden courtyard.

15.53 To cater to a multitude of occupant types, the HTI units feature generous double-height spaces with clear heights of up to 9.6m. This requirement for significant height is accommodated centrally within the masterplan, occupying the space between the main body of the B3 science building and the B1 residential tower.

15.54 While functional, the HTI component remains part of the site B family of buildings and adheres to the same high-quality material standards (Fig. 20). The block is grounded by a robust plinth that integrates with the site's level changes and the service road infrastructure.

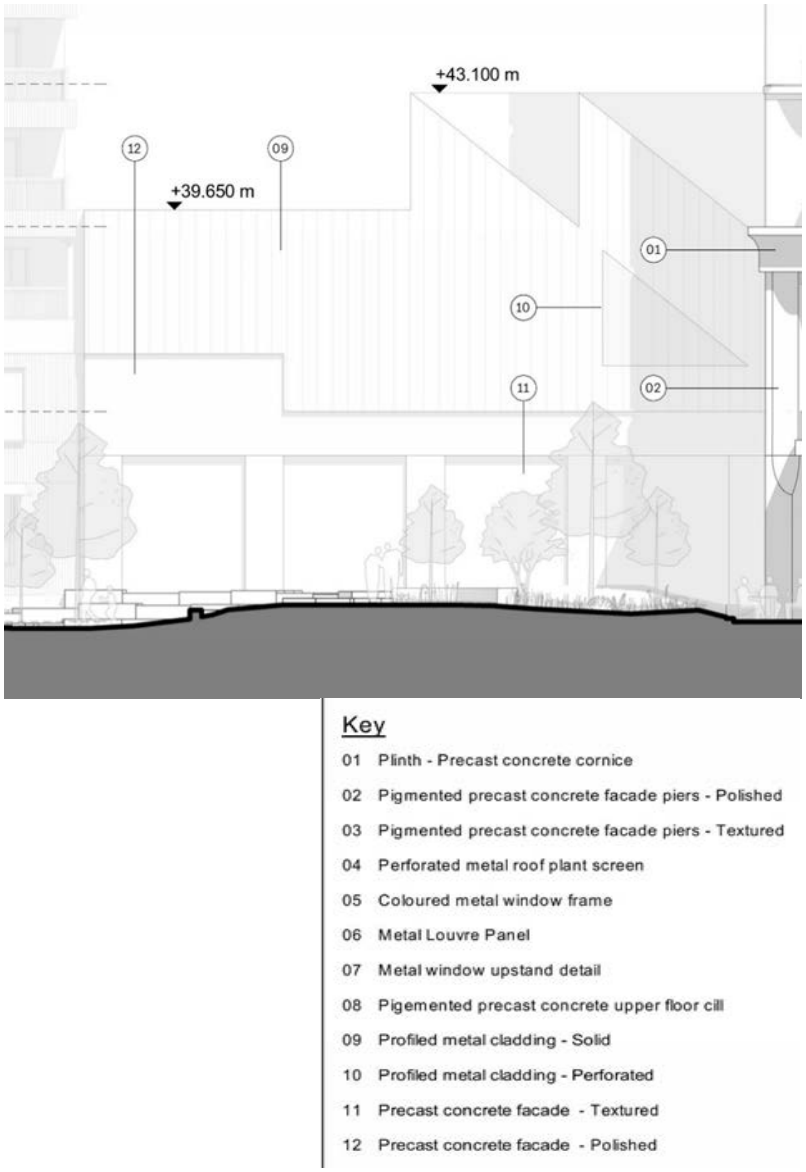


Figure 44 - HTI building west elevation material palette

Detailing and materials

15.55 To justify the density of the development, the architectural quality, detailing and materials must be of exceptional quality in all proposed buildings and the public realm. The Council will require full conditioning of all external finishes to ensure the design intent is realised. The palette must consist of high-tone, textured brickwork and acid-etched precast concrete, resisting the use of standard "thin" cladding systems in favour of robust, durable materials that reflect a sense of permanence. The design quality of this scheme is the primary mitigation for its height and density; therefore, it is essential that the angled pilaster and balcony detailing, along with the high-spec material palette, are fully secured.

15.56 Furthermore, the final specifications of these external finishes, including precise mortar profiles, brick bonds, and metalwork coatings, must be

formally submitted and approved during the implementation stage. To guarantee the premium execution required for this strategic growth area, any substitution of the architectural team or materials that compromises these standards will be resisted, with the final quality being verified through the site-based review of large-scale material mock-ups.

Camden Design Review Panel (DRP)

15.57 Throughout the pre-application process, the scheme has undergone several iterations in response to comments by Officers and the Camden Design Review Panel (DRP) to arrive at the current proposals for the site.

15.58 The scheme was presented to the DRP for a Full Review on 11 April 2025 to seek the panel's views on the overall masterplan, the integration of employment and residential uses, and the quality of the public realm. At this review, the Panel commented:

- The panel welcomes the "Family of Buildings" concept and the design team's response to the site's industrial heritage, but emphasises that the success of the high-density proposal is entirely dependent on the delivery of exceptional architectural quality and material durability.
- The panel supports the "Sci-Tech" hybrid typology and the colocation of life sciences with residential uses, though it notes that the complex servicing requirements must not compromise the quality of the pedestrian environment.
- The panel encourages further generosity to Camley Street. It welcomes the setback of Block B2 to increase pavement width, which helps to reinforce the "Camley Street Spine" and improve the arrival experience.
- The refinement of the two residential buildings with North/South inflections and mirrored floorplates is supported as a means of providing architectural character and optimising internal layouts.
- The panel welcomes the 'pulling out' of building plinths as a strategy to mitigate wind impact on the public realm and to maximise active frontages along Camley Street.
- The identification of distinct character spaces within the public realm is a positive development. The panel specifically supports the creation of a "sunny civic square" contrasted with a more "shady river bed" designed for play, referencing the site's proximity to the Regent's Canal.
- The panel notes the requirement to address Higher Risk Building (HRB) legislation and supports the splitting of Blocks B1 and B3 into independent volumes to improve safety and residential legibility.
- Concerns remain regarding the "woodland garden" and boardwalk. The panel suggests that dense planting and the boardwalk structure may feel inaccessible or unsafe after dark; this route to the residential lobbies requires careful refinement to ensure it is welcoming.
- The panel feels that the looped service road and the interface with the railway ramp need further thought to ensure vehicle movements are

efficient and do not detract from the character of the newly created public spaces.

15.59 Following this feedback, the applicant's design team has further refined the "Family of Buildings" approach between November 2024 and February 2025. Footprints have been rationalised for greater efficiency, and the "river bed" play space has been developed with a richer narrative referencing biology and the natural environment to align with the science-led nature of the employment space. The building lines have been further adjusted to ensure the public realm feels safe and generous. Officers are satisfied that the landscape design iterations provide a sufficient response to the core objectives of the DRP.

15.60 DRP reviewed the two schemes again on 13th June 2025 and concluded:

- The composition of blocks on Site B has improved significantly since the last review, and the buildings now work well together.
- The crown of Block B1 could be more vertically expressed to reduce bulk, and the eastern façade inflected to provide visual relief.
- Block B2 needs further work to develop a stronger identity, with a clearer logic.
- The design of Block B3 is strongly supported.
- Landscape designs are impressive, and the panel supports the concept.

Conclusion

15.61 The overall design 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 meets the requirements of policy for the uses on site and the aspirations for high quality design and public realm. It is of utmost importance to secure high-quality materials and detailing through planning conditions and retention of the project architect. It is therefore considered the proposed scheme is acceptable in design terms.

16. IMPACT ON NEIGHBOURING AMENITY

16.1 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.

16.2 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

16.3 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.

16.4 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.

16.5 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

16.6 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.

- 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.

16.7 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, the development of Site B only and the development of both sites, in accordance with the submitted proposals.

16.8 Below will primarily consider the potential cumulative impacts from the potential future development of both Site A and Site B, as this is the potential 'worst-case' scenario 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

16.9 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	Minor Negative	Moderate Negative	Major Negative

Table 7 - Impact significance criteria

16.10 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.

16.11 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.*

16.12 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

16.13 The summary below includes figures for both proposed developments at Site A and Site B tested together (Scenario 1).

16.14 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).

16.15 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.

16.16 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)

16.17 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.

16.18 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.

16.19 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 B alone the day/sunlight analysis identifies twelve (18%) properties which would be majorly affected and an additional 2 (3%) that would see a moderate adverse effect.

Daylight and sunlight impacts

16.20 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.

16.21 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

16.22 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.

16.23 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.

16.24 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, a KD, five LKDs and six bedrooms.

16.25 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.

16.26 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.

16.27 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.

16.28 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.

16.29 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 45 - Block C/D (3 above), Flats A-M Ferndown (6) & 1-2 Cranbourne (8&9)

Agar Grove Estate - Flats A-M Ferndown

16.30 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.

16.31 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.

16.32 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.

16.33 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.

16.34 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.

16.35 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

16.36 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.

16.37 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.

16.38 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.

16.39 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

16.40 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 oriented due-west, which are not affected.

16.41 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.

16.42 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.

16.43 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.

16.44 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

16.45 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.

16.46 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.

16.47 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.

16.48 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.

16.49 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.

16.50 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 46 – Image showing location of properties referenced below and above on Barker Drive and Weavers Way

232-246 Barker Drive

16.51 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.

16.52 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.

16.53 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.

16.54 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

16.55 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.

16.56 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.

16.57 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 40 in the image above.

6 Weavers Way

16.58 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.

16.59 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.

16.60 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

16.61 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.

16.62 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.

16.63 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

16.64 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.

16.65 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.

16.66 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.

16.67 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.

16.68 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

16.69 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.

16.70 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.

16.71 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.

16.72 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.

16.73 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

16.74 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.

16.75 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.

16.76 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.

16.77 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.

16.78 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.

16.79 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

16.80 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.

16.81 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.

16.82 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

16.83 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.

16.84 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.

16.85 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

16.86 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.

16.87 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.

16.88 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 47 – Image showing location of properties referenced below and above on Crofters Way

65-79 Crofters Way

16.89 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.

16.90 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.

16.91 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

16.92 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.

16.93 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.

16.94 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.

16.95 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

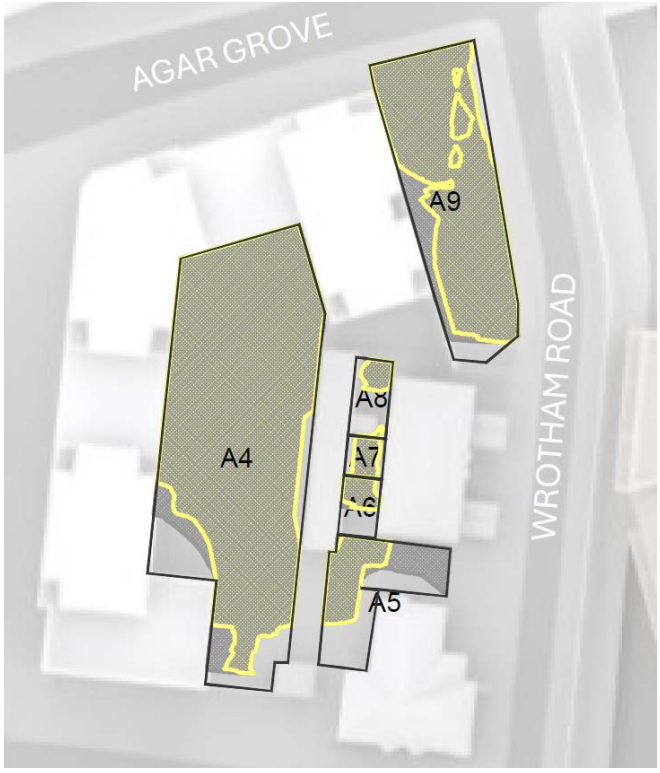
to read and react to signals. These studies will need to be discussed with the Network Rail and TfL Asset Protection teams to determine adequate mitigation measures.

16.96 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

16.97 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.

16.98 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.



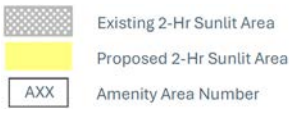


Figure 488 - Overshadowing plan showing most affected amenity space at A-M Ferndown (A5)

16.99 Overall, whilst the effect is considered noteworthy, it would not require mitigation. Therefore, the development is considered acceptable in terms of its overshadowing impacts.

Conclusion – Daylight and sunlight

16.100 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.

16.101 It is also noted that the analysis above is considered against the BRE guidelines which can be applied flexibly, and which is designed to be applied to suburban areas not inner-city environments.

16.102 To summarise, when assessing the Scenario 1 proposals of both Site A and Site B being developed in accordance with the currently submitted planning applications, 77% of properties assessed would experience a negligible or minor adverse effect only.

16.103 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.

16.104 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.

16.105 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.

16.106 The overshadowing impact is minor and does not require mitigation and overall is also considered acceptable.

Outlook and privacy

16.107 The development on Site B 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

16.108 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 on Site B such as offices and retail activities do not have significant noise creating potential. There may be some noise created by visiting service vehicles but this would not be excessive. Flues and plant equipment from the commercial premises would be located towards the railway side of the site, away from residential properties. Noise and vibration emissions would be controlled by condition.

16.109 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.

16.110 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.

16.111 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.

16.112 Equipment noise and vibration controls will be secured by condition.

Artificial light

16.113 The internal lighting from the new homes and commercial spaces 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.

16.114 The specific details of lighting and light spill in the area from the proposed development can adequately be secured by condition.

Neighbouring amenity conclusion

16.115 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 B development there would be a major adverse day/sunlight impact to 18% of those properties surveyed and moderate adverse impact to 3% of properties (total 21%) and this increases to a 23% major/moderate adverse impact with both developments on Site A and Site B in place.

16.116 With respect to those properties, there is a conflict with CLP policy A1 insofar as it relates to protecting the amenity of those neighbours.

16.117 However, most of 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.

16.118 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.

16.119 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.

17. MICROCLIMATE

17.1 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.

17.2 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.

17.3 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.

17.4 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 private and public amenity areas

17.5 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.

17.6 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 21st March, which is a good level of sunlight access. The provision of sunlight for Site B on 21st March is shown below.

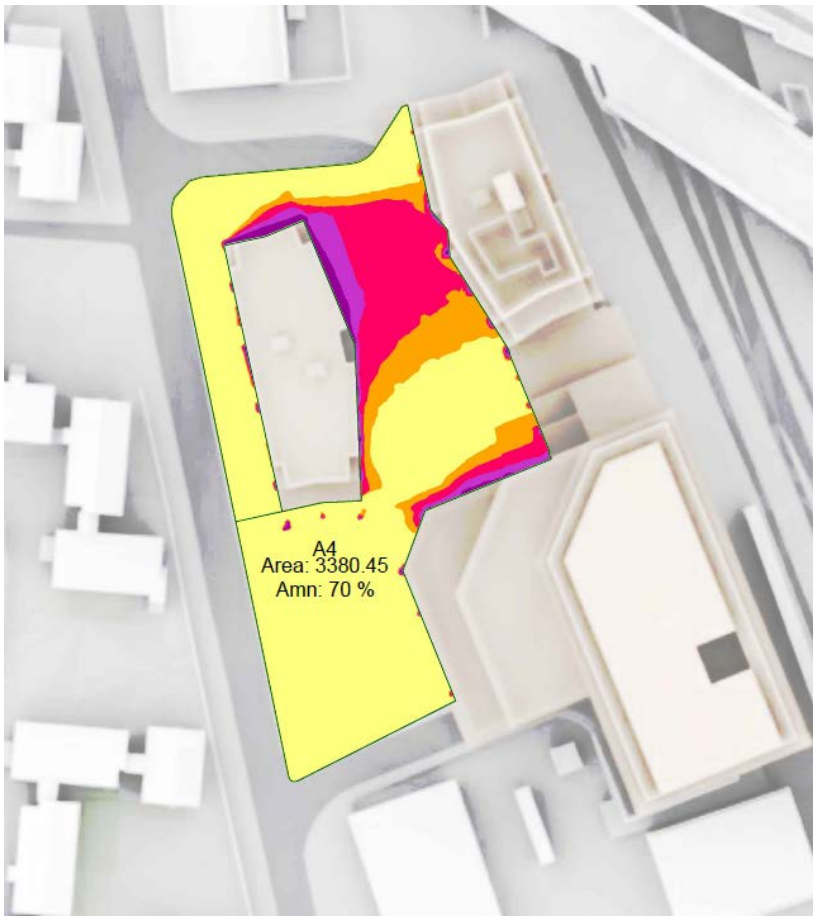


Figure 499 - Areas receiving at least two hours sunlight on 21 March (in yellow) for Site B.

17.7 The area marked as A4 above is the main public realm amenity area for the proposed development on Site B. The sunnier areas generally accord with spaces laid out for most intensive public activities, such as the Camley Yard play and open space to the south-east site corner, which aims to welcome visitors into the site.

17.8 Overall, the site layout means the levels of sunlight on ground are good.

Wind Microclimate

17.9 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

17.10 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.

17.11 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 8 - Lawson Comfort Criteria (wind comfort levels)

17.12 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 A.

17.13 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).

17.14 The analysis was undertaken in the context of the existing buildings surrounding the site. Several configurations were assessed, including the existing sites, 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.

Baseline conditions

17.15 There are no areas where winds would exceed the 15m/s annual safety threshold at ground level.

17.16 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.

17.17

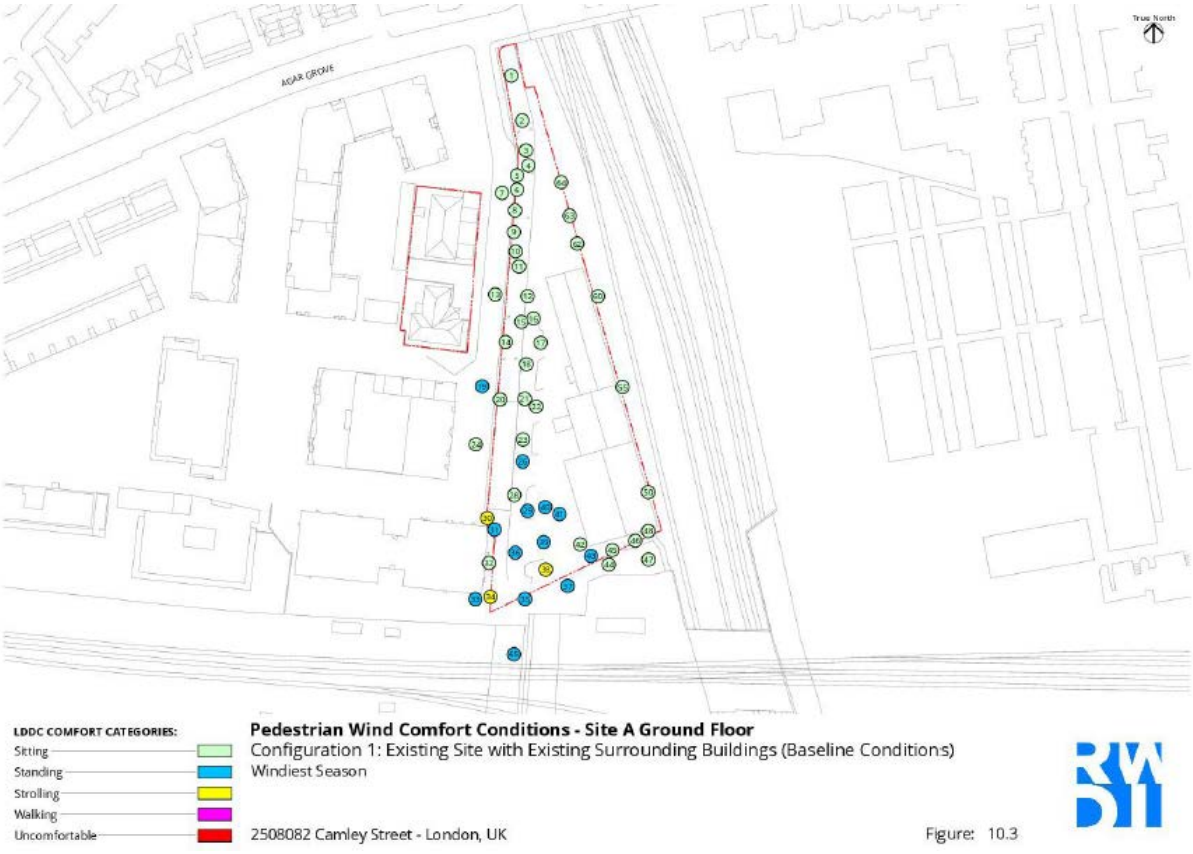


Figure 50 – Wind comfort levels for Site A (existing)

17.18 There are no instances of strong winds exceeding the safety threshold as existing.

Proposed development – Site B

17.19 During the windiest season, wind conditions on Site A and Site B and in the nearby surrounding area would range from sitting to strolling use, with localised walking use wind conditions at the north-eastern and south-eastern areas of Site B. During the summer season, wind conditions would generally be calmer, with mostly a mixture of sitting and standing use wind conditions.

17.20 For proposed development on Site B with existing surrounding conditions, there would be strong winds created at ground level. These winds would occur away from main residential entrances and areas of pedestrian movement. However, mitigation measures should still be investigated to reduce these winds. This can be secured by condition.

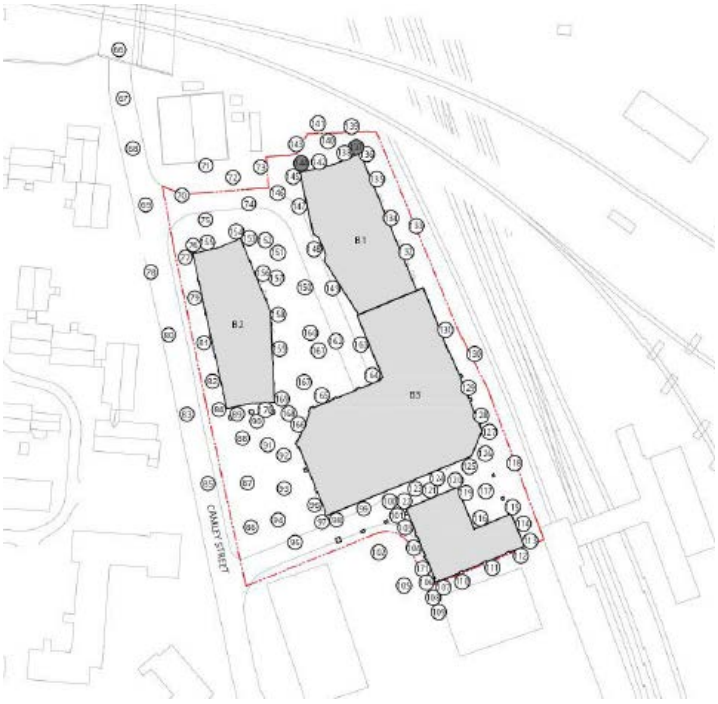


Figure 51 10 – Strong winds created on Site B (existing surrounding conditions) shown in dark grey.

17.21 There are a few areas within Site B that would be one category windier than required once the development on site is completed and which therefore would represent a Minor Adverse (Significant) effect. Strolling use wind conditions would occur at the southern, central entrance to Building B3 (probe location 124). Furthermore, standing use wind conditions would occur at the north-eastern corner of Building B2 (probe location 152).

17.22 Standing use wind conditions would also occur at the Level 9 terrace of Building B3 (probe locations 221, 222, 223 and 225), where sitting could be expected.

17.23 Wind mitigation measures in the form of tree planting and metal gates with semi-permeable finishes would be required to ensure conditions are suitable for the intended use. It is also noted that wind conditions within the central courtyard area (between Buildings B1 and B2) would be suitable for strolling only, even though ad hoc seating is provided in this location. Measures to maximise the suitability of this area for a range of activities should be investigated and provided. Details of these can be secured by condition. As such, no fundamental design changes are required to the proposal as planting can adequately deal with areas of wind that could feel excessive.

17.24 All other parts of the proposed development on Site B would be suitable for their intended end use, including residential balconies which are mostly suitable for sitting, other than in isolated examples and at the highest levels of the tallest proposed building.

17.25

Figure 5211 - Proposed winter comfort conditions at ground level for completed development on Site B (existing surrounding conditions)

Proposed development - Off-site impacts

17.26 The development on Site B would also result in strolling use wind conditions occurring off-site at the south-western corner of Agar Grove Estate (probe location 33) as the result of the development on Site B. This area would also be affected if the proposed developments at Site A and Site B were completed. As such, appropriate measures should also be investigated and secured to improve wind conditions here. As this area is off site, it must be secured by **s106 legal agreement**.

17.27 The wind assessment has stated that all other off-site impacts would be negligible at completed development stage including to thoroughfares, entrances and car parks in the windiest season.

Proposed development – Site A and Site B together

17.28 Should the proposed developments on both Site A and Site B be completed the effects would be similar to those for Site B alone. There would be some strong winds occurring that exceed the 15m/s annual safety threshold at ground level as discussed above.

17.29 Pedestrian comfort conditions on Site A and Site B and in the nearby surrounding area would generally be similar to the existing situation in both winter and summer.

17.30 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.

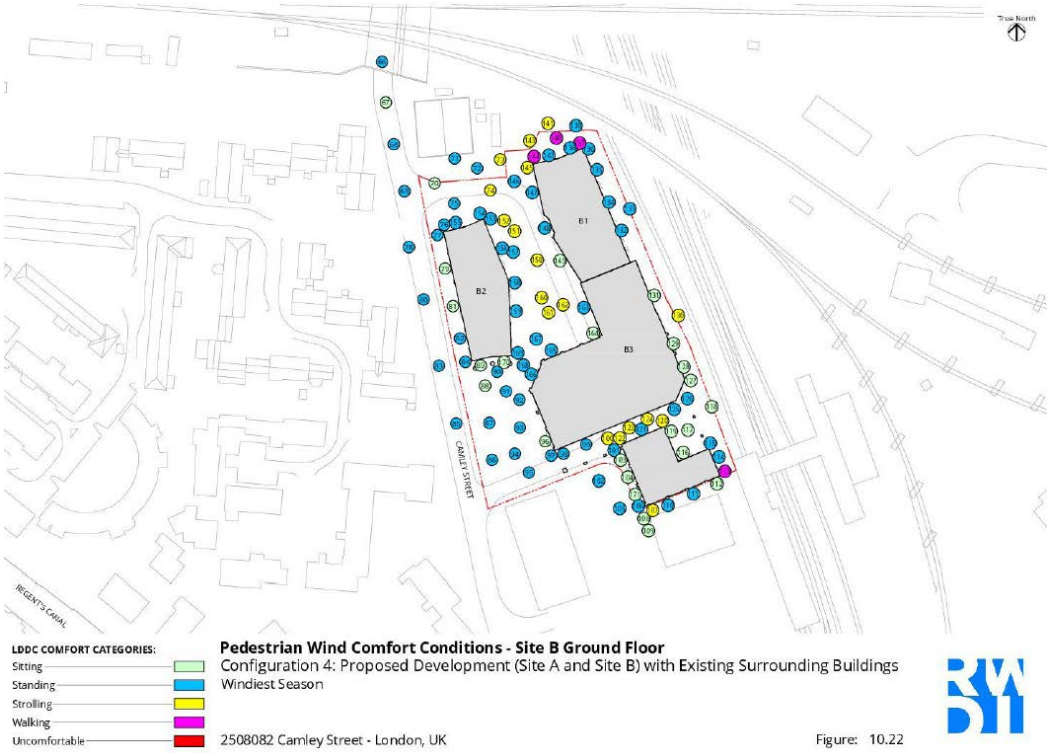


Figure 53 12 - Proposed winter comfort conditions at ground level for completed development on Sites A and B combined (existing surrounding conditions)

17.31 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.

17.32 Details of appropriate mitigation measures in the form of tree planting/gates to counter these effects can be secured by condition.

17.33 All other parts of the proposed developments on both sites would be suitable for their intended end use, including residential balconies which are mostly suitable for sitting.

17.34 As with the development on Site B, both developments together would also result in strolling use wind conditions occurring off-site at the south-eastern corner of Agar Grove Estate (probe location 33). As such, appropriate measures should also be investigated and secured to improve wind conditions here. As this area is off site, it must be secured by **s106 legal agreement**.

17.35 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.

Conclusion

17.36 Overall, it is considered that the microclimate impacts are acceptable. The only impact to areas outside the site is to the south-eastern corner of Agar Grove Estate. This, and any adverse impacts within the site where they occur, can be managed and mitigated through careful design and landscaping secured through conditions and **s106 legal agreement**.

18. LANDSCAPE AND PUBLIC OPEN SPACE

18.1 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. 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.

18.2 Developments for over 100 dwellings trigger the GLA play requirements under the London Plan. LP policy S4 requires 10sqm play space per child. Policy G4 states that new developments should provide public open space in areas of deficiencies. The policies strive for an engaging public realm for people of all ages, with opportunities for social activities, formal and informal play and social interaction.

18.3 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.

18.4 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)

18.5 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.

18.6 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
- provision of a chain of suitably sized and located green and urban spaces linked with potential new pedestrian routes

Introduction

18.7 The existing site is predominantly hardstanding and built form; however it does include a small grass verge next to Camley Street with some trees.

18.8 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 and York Way SINC is located to the east of the site, north and south of the east-west railway lines, but Site B is

not directly adjacent to the SINC. The potential Camden Highline would run along the route of this SINC

18.9 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.

18.10 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

18.11 The location of these relative to the 100m (0-4 years), 400m (5-11 years) and 800m (12+ years) walking distances, for children of different ages, is shown in fig 60 Play Provision.

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

18.13

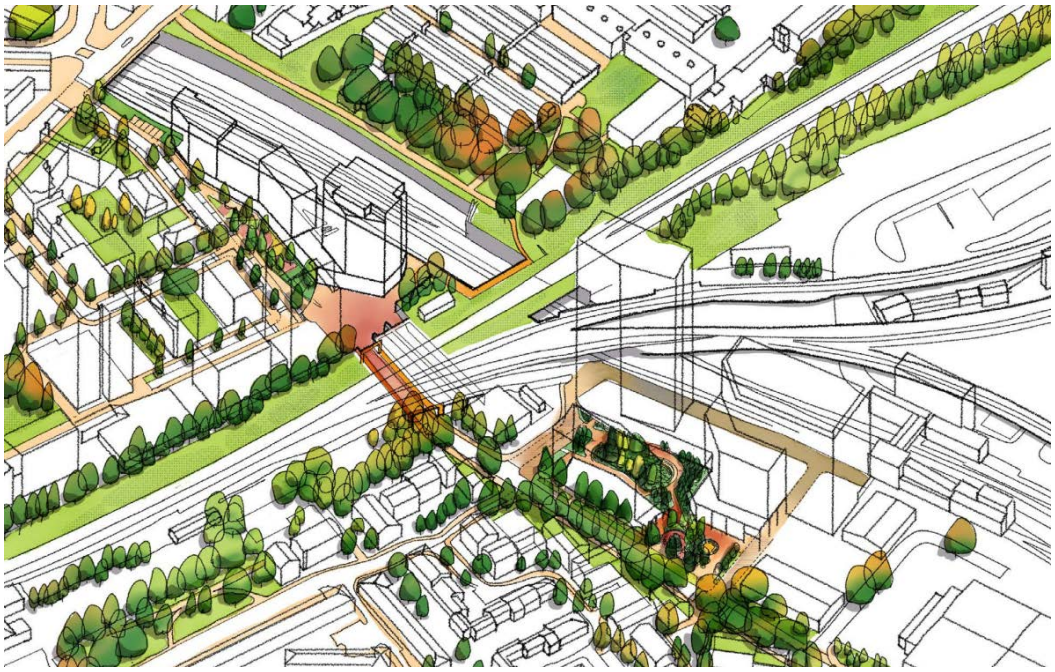


Figure 54 Illustrative plan showing Camley Street and Cedar Way landscaping proposals

18.14 ***Public Open Space***

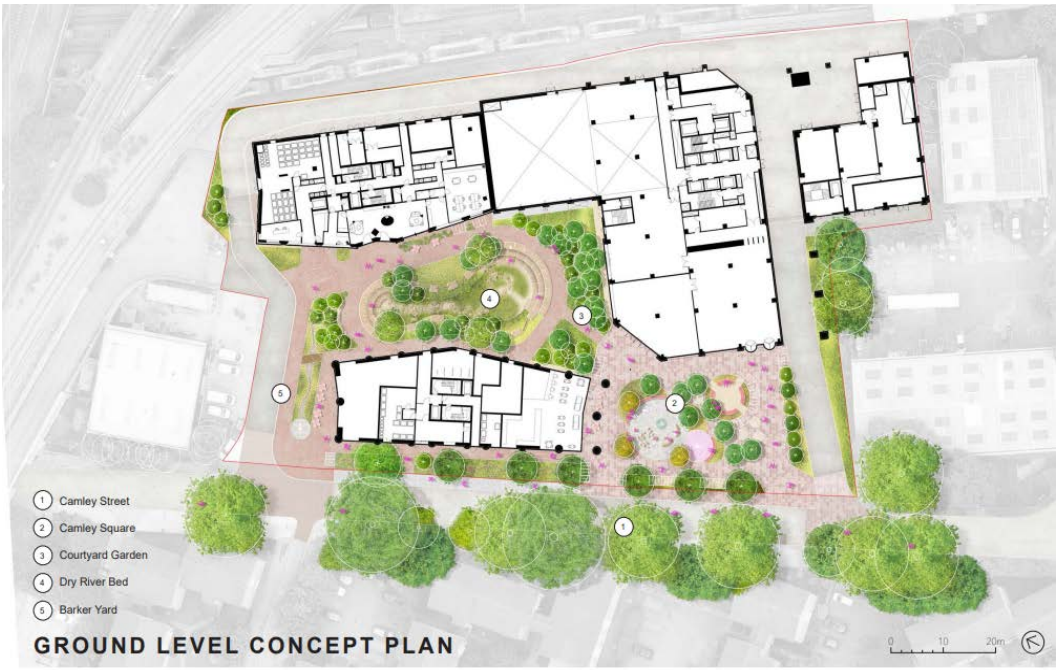
18.15 London Plan Policy D8 (Public realm) is the key London Plan policy in this topic area. Policy D8 contains provisions relating to the design, function, operation and maintenance of proposed public realm within developments and the relationship between buildings and public realm; part A sets out that '…development proposals should encourage and explore opportunities to create new public realm where appropriate'.

18.16 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.

18.17 Supporting para. 5.4.4 notes that 'There should be appropriate provision for different age groups, including older children and teenagers'. *this is modified by the Local Plan and Camden Planning Guidance, which set local open space requirements (which incorporate an element of play) and a modified additional play requirement.

18.18 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. The masterplan proposes five areas of public open space as shown in fig 55 and described below.

18.19 **Open Space Provision on Site**



18.20 *Figure 55 Public Realm/POS*

18.21 Fig 55 above shows the landscape masterplan for the site which is made up of five inter-connected spaces. The second largest space Camley Square (1105 sqm), at the south western corner, will form one of the key public open spaces along the Camley Street Spine. A flexible, inclusive civic space framed by active frontages of science and retail uses. It will be defined by a grove of trees and high-quality paving. It is an imaginative and playful space science-themed water play, an outdoor classroom, and plenty of seating. Rain gardens and seasonal planting enrich the space visually and ecologically, while orchard trees reference local permaculture.

Figure 56 View of Camley Square

18.22 The Courtyard Garden at 1395 sqm is the largest space and is located between the residential blocks B1 and B2. This space in contrast to Camley Square provides a greener more garden like area, and a semi-public heart to the scheme. The space supports doorstep play, informal seating, and quiet retreat. Framed by groves of multi-stem trees, it softens the scale of surrounding buildings and connects residents to nature.

18.23 *Figure 57 The Courtyard Garden*

18.24 At the northern gateway to the site is a smaller area Barker Yard (420sqm) which is a multi-functional space balancing servicing needs with public use. It will accommodate deliveries, pick-up/drop-off, and Network Rail access, while integrating a breakout space for retail and a water fountain. A swale and multi-stem tree grove contribute to SUDS and soften the industrial context.

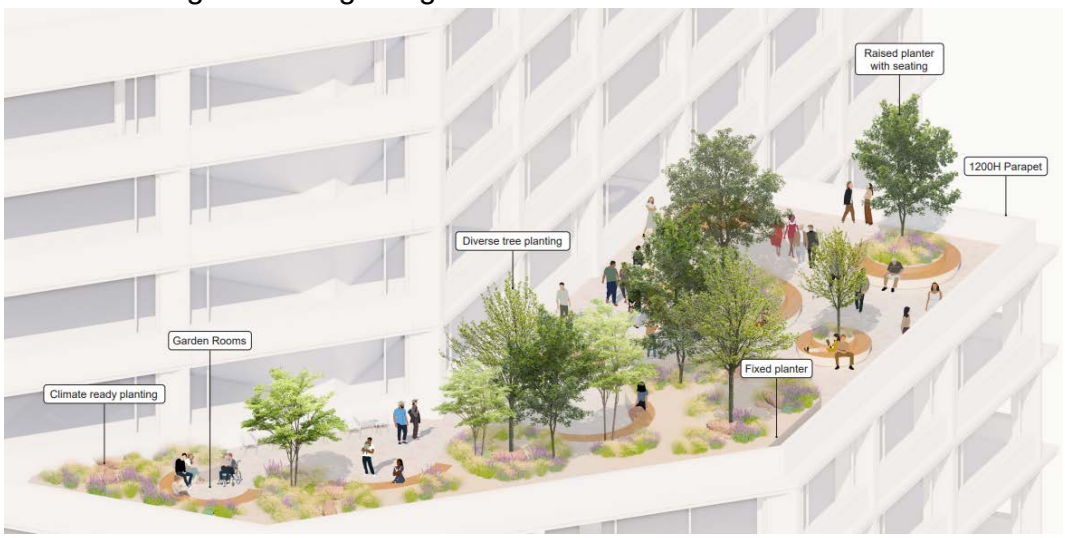
18.25 Along with two other spaces including a dry riverbed with visible SUDs features and a linear space marking the western edge of the site with Camley Street itself, the POS totals 3180sqm. Whilst this is only just over half of the 6018sqm required by policy it is considered that the public realm proposed will be of the highest quality and will bring new much needed civic spaces to

the area as well as serving the needs of the new residents. Also, the open space would make up approximately half of the ground area within the site boundaries. The under provision against policy will be mitigated by a payment in lieu to improve other open spaces in the area. The contribution is based on a formula in adopted guidance, which is recommended to be secured by **s106 legal agreement**.

18.26

Figure 58 View of Dry Riverbed open space

18.27 As well as at ground level there will be much greening on the upper levels of the buildings through green terraces and biodiverse roofs.



18.28 *Figure 59 Example of a green roof terrace area*.

18.29 Details of management and maintenance of the open space will be secured though planning obligations via the **s106 legal agreement** for all and the detailed designs of the open space will be secured through carefully worded conditions. Accordance with the Public London Charter would also be secured through planning obligation through the s106 agreement for all phases.

18.30 Contributions towards public realm improvements in the wider local area would also be secured through a pedestrian, cycling and environmental improvements contribution (see Transport section below).

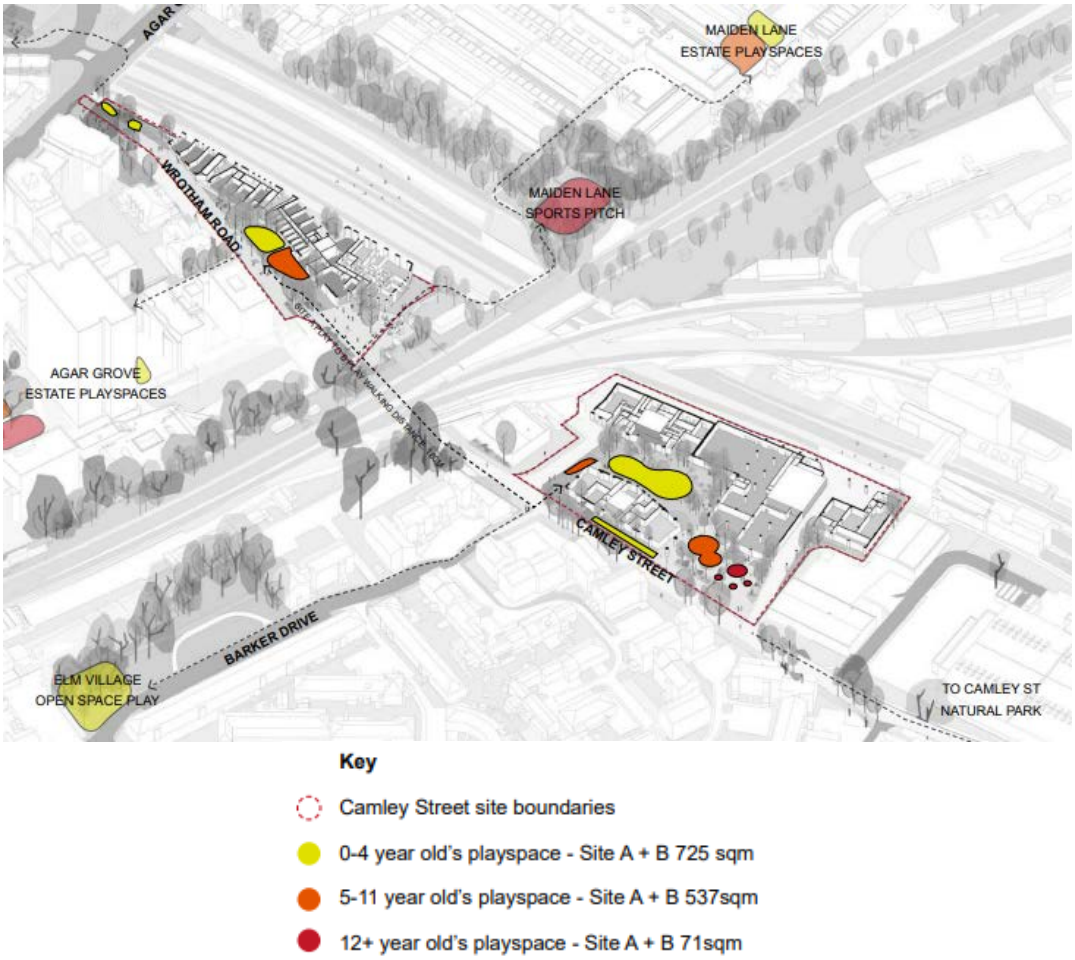
18.31 Given the above, it is considered that the proposed Public Open Space provision is acceptable.

Play Provision

18.32 Play is embedded throughout the site in both formal and informal ways. Along Camley Street, 'Play on the Way' elements like log steppers and balancing beams animate the rain gardens. Camley Square includes a science-themed play zone for ages 5–11, with M-frame rings and social seating aimed at older children. In the Courtyard Garden, informal play weaves through the dry river bed with boulders and a water pump at its southern terrace. Barker Yard features a playful water pump feeding into a swale, encouraging interaction and movement.

*Fig*ure 60 Play space across the age ranges

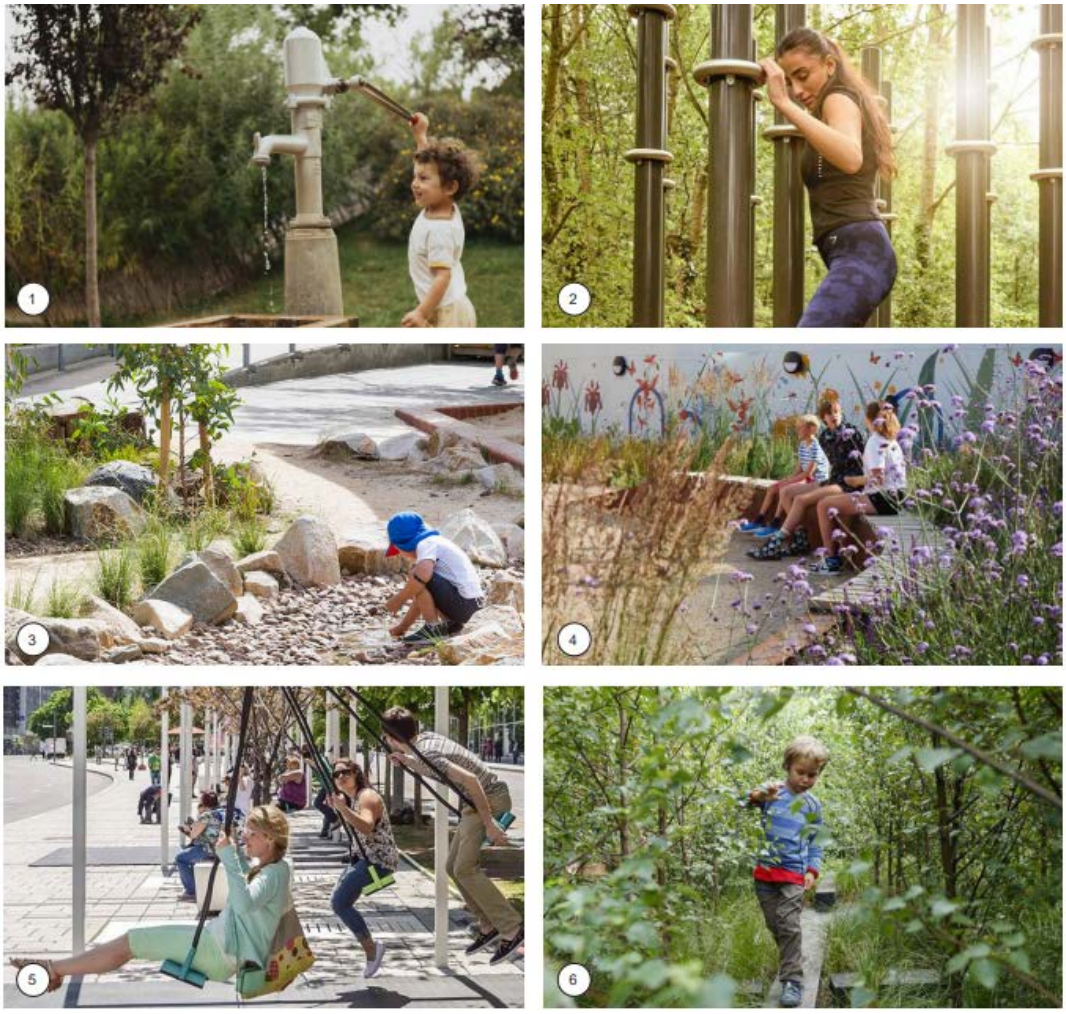
18.33 The total play space requirement for the Cedar Way site under policy is 560sqm, and 879sqm is proposed as shown in fig 60, with good provision across the three age ranges, particularly the 5-11 range where the proposed areas are more than double the policy requirement. The play provision was designed across both the Camley Street and Cedar Way sites together and each complements the other well; fig 61 shows provision across the two sites. The provision for the 12+ group will help to make up for the lack of provision for this group at the Camley Street site (Site A) (which has no provision for that group).



*Fig*ure 61 Play provision across the Cedar Way and Camley Street sites and the wider area

*Fig*ure 62 Play features integrated into the landscape

18.34 The play space across the site has been designed to be integrated into the public open spaces and wider public realm areas rather than being provided in separate ‘play parks’ as such and is considered to offer an scheme with a wide range of features to appeal to a wide cross-section of children of all ages.



*Fig*ure 63 Types of play activities proposed

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

Table 9 - Play space provision by age groups, across the Camley Street and Cedar Way sites.

18.35 The play provision proposed meets, and considerably exceeds, CLP policy requirements in terms of area. It is thoughtfully designed to integrate into the landscape, provides a range of play opportunities for all types of children, and meets the requirements of CLP Policy S4 and other policies and guidance in t terms of design. *Conditions will be added to secure details of the play spaces.*

18.36 *In summary,* whilst the POS level is well below policy requirements, it makes excellent provison for play *and is acceptable overall*. It will offer good provision for the future residents of the site as well as the wider local population.

19. TREES, GREENING, AND BIODIVERSITY

Impact on trees, greening and biodiversity

19.1 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.

19.2 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.

19.3 16 trees are proposed for removal in order to facilitate the development. This is due to either conflict with building footprints or with hard landscaping. The trees proposed for removal are:

19.4 • T20 – Category B2 (Silver Birch)
19.5 • T21 – Category C2 (Holly)
19.6 • T22 – Category C2 (Wild Cherry)
19.7 • T23 – Category B2 (Wild Cherry)
19.8 • T19 – Category U (Silver Birch – dead)
19.9 • T16 – Category B2 (Ash)
19.10 • T15 – Category B1 (Silver Maple)
19.11 • T1 – Category C1 (Box Elder)
19.12 • T2 – Category C2 (Leyland Cypress)
19.13 • T3 – Category C2 (Leyland Cypress)
19.14 • T4 – Category B2 (Wild Cherry)
19.15 • T5 – Category C2 (Rowan)
19.16 • T6 – Category C2 (Wild Cherry)
19.17 • T7 – Category C2 (Apple)
19.18 • T8 – Category C2 (Apple)
19.19 • T9 – Category C2 (Apple)
19.20
19.21 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.

19.22 Category U: trees in such a condition that they can not realistically be retained as living trees in the context of the current land use for longer than 10 years.

19.23

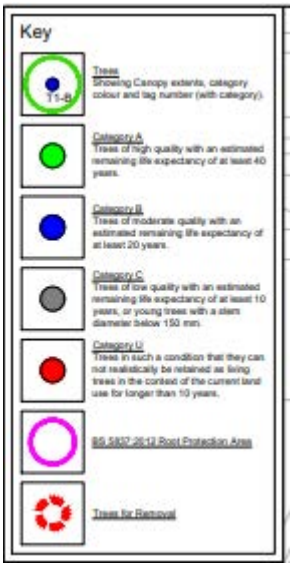
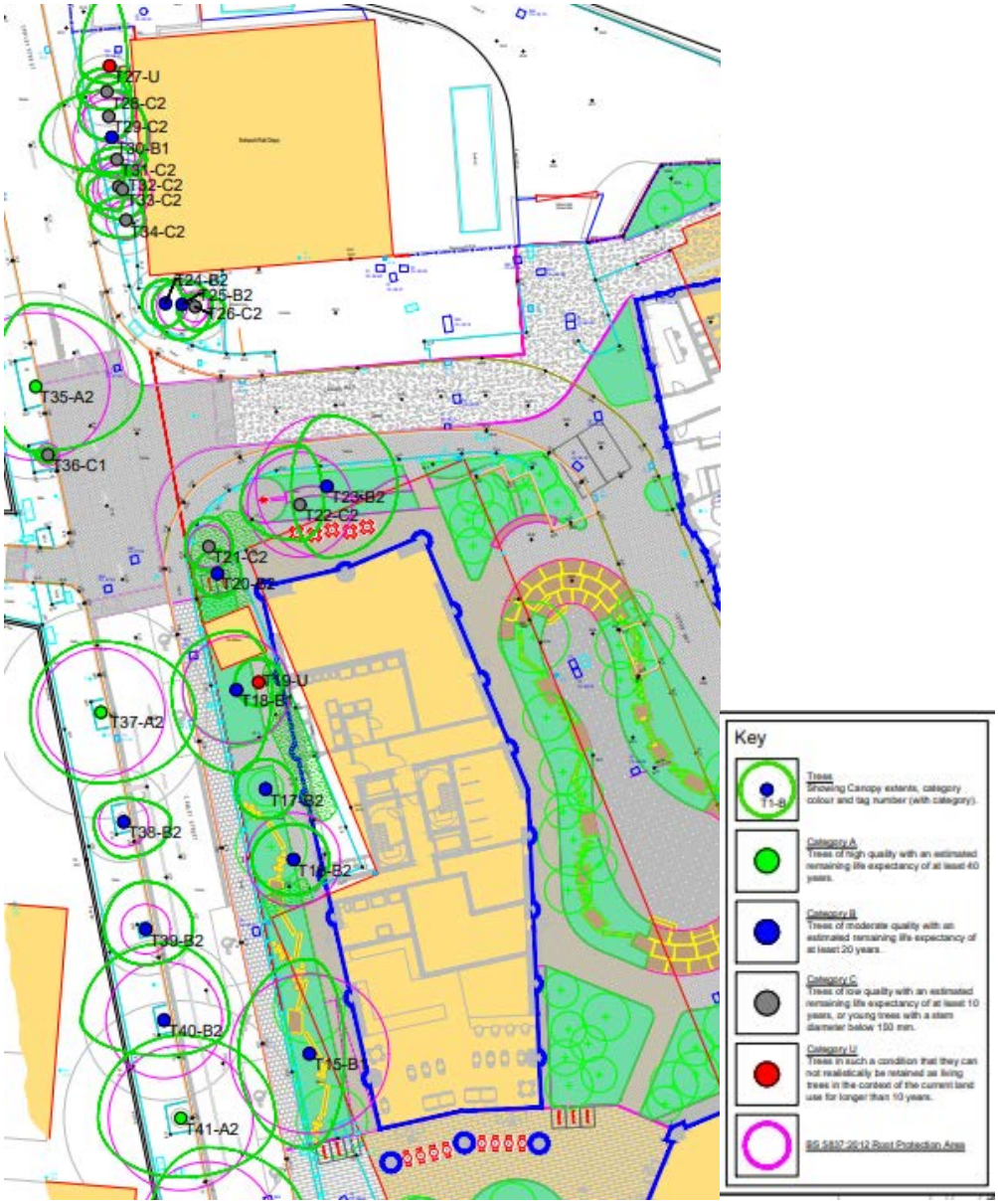


Fig 60 Tree removal plan (those circled in red proposed for removal)

19.24 No category A trees are proposed for removal. Of those that are proposed for removal, 1 is category U and 10 are category C (low quality) in accordance with BS5837:2012. 5 are category B. Most of those to be removed are in one group to the front of block B3; an engagement cabin is to be placed in this location (and is the subject of a current planning application referred to in the site history section of this report) for the duration of site works and ultimately the area will form part of the Camley Square POS. The arboricultural report notes that the scheme provides 'a structured and diverse new tree population, delivering long-term canopy cover, amenity, and ecological value. The planting design replaces the losses at a higher ratio (over 5:1 across the Camley Street and Cedar Way sites together) and ensures improved age structure and resilience' and 'Where trees are unavoidably lost due to building footprints or hard landscape conflicts, new planting is proposed at a replacement ratio of more than five new trees for every one removed. This commitment exceeds typical replacement standards and ensures a long-term enhancement of canopy cover and urban forest resilience'.

19.25 The Council's Tree and Landscape Officer considers that the proposed replacement tree planting mitigates the loss of the trees proposed for removal in terms of both canopy cover and public amenity. The public benefit of the proposed planting and public open space is considered to mitigate the harm caused. There will be a vast increase in tree numbers with 76 trees planted on the site. If approved, planning conditions will need to ensure sufficient space to allow replacement trees to achieve their potential and the final species, sizes and locations will be informed by the Council's tree planting strategy, with regard to species selection, size of nursery stock and post-planting maintenance.

19.26 

19.27 *Figure 64 Trees across the site frontage.*

19.28 T15, T16, T19 and T20 for removal. T17 and T18 to be retained. (Note all trees around the building to the north (T24-T34) are to be retained – these are off site)

19.29 The impact of scheme on the trees to retained will be of an acceptable level subject to permeable surfacing, no-dig solutions and appropriate method statements which can be secured by condition. Three trees to the front of block B2 will have root protection area (RPA) conflicts with retained trees and these will need to be managed using no-dig permeable paving and supervised demolition and hand excavation within the RPA of one tree (T18) which is category B.

19.30

19.31 Overall the proposals will provide significantly more tree cover than at present, good quality existing trees are retained where possible, and the proposals are in accordance with policy.

19.32 ***Biodiversity***

19.33 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).

19.34 The site is not identified in the Local Plan as deficient in access to nature. The baseline habitat value has been calculated as 0.81 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.

19.35 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.

19.36 The ecological enhancements 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

19.37 The landscape strategy embeds biodiversity into all parts 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

19.38 On completion of these measures, it is anticipated that the proposed development would have a positive impact on local biodiversity, including supporting the emerging Camden Nature Corridor. 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. It will be important to maximise the potential through careful planting design including that of the and biodiverse roofs, and opportunities for bird and bat boxes should be increased; all of which can be captured via planning conditions

19.39 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. The proposals meet the required 0.3 target and achieve an UGF of 0.34 across the site, which includes a range of greening measures such as intensive green roofs (1090sqm) with 150mm substrate and flower-rich perennial planting covering 679sqm. Permeable paving covers 1117sqm.

19.40 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

19.41 As well as the requirements of the development plan, there are statutory requirements for 10% Biodiversity Net Gain (BNG).

19.42 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.

19.43 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 0.81 habitat units, a proposed uplift to 2.49 habitat units, which results in a 208.73% uplift.

20. TRANSPORT

Policy context

20.1 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.

20.2 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.

20.3 In The draft CLP site allocation S6 (3-30 Cedar Way) 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

20.4 The site is in the Kings Cross ward and is sited east of Camden Town. It is bounded by railway lines to the east and north. To the west is the Elm Village residential estate. Public Transport Accessibility Level (PTAL) rating is a maximum of 4 (good), but it is generally well connected to public transport via is 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 north of the site on Agar Grove. Regent's Canal is also a useful pedestrian and cycle link to nearby public transport nodes and town centres.

20.5 There are Santander cycle hire docks on Agar Grove and Camley Street. The nearest dedicated parking bay for dockless rental e-bikes and rental e-scooters is located on Camley Street opposite the site. However, this bay is already showing signs of overcapacity and increasing demand.

20.6 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 6b. The Council has plans to expand the network of dockless rental e-bikes and rental e-scooter bays in the area.

Development context

20.7 This detailed planning application is for Full Planning Permission and relates to a single plot of development (Site B). The application is therefore being considered on its own merits. However, it has been submitted alongside a concurrent application at 120-136 Camley Street (application ref. 2025/4341/P – known as Site A) which is located to the north of this site across the railway lines.

20.8 The proximity of the sites means there are elements of the development proposals which relate to one other 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.

20.9 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 modal split

20.10 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.

20.11 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.

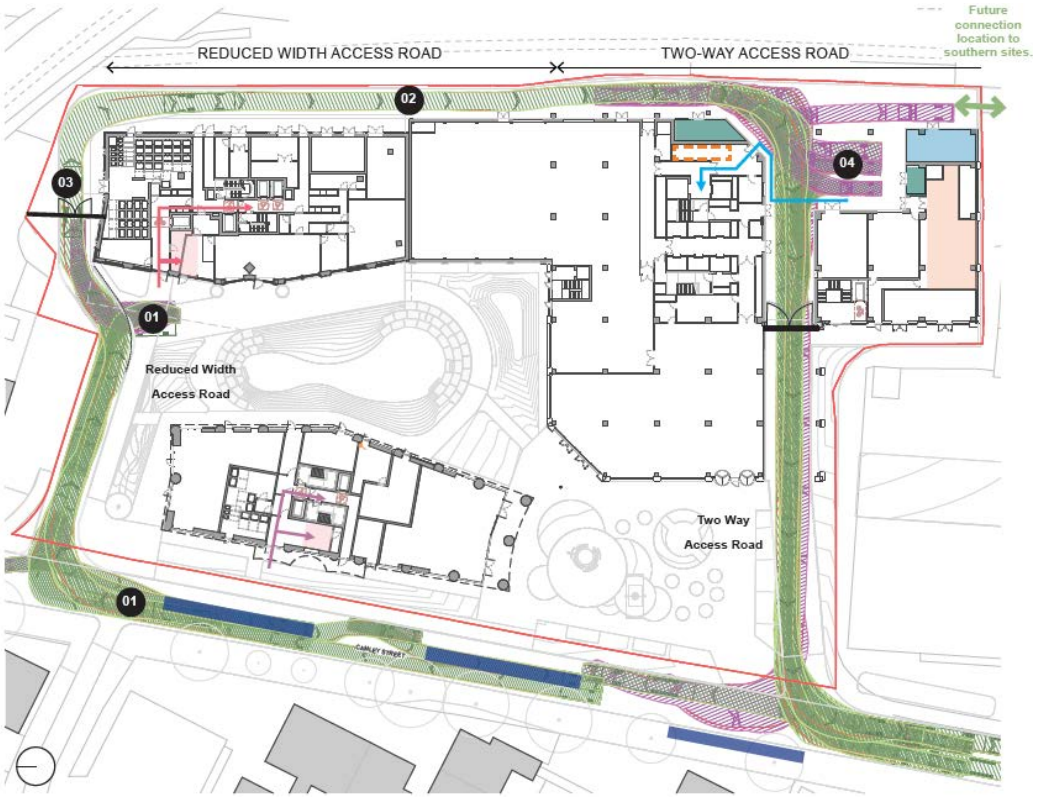
20.12 Considering the increase in active travel to and from the site, a financial contribution towards the aforementioned CTS committed schemes has been requested. An Active Travel Zone (ATZ) assessment included in the TA focuses on seven routes to key destinations. The analysis demonstrates there are 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 **s106 legal agreement**.

20.13 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. Travel Plans will achieve this and these document (one for residential and one for employment uses) plus associated monitoring and measures contributions of £11,348 for each plan will be secured by **s106 legal agreement**.

Car parking and vehicle access

20.14 Pedestrian, cycle, and motor vehicle access will be provided from Camley Street and will benefit from the enhanced public realm and better permeability through the site. internal access routes. Vehicle access will take place via redesigned junctions, including revised kerb radii and a raised table to improve and prioritise pedestrian movements. A perimeter loop around the site will allow access for emergency vehicles only. Vehicles access required by Network Rail will be maintained at the north of the site.



20.15

Figure 65 – Delivery and servicing access and egress at the site

20.16 The site is located in controlled parking zone CA-X Elm Village, with controlled hours 08:30-18:30 Monday to Friday and 08:30-12:00 Saturday. The development will be car free secured by **s106 legal agreement,** restricting both residential and business permits in accordance with CLP policy T2.

20.17 Nine accessible parking bays will be provided on Camley Street which is in line with the London Plan policy. This will result in the loss of nine existing parking spaces (six permit holders or pay-by-phone, and three permit holder spaces). Parking surveys indicate there is spare overnight capacity to accommodate this reduction in on-street parking. The provision of on-street parking spaces can be secured through **s106 legal agreement**.

20.18 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 **s106 legal agreement** in accordance with Local Plan Policy A1.

20.19 There is scope to extend the CA-X CPZ control hours and Council studies have identified this CPZ as presenting a significant need to increase parking regulation within its area, subject to consultation and review. The development has potential to increase on-street parking pressure which would further drive demand for this CPZ review. Considering the scale and the location of the proposed development, a contribution of £15,000 shall be secured through **s106 legal agreement** towards a review of the CA-X CPZ, which is likely to take place in 2026/27 or 2027/28.

Cycle parking

20.20 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.

20.21 For all proposed uses, 635 long-stay cycle parking spaces will be provided in secure, covered, step free and lockable cycle stores. All cycle stores would be accessed from ground floor public realm areas. Storage is in dedicated basement stores via large cycle lifts.

20.22 62 visitor cycle parking spaces will be provided in the form of Sheffield stands throughout the public realm in locations near to entrances and with good surveillance.

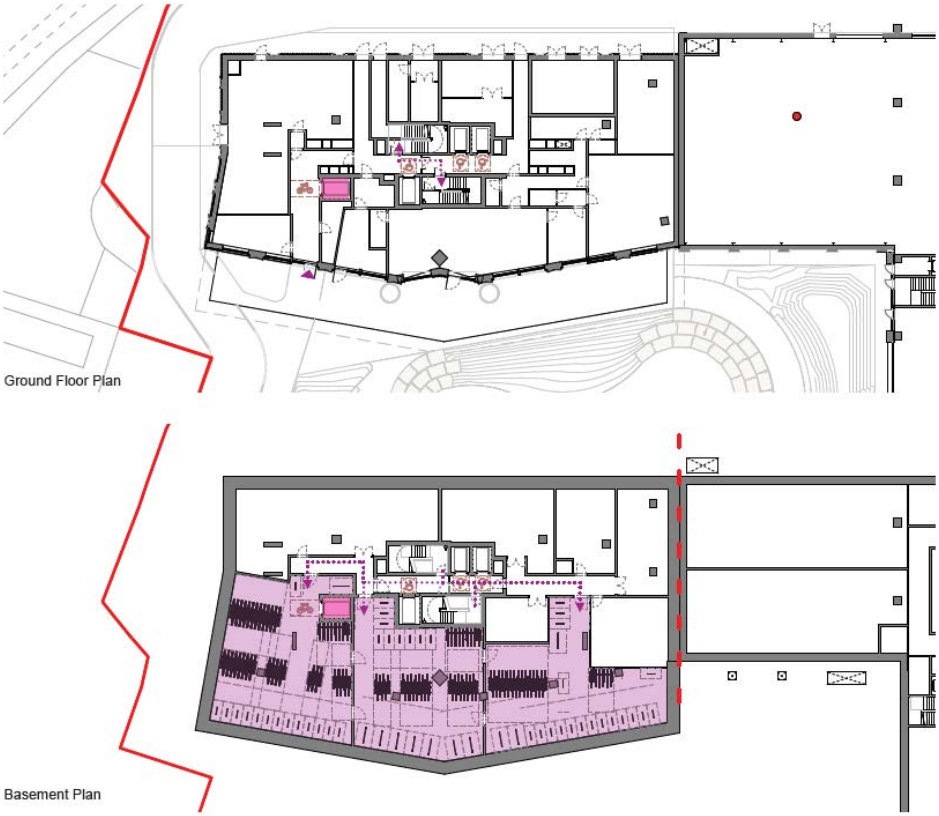


Figure 66 – Example of basement cycle parking and access in Block B1 (tower)

20.23 In total 40 cycle spaces will be provided at Block D1. These would consist of two-tier racks and 8 spaces consisting of Sheffield stands in the lower ground floor. A ground floor cycle store would provide 6 Sheffield Stands and 3 enlarged cycle stands. A lift designed in accordance with the requirements set out within the London Cycling Design Standards (LCDS) document would provide access to the basement cycle store.

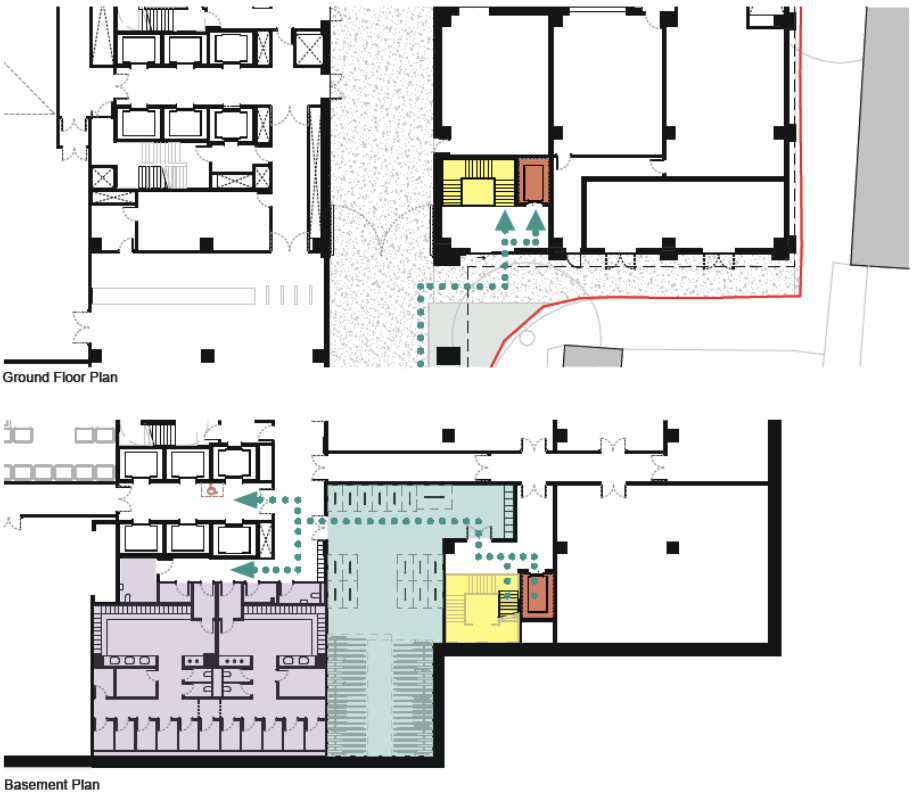


Figure 67 - Cycle Parking and facilities for Block B3 commercial

20.24 The level and mix of cycle parking provision are in compliance with the London Plan standards and CPG Transport. Final details of the cycle parking provision would be secured by condition.

Servicing and deliveries

20.25 A draft Delivery and Servicing Plan (DSP) was provided with the application. The proposed development is expected to generate demand for 120 daily servicing vehicles. A servicing yard for the main commercial floorspace at the south of the site is provided, accessed from the southern Camley Street access. On-site service space for residential building B1 is available via the northern Camley Street access and a new loading bay on the eastern kerbside of Camley Street is available for residential building B2. The swept paths arrangements are considered acceptable by the Transport Officer.

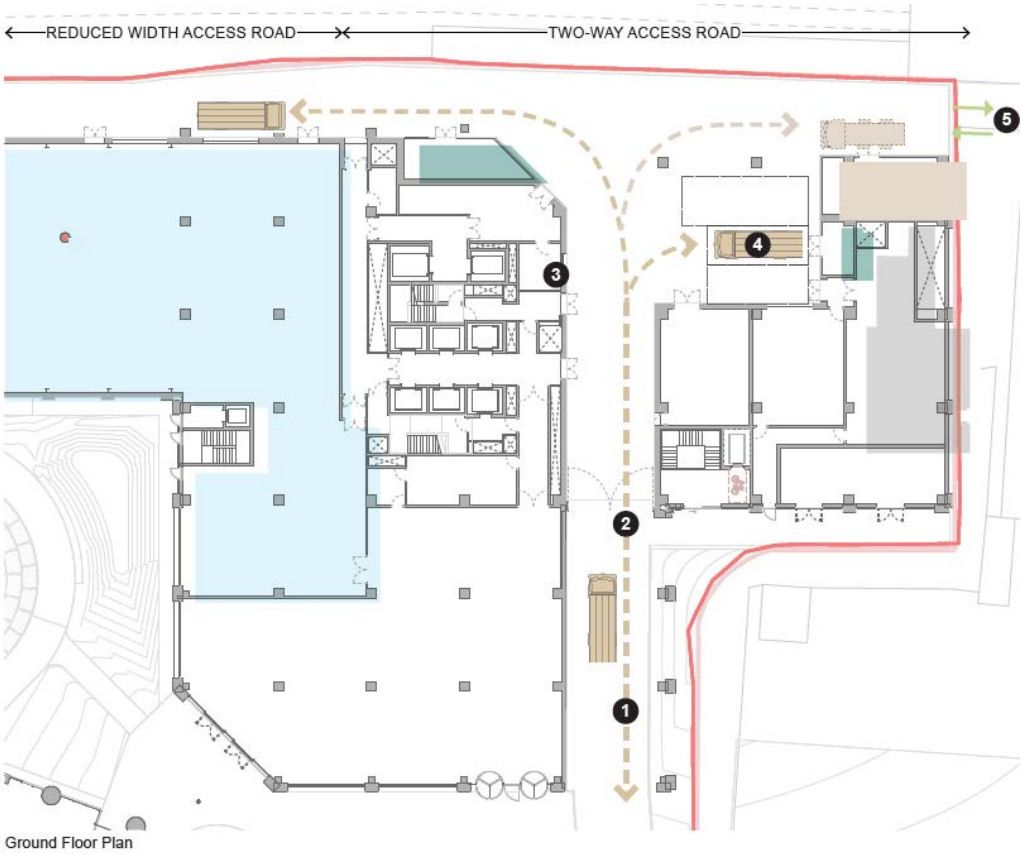


Figure 68 – Dedicated service and delivery space for Block B3 commercial

20.26 A detailed **Delivery and Servicing Management Plan (DSMP) will be secured by the s106 legal agreement**.

Construction Management

20.27 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 **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 A also.

20.28 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.

20.29 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 **s106 legal agreement** in accordance with Local Plan Policy A1.

20.30 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 **s106 legal agreement**.

Highway works

20.31 Where construction works might result in damage to public highway a financial contribution is required. A highways contribution of £100,000 will be secured by **s106 legal agreement**.

Micro/shared mobility

20.32 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.

20.33 A micro and shared mobility improvements contribution of £10,000 would therefore be secured by **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

20.34 Pedestrian, cycle, and motor vehicle access will remain available from Camley Street to the south, along with a new northern cycle/pedestrian link via Wrotham Road connecting to Agar Grove. A new and enhanced public realm will improve conditions for pedestrians and cyclists.

20.35 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.

20.36 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 **s106 legal agreement**.

20.37 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.

20.38 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 **s106 legal agreement**.

20.39 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. This will be secured by **s106 legal agreement**.

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

- secondary cycle network, footway widening and public realm improvements on Barker Drive west of the site,
- 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 to the north-west of the site,
- Better Bus Partnership, specifically the upgrade of the bus stops/shelters on Agar Grove to the north of the site, including real-time bus information,
- Healthy Junction improvements for pedestrians, cyclists and road safety at Camley Street/Goods Way approximately 750m from the site, which are critical to ensure safe and attractive active travel journeys from the south,
- 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 north 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

20.41 Transport for London are content with the proposals on Site B, 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 north and east Site B, as well as maintenance and freight facilities.

Figure 69 13 – Network Rail land ownership shown in green

20.42 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 east of Site B 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.

20.43 Network Rail have also raised concerns that the underpass to the north of Site B would be used by an increased amount of pedestrian and cycle traffic. While pedestrian and cycle traffic is expected to increase, vehicle traffic is expected to decrease. 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.

20.44 It is also understood that 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 pedestrian and cycle movements to Site B cannot be reasonably upheld.

20.45 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 **s106 legal agreement** alongside the underpass improvement discussions secured above.

20.46 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.

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

Conclusion

20.48 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.

21. SAFETY AND SECURITY

21.1 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 the 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.

21.2 The proposed development of both sites (A and B) seeks to improve permeability of the site with stronger north-south and east-west connections encouraging more people to walk and cycle through the site. This increase in permeability alongside the 401 homes proposed will bring activation and eyes on the street making it feel safer and reducing the potential for crime.

21.3 The applicant has engaged with the Designing Out Crime Officer prior to submission and incorporated their feedback. The site backs onto a railway line and gates are proposed to restrict access from the site to the rear of the site that will be used as an emergency access/servicing route. The public realm benefits from good natural surveillance, clear site lines and appropriate

delineation of public and private areas. The mix of uses will ensure good activity levels maintained throughout the day and evening. Security at night will be subject to on site management. An appropriate lighting strategy is proposed and further details will be secured by condition. Overall, these will help create a safer and more inclusive environment.

21.4 The Council's Designing Out Crime officer was consulted on this application and requested that the site achieve a secured by design accreditation to silver award and that it should maintain this standard throughout the life of the development. This will be secured by condition.

21.5 As such, the development would result in a safe and inclusive environment in compliance with the development plan.

22. FIRE SAFETY

Policy context

22.1 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.

22.2 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 changes of use of existing relevant buildings.

22.3 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.

22.4 The application site (Site B) contains relevant buildings, and therefore a Planning Gateway One Fire Statement and a London Plan Fire Strategy Report have been submitted. The submitted Fire Statements were produced by Ashton Fire 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

22.5 The two residential buildings, blocks B1 and B2, are about 98m and 27m tall respectively, making them “relevant buildings” under Planning Gateway One. Block B3 is the 53m tall Life Science and Technology block which is structurally separated from the residential blocks (although connected to B1) and is subject to a separate fire strategy.

Figure 70 – Plan of the three buildings on site

22.6 Each block is an independent building, with no shared structure or services between the residential and life-science buildings. This separation helps to prevent fire spreading between buildings. External wall materials will meet the legal requirements for tall buildings, which prevent the use of combustible cladding. Walls and floors in the towers have between 60 and 120 minutes of fire resistance, depending on height and use, in line with current guidance.

22.7 The residential blocks (B1 and B2) are designed in line with current guidance for taller residential buildings, including the use of protected escape stairs, enclosed corridors with mechanical smoke ventilation systems, sprinklers throughout, the blocks, and emergency lighting and signage throughout the buildings. Building compartmentation would slow fire spread and keep escape routes safe. The life-sciences building (block B3) also includes two protected firefighting stairs, and smoke-ventilated lobbies.

22.8 The residential buildings use a “stay-put” approach, which means only the flat affected by fire is expected to evacuate, while other residents remain safe in their homes unless they choose to leave. This strategy relies on strong internal fire separation, smoke control in corridors and automatic sprinklers.

The life-science building uses a phased approach, where the floor closest to the fire evacuates first.

22.9 All residential floors are served by two firefighting stair cores with firefighting lifts and evacuation lists for residents who cannot use stairs. Block B1 is served by two firefighting shafts, each with a firefighting stair and wet rising main. One shaft will contain two dual-purpose evacuation / firefighting lifts, and the other a single dual-purpose lift. Block B2 includes two firefighting shafts, each with a stair, dry rising main and a dual-purpose evacuation / firefighting lift.

22.10 Block B3, the life-sciences block, uses a phased evacuation. The floor closest to a fire would evacuate first, followed by others in stages. This avoids congestion on stairs and is the standard approach for taller non-residential buildings. Block B3 also has two firefighting shafts, each containing a protected stair, a firefighting lift, and fire mains.

Access for firefighting

22.11 Fire service vehicles, including large turntable ladders, can reach each block via Camley Street, with a clear route around all blocks. Access routes meet the London Fire Brigade Guidance.

22.12 Riser inlets are located within 18 metres of fire appliance parking points, and all parts of the buildings fall within required hose length distances. The fire appliance access, positions, and riser inlets are shown below.

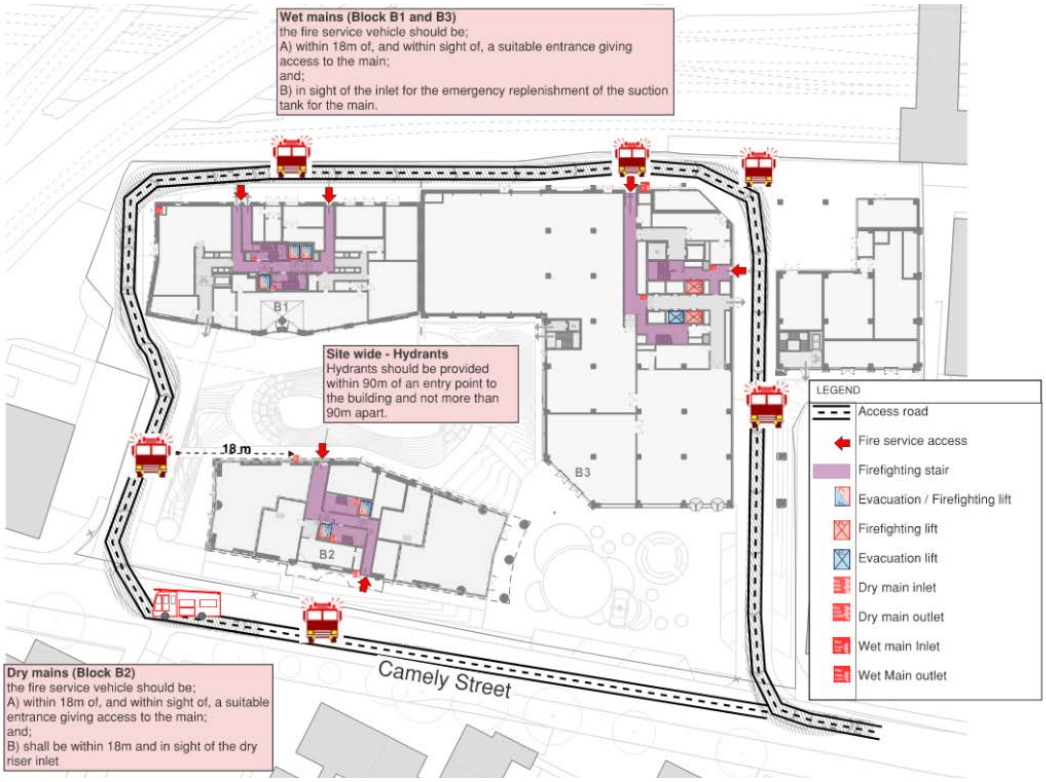


Figure 71 – Fire-fighting access to the site

22.13 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 18. Condition 19 would ensure ongoing interim access for fire appliances during construction for any occupied buildings.

22.14 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.

22.15 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 ere for information purposes and transparency. This includes further evidence or information on:

- Smoke management and ventilation
- Detailed design and measures for open plan apartments
- Risk and design of EV charging and storage (bikes and scooters)
- Detailed design for separation of corridors
- Cabling for PVs and ASHPs

Conclusion

22.16 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.

22.17 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.

23. AIR QUALITY

23.1 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.

23.2 Development that involves significant demolition, construction or earthworks will also be required to assess the risk of dust and emissions impacts in an AQA and include appropriate mitigation measures to be secured in a Construction Management Plan.

23.3 The application site is not within an Air Quality Focus Area (AQFA); however, the north and east 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)

23.4 The development will be car-free with no on-site car parking spaces provided (apart from disabled bays) and powered by Air Source Heat Pumps (ASHPs). The proposals are therefore considered to be Air Quality Neutral for building and transport emissions.

23.5 One diesel emergency generator is proposed at Site B and there will be two HVO (hydrotreated vegetable oil) generators (and two HVO pumps) for the Science and Technology building. Whilst HVO is accepted to have climate and carbon reduction benefits in comparison to diesel, there is limited evidence of their air quality benefits. Condition 12 is therefore recommended to ensure that alternatives to diesel and HVO such as Uninterruptable Power

Supply (UPS) or a secondary mains feed are considered, and to ensure the generators are appropriately sized, located and maintained to minimise air quality impacts.

23.6 All generator flues will be at least 1m above roof level of all surrounding buildings in at least a 20m radius which is acceptable, apart from one generator inlet in Building B3 which is only nine metres from one of the generator flues. The applicant's AQA states that this is acceptable as the building will be served by MVHR and as such, windows will not need to be opened; however, no plan has been provided to demonstrate how it will be ensured that windows are not opened during generator testing or operation.

23.7 It would be preferable for the flue to be positioned in a location where there is no risk of pollution ingress, and the requirement for residents to close their windows should only be the back-up option if it is demonstrated that this is not possible. As such, Condition 12 shall also secure the requirement for the flue / exhaust from the generator to be located away from air inlet locations, and only if this is not possible, for full details to be provided of how residents will be alerted to generator testing and what actions must be taken. A further condition (condition 13) shall secure the requirement to submit evidence that an appropriate system has been installed to manage alerts of generator testing prior to occupation.

23.8 The AQA states that the lab extraction system the science and technology building (Block B2) will be developed in line with Control of Substances Hazardous to Health (COSHH) requirements and will be designed to scrub and dilute any emissions. The AQP statement contains a description of the process which has been followed to minimise emissions to air and the steps which will be taken at the detailed design stage and beyond to control emissions in accordance with prevailing regulatory standards. As such, it is stated that no significant impact is expected. However, as the occupant of the laboratories is not yet known, to ensure there would be no adverse impact on air quality in the area, a condition is recommended to ensure any assessment of emissions is robust and appropriate mitigation is proposed.

Impacts on occupants

23.9 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 on the site. The development also utilises all-electric heating, which would maximise the air quality of the scheme.

23.10 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 NO2 concentration were above 25µg/m3 in these areas then there is considered to be a risk of exceedance of the NO2 annual mean objective. It is noted that the baseline is only just below 25µg/m3 in 2024 for site B (24.48µg/m3) and just exceeds this threshold when estimating the concentrations with development in place (26.06µg/m3). 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.

23.11 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.

23.12 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.

23.13 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 condition to ensure occupants are not exposed to poor air quality.

Demolition and construction impact

23.14 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 (i.e. through **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 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 condition.

24. WASTE AND RECYCLING

Construction Waste

24.1 The London Plan Policy SI7 sets a target of 95 per cent for recycling/ reuse of construction, excavation and demolition waste. A condition is attached.

24.2 The applicant will specifically prioritise targeting those materials with the highest levels of embodied carbon and the monitoring, reduction, and recycling of construction waste will be included as part of a waste management strategy as a component of the Construction Management Plans being secured. Further information on construction waste and circular economy is set out in the 'Sustainability and Energy' section. The minimisation of construction waste will comply with CLP policy CC1, LP policy SI 7, and other relevant guidance.

Domestic and commercial waste and recycling

24.3 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.

24.4 Each block would have separate bin stores for each use, with storage at ground floor. Block B3 would have an additional waste store at basement level which would be accessed via a goods lift. A draft delivery, servicing and waste plan has been submitted which was reviewed and updated with input from the Council's Waste Management team. Blocks B1 and B3 would have on site servicing with access from Camley Street and Block B2 would be serviced off a new on-street loading bay on Camley Street. Block B1 would now have an internal bulky waste store and an external collection area adjacent to the store. Residents would present external items prior to agreed collections to minimise the time items are left outside.

24.5 Final details for domestic and commercial waste collection would be secured by the **Delivery and Servicing Management Plan (DSMP) secured by s106 agreement**. A condition secures the waste stores installation prior to occupation of each use.

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

25. BASEMENT CONSIDERATIONS

25.1 Camden Local Plan policy A5 (Basements) seek to permit basement development where it is demonstrated that it will not cause harm, structurally, in amenity terms, environmentally or in conservation/design terms.

25.2 Single storey basements are proposed under Blocks B1 and B3, these are separate constructions and have a party wall; Block B2 will not have a basement. The application was accompanied by a Basement Impact Assessment (BIA) authored by Walsh by individuals with appropriate qualifications. The Council's basement consultant (Campbell Reith) carried out an independent review, reviewing the documents for potential impacts on land stability and local ground and surface water conditions arising from basement development. Campbell Reith raised comments and queries on the BIA in their initial audit which were responded to by Walsh in an updated version of the document (Revision 3) in December 2025.

25.3 The BIA includes a screening and scoping assessment. The BIA confirms that the proposed basement will be formed within made ground over London Clay Formation, underlain by the Lambeth Group at depth.

25.4 The BIA concludes that the proposed basements would not extend below the level of groundwater and there would be no impact on groundwater flow. It considers the impact of the proposed excavation on the neighbouring buildings and infrastructure including a structure used for freight loading and the Network Rail tracks. It concludes that predicted movement to the track infrastructure is below the Network Rail assessment criteria for track movement and therefore any risk of harm is very low. Movement to the freight loading structure and neighbouring buildings is predicted to be Category 1 which is very slight.

25.5 Campbell Reith concludes that the revised BIA is adequate and in accordance with the criteria laid out in policy A5 and guidance contained in CPG Basements. The appointment of a suitably qualified engineer to oversee the works will be secured by condition, and the build to be in accordance with the audited BIA will also be secured by condition.

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 B) and site A (120-136

Camley Street, ref: 2025/4341/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. A condition is recommended for a phased contaminated land condition comprising a site investigation and (where required) a subsequent remediation strategy and verification report.

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 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.

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 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 which is a 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 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 there is an aim for over 98% of the demolition arising to be diverted from landfill with an aim of securing a minimum of 95% of excavation waste put to 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 ($kgCO_2e/m^2$ 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.

27.16 The tables below show how the development performs against the guideline benchmarks, as well as the aspirational targets.

27.17 *Building B1 (Mixed-use including residential):*

Modules	**Min benchmark RESIDENTIAL ($kgCO_2e/m^2$ GIA)**	**Aspirational Benchmark for RESIDENTIAL ($kgCO_2e/m^2$ GIA)**	**Proposal ($kgCO_2e/m^2$ GIA)**
A1-A5	<850	<500	734
B-C (excl B6 & B7)	<350	<300	322
Total A-C (excl B6&B7 but inc sequestration)	<1200	<800	897

Table 9 - Summary of Whole-Life Carbon results assessed against residential development benchmarks (for Building B1)

27.18 *Building B2 (Mixed-use including residential):*

Modules	**Min benchmark RESIDENTIAL ($kgCO_2e/m^2$ GIA)**	**Aspirational Benchmark for RESIDENTIAL ($kgCO_2e/m^2$ GIA)**	**Proposal ($kgCO_2e/m^2$ GIA)**
A1-A5	<850	<500	608
B-C (excl B6 & B7)	<350	<300	269
Total A-C (excl B6&B7 but inc sequestration)	<1200	<800	793

Table 10 - Summary of Whole-Life Carbon results assessed against residential development benchmarks (for Building B2)

27.19 *Building B3 (Science and technology):*

Modules	Min benchmark OFFICES ($kgCO_2e/m^2$ GIA)	Aspirational Benchmark for OFFICES ($kgCO_2e/m^2$ GIA)	Proposal ($kgCO_2e/m^2$ GIA)
A1-A5	<950	<600	532
B-C (excl B6 & B7)	<450	<370	294
Total A-C (excl B6&B7 but inc sequestration)	<1400	<970	750

Table 11 - Summary of Whole-Life Carbon results assessed against offices development benchmarks (for Building B3)

27.20 In this case, the development meets the minimum benchmarks for modules B-C and modules A-C (including sequestration) for Buildings B1, B2 and B3. However, Buildings B2 and B3 also meet the aspirational benchmarks for modules B-C and the overall target for A-C.

27.21 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.

27.22 Prior to first occupation of the development a post-construction assessment of WLC must be completed and this can be secured by condition.

27.23 As such, the whole life carbon objectives for this development proposal are considered acceptable.

Energy and carbon reductions

Energy and carbon summary

27.24 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).

27.25 After carbon has been reduced as much as possible on-site, an offset fund payment can be made to achieve net zero carbon.

27.26 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.

27.27 The site-wide total reductions meet the 35% target:

Policy requirement (on site)	Min policy target	Proposal reductions
Be lean stage (low demand): LP policy SI2	N/A	12.6%
Be green stage (renewables): CLP policy CC1	20%	47.5%
Total carbon reduction: LP policy SI2 and LP CC1	35%	54.1%

Table 12 - Site-wide detailed carbon saving targets

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

Policy requirement (on site) RESIDENTIAL	Min policy target	Proposal reductions
Be lean stage (low demand): LP policy SI2	10%	11.7%
Be green stage (renewables): CLP policy CC1	20%	62.1%
Total carbon reduction: LP policy SI2 and LP CC1	35/50%	66.5%

Table 13 - Residential use – detailed carbon saving targets

Policy requirement (on site) B1 NON-RES.	Min policy target	Proposal reductions
Be lean stage (low demand): LP policy SI2	15%	13.5%
Be green stage (renewables): CLP policy CC1	20%	1.2%
Total carbon reduction: LP policy SI2 and LP CC1	35%	14.5%

Table 14 - Non-Residential use (Building B1) – detailed carbon saving targets

Policy requirement (on site) B2 NON-RES.	Min policy target	Proposal reductions
Be lean stage (low demand): LP policy SI2	15%	-1.8%
Be green stage (renewables): CLP policy CC1	20%	7.8%

Total carbon reduction: LP policy SI2 and LP CC1	35%	6.2%

Table 15 - Non-Residential use (Building B2) – detailed carbon saving targets

Policy requirement (on site) B3 NON-RES.	Min policy target	Proposal reductions
Be lean stage (low demand): LP policy SI2	15%	15%
Be green stage (renewables): CLP policy CC1	20%	6.9%
Total carbon reduction: LP policy SI2 and LP CC1	35%	20.9%

Table 16 - Non-Residential use (Building B3) – detailed carbon saving targets

Policy requirement (on site) TOTAL NON-RES.	Min policy target	Proposal reductions
Be lean stage (low demand): LP policy SI2	15%	14.8%
Be green stage (renewables): CLP policy CC1	20%	6.8%
Total carbon reduction: LP policy SI2 and LP CC1	35%	20.6%

Table 17 - Non-Residential use (Total) – detailed carbon saving targets

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

Total carbon reductions

27.30 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.

27.31 This is charged at £95/tonne CO2/yr (over a 30-year period) which for the development proposal on Site B is 243.3 tonnes x £95 x 30 years = £693,395. This amount will be spent on delivery of carbon reduction measures in the borough.

27.32 It is relevant to note that there has been a change in the Building Regulations and the methodology for calculating carbon. New applications should respond to Part L of the 2021 Regulations and SAP10.2 carbon factors. In comparison with the previous Part L 2013 Regulations and SAP10 carbon

factors there have been changes to both the baseline assumptions and also the carbon factor which has reduced the carbon saved by around 42% for each kwh of electricity used. Therefore, a development using the same amount of electricity will now have a carbon reduction calculation 42% lower – due to the decarbonisation of the electricity supplied from the grid through a wider decreased use of fossil fuels and increased use of renewable energy such as wind and solar power and other low carbon electricity.

27.33 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.

27.34 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.

27.35 The proposed development on Site B generally performs well and significantly improves on the policy target of 50% reductions for the residential accommodation by achieving an overall on-site reduction of 66.5% below Part L requirements as shown in Table 13 above.

27.36 For the non-residential element of the proposal the overall carbon reduction of 20.6% does not meet the requirement for 35% reduction on site. As mentioned above, these targets are now hard to achieve since the changes in Building Regulations. Despite this the target is almost met for be lean reduction in carbon emissions (14.8% against a target of 15%). The shortfall comes against be green renewable energy objectives. (6.8% against 20%).

27.37 This is not a zero-carbon development and as such there is a carbon offset payment of £693,395 required which will be secured by **Section 106 legal agreement** to bring it to zero carbon, in compliance with the development plan.

<u>Be lean stage (reduce energy demand)</u>

27.38 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.

27.39 The proposals include excellent air permeability with efficient walls, roof and windows. The design includes low energy lighting with auto off control, mechanical ventilation heat recovery (MVHR) but also active cooling which would impact on the overall energy efficiency. Wastewater heat recovery is not included in this proposal.

27.40 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.

Be clean stage (decentralised energy supply)

27.41 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.

27.42 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 the distance or barrier of the railway line. Evidence of this correspondence has been submitted to the Council.

27.43 A site-wide heat network is proposed for Site B for the residential buildings, supplied by a centralised energy centre. The commercial building is proposed to be served by a separate energy centre. However, the building would also connect to the site-wide heat network in order to provide waste heat to the residential element. The carbon savings for site wide networks are considered under be green renewable energy for this application.

27.44 The applicant has provided a commitment that the development will be designed to allow future connection to a district heating network. This should include a single point of connection to the district heating network. Space for heat exchanger plant and route to the site boundary have been provided in Appendices of energy statement. This future connection can be secured through the **s106 legal agreement**.

27.45 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.

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

Be green stage (renewables)

27.47 CLP policy CC1 requires all developments to achieve a 20% reduction in CO_2 emissions through renewable technologies (after savings at Be Lean and Be Clean), where feasible, for the third stage in the energy hierarchy.

27.48 The proposed development for Site B significantly exceeds the policy target of 20%, reducing emissions by 47.5% through renewables. Again, the minimal commercial floorspace taken in isolation does not meet the policy target of 20% with a reduction of only 6.8%, but the high performance of the residential elements with 62.1% means that site-wide development meets the target overall.

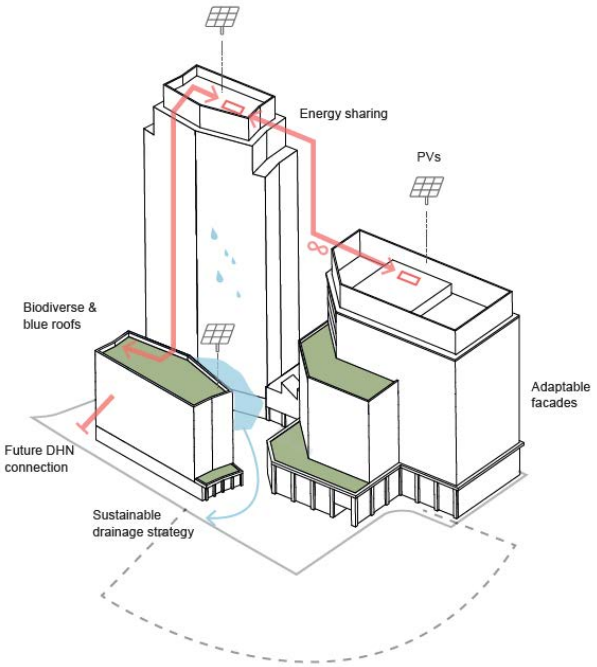


Figure 72 – green/biodiverse roofs are provided (yellow above) in addition to planting throughout the site including on accessible roof areas

27.49 254sqm of solar PV panels providing 47kWp would be provided on the roofs of Buildings B1 and B3. Other spare roof areas are utilised for plant and biodiverse/blue roofs, and as such it is considered that PV provision has been maximised. Details will be secured by condition.

27.50 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 amenity and retail spaces. 95% of the heat for the development would be provided by the ASHPs, except for the commercial building which would get all of its heat from ASHPs. Insulated pipework would be used to minimise distribution losses.

Be seen (energy monitoring)

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

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

Climate change adaption and sustainable design

27.53 Local Plan policy CC2 expects non-residential development over 500sqm to meet BREEAM Excellent.

27.54 The development proposal would achieve BREEAM New Construction Excellent for the non-domestic parts of the scheme. The Science and Technology building indicates an overall score of BREEAM excellent with 71% of the energy credits, 78% of the water credits and 93% of the materials credits which meets the requirements. It is also proposed to achieve BREEAM Residential of 3.5 stars (out of 5) with an aim of achieving a 4.5-star rating. This certification on both the residential and non-residential elements of the scheme is supported and shall be secured through **section 106 legal agreement**.

27.55 Dynamic Thermal Modelling has been undertaken for the residential units using CIBSE TM59 methodology with units modelled as naturally ventilated to demonstrate that passive measures pass the criteria if there were no restrictions.

27.56 89% (251 flats) of apartments on Site B require controls to mitigate against external noise. The applicant is proposing comfort cooling to the private sale homes in B1 as many of them have the potential to overheat due to their unobstructed exposure to sunlight at height. However further consideration of measures to reduce overheating risk should be considered and through MVHR. A condition is attached to ensure all passive measures and lower energy measures to reduce overheating are fully explored.

27.57 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.

27.58 For DSY2 and DSY3, which are future weather scenarios for a short intense warm spell and a long intense warm spell, that there are significant failures for some units, and in particular for Block B2 which does not have air conditioning. 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 additional measures should be incorporated into the design including external blinds to help mitigate this risk.

27.59 If additional overheating mitigation measures are feasible and with air tempering (but not air conditioning) the units in Block B1 pass all of the criterion for all DSY2 and DSY3 then air conditioning would not be justified. Assessment of this and the potential additional overheating prevention measures can be secured by condition.

27.60 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.

27.61 Biodiverse/green roofs are provided on each building. 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 73 – green/biodiverse roofs are provided (yellow above) in addition to planting throughout the site including on accessible roof areas

Conclusion

27.62 The proposed redevelopment demonstrates a comprehensive approach to sustainability and energy, aligning with both Camden and London Plan policies.

27.63 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.

27.64 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 partially in the Counters Creek catchment area with incidents of sewer flooding in the area. There are some areas of medium and high risk of surface water flooding along the eastern half, 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 proposes SuDS to manage the water environment, including blue and green on all feasible roof spaces. At ground floor level surface water is collected via permeable paving, a detention basin, and bioretention features where possible, cellular attenuation tanks are proposed to supplement primary SuDS features. The proposals include 850m2 of green/blue roofs providing 81m3 of storage, 941m2 of pervious pavements providing 137m3 of storage, 519m2 of basins/ponds providing 304m3 of storage and 143m3 of attenuation tanks. Conditions would ensure the final SuDS details are submitted and implemented (condition 32 and 33).

28.6 A runoff rate of 9.1l/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 143l/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 current site.

However, the proposed storage capacity of 665m3 is not sufficient to meet this discharge rate and therefore a condition is required to ensure that the drainage strategy provides adequate storage.

28.7 An evacuation routes diagram indicates that escape routes may not be dry. As such, a condition is attached that would require a 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 61).

28.8 Thames Water confirmed they have no objection in terms of the combined waste-water network capacity. However, they identified that the current water supply network cannot accommodate the needs of the development and so have requested a condition to ensure sufficient water supply capacity (condition 43).

28.9 Because the site lies within 15 metres of strategic sewers and strategic water mains, Thames Water require a condition securing submission and approval of a Piling Method Statement to ensure protection of underground water infrastructure (condition 23).

28.10 They also requested informatives about groundwater risk management, construction near their assets, both of which would be attached.

28.11 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 B is a large mixed-use scheme providing a significant amount of new homes and commercial floorspace. The mixed-use nature of the redevelopment means that the employment benefits of the scheme can be secured through both the end user and construction 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 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 **85 apprenticeships and a £144,500 financial contribution** over the course of the proposed 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 proposals include 1,326 sqm of incubator space within Site B provided at a rental discount which will reflect the operational model for early-stage science and technology ventures, where affordability is delivered through a combination of reduced rental levels, shared infrastructure, flexible

occupation arrangements and access to equipment and facilities that would otherwise be unaffordable to early-stage occupiers. Further detail on the operation of this space, including target occupiers, lease structures and the relationship to prevailing market rents, can be secured through the **Section 106 agreement**.

29.9 The proposals also include a 'mixer' space which includes 193 sqm of flexible space intended to support collaboration, engagement and skills-related activity. Free access will be secured for qualifying purposes which includes those which support education, skills, mentoring and community engagement activity aligned with Camden's STEAM and Inclusive Economy objectives. This includes, for example, careers events, workshops, school engagement and outreach activity delivered in partnership with local organisations.

29.10 The employment, skills and social value commitments for Site B will be embedded within the proposed management and operation of the building. Effective coordination and monitoring of these commitments will be required and appropriate mechanisms for delivery and reporting of these will be secured through the **Section 106 legal agreement**.

29.11 The proposed development at Site B is expected to generate 997 full time equivalent jobs once the development is fully built. End user apprenticeship placements and work experience placements will be secured and the exact number of these is under discussion. These will be secured through the **Section 106 legal agreement**.

29.12 The development has the potential to have a substantial positive impact on the local economy, both through economic activity related to the construction process and through the significant new commercial development on site. The commercial floorspace will provide many jobs and bring new businesses into the area, the incubator space will support start-ups and small businesses specifically in the science and technology field, and all this will support and promote the Knowledge Quarter ecosystem. The employment and training package will ensure that local residents benefit from jobs and training opportunities, which will also have long-term health benefits.

29.13 An employment and training contribution will also be confirmed which will be secured through the **Section 106 legal agreement**.

29.14 Given the above, the proposals are in accordance with the development plan 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 282 new homes, all meeting or exceeding national space standards and designed to be high quality, well-ventilated and energy efficient. This would include a high proportion (12%) of wheelchair-adaptable homes (M4(3)) with the remainder meeting accessible and adaptable standards (M4(2)), exceeding policy requirements. This will help residents live independently and reduce risks linked to overcrowding, cold homes and poor housing conditions.

30.4 The provision of market and intermediate homes would help to contribute to a balanced community with community cohesion, particularly when considered alongside the social-affordable rent homes to be provided on Site A (if permission were granted).

30.5 The HIA identifies that the King's Cross ward has a diverse population and pockets of significant deprivation. Several local areas are within the 20% most deprived nationally, particularly for crime, income and living environment. These factors are linked to poorer health outcomes and higher vulnerability. The ward also has high proportions of residents who do not speak English as their main language, and residents who cannot speak English well. This may affect access to health information and services.

30.6 There is existing pressure on local GP services in the area and Camden's Health and Wellbeing Strategy notes population growth and intensification as key risks for healthcare access.

30.7 With around 900 new residents resulting from Site B, the ES outlines that although not significant, the proposed development would result in an increased risk of strain on healthcare access without mitigation.

30.8 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, job opportunities, a safer environment, and high-quality accommodation designed to support independent living.

30.9 The development would also create significant new employment and training opportunities with around 530 new jobs as well as temporary construction employment and training, supporting local economic inclusion. A package of **local employment and training opportunities will be secured by s106 agreement**.

30.10 The scheme provides an uplift in outdoor space through the linear open space, Camley Square, and the Courtyard Garden. These spaces will increase opportunities for physical activity, social interaction and contact with nature. The design avoids gated layouts and supports inclusive access, with level routes and natural surveillance, with better access to green spaces linked to improved physical activity, reduced stress, and stronger social connection. Social connection is further promoted through the flexible “Mixer” space.

30.11 New pedestrian and cycle routes through Cedar Way will improve links to Agar Grove, Camley Street and the wider cycle network. 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 and mental wellbeing.

30.12 The scheme integrates Secured by Design principles, with active ground-floor frontages, good lighting, and clear sightlines across the public realm. These measures help reduce the risk and fear of crime, improving feelings of safety. This benefit is especially important for those who experience higher fear of crime which disproportionately affects women, older people, and ethnic minorities (all protected characteristics).

30.13 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. The retail/food units at ground floor level do not include any hot food takeaways which also helps avoid an unhealthy clustering of fast-food outlets which can particularly impact younger residents.

30.14 The main potential negative 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).

30.15 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 s106 agreement**.

Conclusion

30.16 The proposal is expected to have an overall positive impact on health and wellbeing. While there are existing pressures on local GP services, these impacts are manageable, and the scheme aligns with Camden's prevention focused approach by creating a healthier environment that reduces long term health risks. It delivers high-quality homes, commercial space, shops, improved access to open space and active travel routes, and inclusive and safe public spaces.

30.17 Although construction impacts will need careful management, these can be mitigated through the CMP and ongoing engagement.

30.18 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 and control the impact of the development. These heads of terms will mitigate any impact of the proposal on infrastructure in the area. They will be secured through a Section 106 agreement.

Affordable Housing

- 79 affordable homes on Site B
- All affordable homes as intermediate rent on Site B
- Agent of change
- Payment in lieu of £35,450,000

Affordable Workspace

- 1,326sqm of incubator space for science and technology ventures
- Community access plan for the 'mixer' space (193sqm)
- Incubator Workspace strategy to includes details of incubator space operator, occupiers, lease and marketing rates

Design

- Retention of project architect (Morris and Co)

Public Realm and Landscaping

- Public open space contribution of £TBC
- Landscaping and public realm delivery plan
- Public space and public realm management and maintenance plan including compliance with Public London Charter
- Wind mitigation strategy for south-western corner of Agar Grove Estate
- Feasibility study for improvements to railway underpass and use of other arches in viaduct for pedestrian movement
- Towpath improvements to Regent's Canal of £TBC

Energy and Sustainability

- Energy and sustainability strategy including reference to the following targets:
- Total carbon reductions of minimum 54.1%
- Be green stage reductions of minimum 47.5%
- Be lean stage reductions of minimum 12.6%
- Be seen stage energy monitoring and reporting
- Carbon offset payment of £693,365
- 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
- Pedestrian, cycling and environmental contribution of £TBC
- Travel plan (employment)
- Travel plan (residential)
- Travel plan monitoring and measures contribution of £22,696
- 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 management 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 £100,000
- Provision of 9 accessible parking bays and loading bays on Camley Street

Employment and training

- Employment and training plan
- Employment and training contribution of £TBC
- 85 construction apprenticeships provided through the King's Cross CSC
- Apprenticeships support contribution of £144,500
- Construction apprenticeship management plan
- Construction work experience placements – number TBC
- End user apprenticeships – number TBC
- Work experience placements – number TBC
- Local employment – 20% construction jobs recruited locally
- Local procurement – 20% procurement from local organisations
- Revised Social Value Charter Plan developed with the Council's Inclusive Economy team
- Ongoing engagement with the Inclusive Business Network, Good Work Camden and Council's Inclusive Economy Service
- Camden STEAM and Good Work Camden commitments
- Commitment to Social Value Charter Delivery Officer for ten years

32. COMMUNITY INFRASTRUCTURE LEVY (CIL)

32.1 The CIL applies to all proposals which add 100m^2 of new floorspace or an extra dwelling. The amount to pay is the increase in floorspace (m^2) 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) as it includes the addition of private residential units and new commercial space. 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 **£4,561,003** and this is based on the submitted plans and provision of a research and development end use (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 **£8,082,122** and this is based on the submitted plans and provision of a research and development end use (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.

33. CONCLUSION

33.1 The proposed development would make the best use of this brownfield site by achieving optimised and higher density development which will deliver a significant amount of commercial floorspace to support growth of the Knowledge Quarter and much needed new homes. This accords with local, regional and national policy in the form of the NPPF, importantly it aligns with the ambitions of the emerging site allocation S6 of the Draft Local Plan which is a material consideration and envisages significant transformation of mix of uses and character of the site. The proposed development would result in the loss of existing industrial uses, but it provides alternative commercial floorspace which is more compatible with the proposed residential and will provide more job opportunities.

33.2 The development would provide 282 homes with 79 intermediate rent homes (15% of the total by unit) and 203 homes for market sale. These homes make a significant contribution towards the Council's housing targets and in alleviating the demand for affordable housing. The new homes would be of a high quality with energy demand minimised. Across both Site A (where affordable housing is over-provided) and Site B the proposals taken together are policy-compliant in terms of their affordable housing provision on public land with 52% affordable housing provided by habitable room (50% by areas and 49% by unit). This multi-site arrangement is considered acceptable in principle and is supported by the Greater London Authority. Policy-compliance will be secured through a S106 legal agreement, but not by linking delivery of the two sites which is the standard approach, but instead by securing a payment in lieu of the social-affordable housing on Site B, this is effectively payment for sale of the land which is secured by development agreement and will then be used by CIP to enable the delivery of the proposed development and affordable housing on Site A. The affordable housing to be delivered on Site B will also be secured by S106 agreement.

33.3 Officers have identified some less than substantial harm from the development 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. For Site B the principal heritage impact is on the Grade I Listed All Saints Greek Orthodox Church, for which there is less than substantial harm at the medium point on the scale to the setting. Other heritage assets

such as nearby conservation areas are also affected at the lower and very low end of the scale by the proposed development on Site B. 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 substantial social, environmental and economic benefits including new housing and affordable housing, retail and food/drink facilities, community access to the tech hub building, an improved public realm including a new public square, energy efficient development and a package of social value measures the value of which would exceed £1million over ten years.

33.4 Building B1 would be the tallest building at 31 storeys, with the scale and massing of the buildings on site being a significant increase on the existing situation. This 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 relatively small number of properties which for a scheme of this scale in an urban area is considered acceptable, given the wider benefits this application would provide both economically and in terms of new housing and affordable housing. The existing low-rise nature of the existing buildings also mean that any scheme is likely to have impacts.

33.5 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 through a CMP and with continuous engagement secured through a CWG.

33.6 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 and street lighting.

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

33.8 The scheme complies with the development plan as a whole and therefore the recommendation is to grant permission.

34. RECOMMENDATION

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

35. LEGAL COMMENTS

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

1.	Implementation The development hereby permitted must be begun not later than the end of three years from the date of this permission. Reason: In order to comply with the provisions of Section 91 of the Town and Country Planning Act 1990 (as amended)
2.	Approved drawings The development hereby permitted shall be carried out in accordance with the following approved drawings and supporting documents: 23065 CAM - MCO - BX - 00 - DR - A - 05001 _ _ _ Site B Site Location Plan - Existing 1:1250 A1L B1+B2 23065 CAM - MCO - BX - ZZ - DR - A - 05002 _ _ _ Site B Site Plan - Existing 1:250 A1L B1+B2 23065 CAM - MCO - BX - ZZ - DR - A - 05300 _ _ _ Site B - Site Sections - Existing 1:250 A1L B1+B2 23065 CAM - MCO - BX - ZZ - DR - A - 06001 _ _ _ Site B Site Location Plan - Proposed 1:500 A1L B1+B2 23065 CAM - MCO - BX - 00 - DR - A - 06002 _ _ _ Site B Ground Floor Plan - Proposed 1:250 A1L B1+B2 23065 CAM - MCO - BX - ZZ - DR - A - 06003 _ _ _ Site B Roof Plan - Proposed 1:250 A1L B1+B2 23065 CAM - MCO - BX - ZZ - DR - A - 06250 _ _ _ Site B Site Elevation North - Proposed 1:250 A1L B1+B2 23065 CAM - MCO - BX - ZZ - DR - A - 06251 _ _ _ Site B Site Elevation East - Proposed 1:250 A1L B1+B2 23065 CAM - MCO - BX - ZZ - DR - A - 06252 _ _ _ Site B Site Elevation South - Proposed 1:250 A1L B1+B2 23065 CAM - MCO - BX - ZZ - DR - A - 06253 _ _ _ Site B Site Elevation West - Proposed 1:250 A1L B1+B2 23065 CAM - MCO - BX - ZZ - DR - A - 06350 _ _ _ Site B Site Section AA - Proposed 1:500 A1L B1+B2 23065 CAM - MCO - BX - ZZ - DR - A - 06351 _ _ _ Site B Site Section BB - Proposed 1:500 A1L B1+B2 23065 CAM - MCO - BX - ZZ - DR - A - 06352 _ _ _ Site B Site Section CC - Proposed 1:500 A1L B1+B2 23065 CAM - MCO - BX - ZZ - DR - A - 06353 _ _ _ Site B Site Section DD - Proposed 1:500 A1L B1+B2 23065 CAM - MCO - BX - 00 - DR - A - 06100 _ _ _ B1+B2 - Ground Floor Plan - Proposed 1:150 A1L B1+B2 23065 CAM - MCO - BX - 01 - DR - A - 06101 _ _ _ B1+B2 - 1st Floor Plan - Proposed 1:150 A1L B1+B2

	23065 CAM - MCO - BX - 02 - DR - A - 06102 _ _ _ B1+B2 - 2nd Floor Plan - Proposed 1:150 A1L B1+B2 23065 CAM - MCO - BX - 03 - DR - A - 06103 _ _ _ B1+B2 - 3rd Floor Plan - Proposed 1:150 A1L B1+B2 23065 CAM - MCO - BX - 04 - DR - A - 06104 _ _ _ B1+B2 - 4th-7th Floor Plan - Proposed 1:150 A1L B1+B2 23065 CAM - MCO - BX - 08 - DR - A - 06108 _ _ _ B1+B2 - 8th Floor Plan - Proposed 1:150 A1L B1+B2 23065 CAM - MCO - BX - 09 - DR - A - 06109 _ _ _ B1+B2 - 9th-19th Floor Plan - Proposed 1:150 A1L B1+B2 23065 CAM - MCO - BX - 20 - DR - A - 06120 _ _ _ B1+B2 - 20th-26th Floor Plan - Proposed 1:150 A1L B1+B2 23065 CAM - MCO - BX - 27 - DR - A - 06127 _ _ _ B1+B2 - 27th-29th Floor Plan - Proposed 1:150 A1L B1+B2 23065 CAM - MCO - BX - 30 - DR - A - 06130 _ _ _ B1+B2 - 30th Floor Plan - Proposed 1:150 A1L B1+B2 23065 CAM - MCO - BX - R1 - DR - A - 06131 _ _ _ B1+B2 - Roof Plan - Proposed 1:150 A1L B1+B2 23065 CAM - MCO - BX - B1 - DR - A - 06132 _ _ _ B1+B2 - Basement Plan - Proposed 1:150 A1L B1+B2 23065 CAM - MCO - B1 - ZZ - DR - A - 06200 _ _ _ B1 North Elevation - Proposed 1:150 A1P B1+B2 23065 CAM - MCO - B1 - ZZ - DR - A - 06201 _ _ _ B1 East Elevation - Proposed 1:150 A1P B1+B2 23065 CAM - MCO - B1 - ZZ - DR - A - 06202 _ _ _ B1 South Elevation - Proposed 1:150 A1P B1+B2 23065 CAM - MCO - B1 - ZZ - DR - A - 06203 _ _ _ B1 West Elevation - Proposed 1:150 A1P B1+B2 23065 CAM - MCO - B1 - ZZ - DR - A - 06300 _ _ _ B1 Section AA - Proposed 1:150 A1P B1+B2 23065 CAM - MCO - B1 - ZZ - DR - A - 06301 _ _ _ B1 Section BB - Proposed 1:150 A1P B1+B2 23065 CAM - MCO - B1 - ZZ - DR - A - 06400 _ _ _ B1 Unit Layouts - Proposed 1:50 A1L B1+B2 23065 CAM - MCO - B1 - ZZ - DR - A - 06401 _ _ _ B1 Unit Layouts - Proposed 1:50 A1L B1+B2 23065 CAM - MCO - B1 - ZZ - DR - A - 06402 _ _ _ B1 Unit Layouts - Proposed 1:50 A1L B1+B2 23065 CAM - MCO - B1 - ZZ - DR - A - 06403 _ _ _ B1 Unit Layouts - Proposed 1:50 A1L B1+B2 23065 CAM - MCO - B1 - ZZ - DR - A - 06404 _ _ _ B1 Unit Layouts - Proposed 1:50 A1L B1+B2 23065 CAM - MCO - B1 - ZZ - DR - A - 06405 _ _ _ B1 Unit Layouts - Proposed 1:50 A1L B1+B2 23065 CAM - MCO - B1 - ZZ - DR - A - 06406 _ _ _ B1 Unit Layouts - Proposed 1:50 A1L B1+B2 23065 CAM - MCO - B1 - ZZ - DR - A - 06450 _ _ _ B1 Cycle Storage 1:75 A1L B1+B2

	23065 CAM - MCO - B1 - ZZ - DR - A - 06500 _ _ _ B1 Typical Bay Study - Proposed 1:25 A1L B1+B2 23065 CAM - MCO - B2 - ZZ - DR - A - 06240 _ _ _ B2 - North Elevation - Proposed 1:150 A1P B1+B2 23065 CAM - MCO - B2 - ZZ - DR - A - 06241 _ _ _ B2 - East Elevation - Proposed 1:150 A1P B1+B2 23065 CAM - MCO - B2 - ZZ - DR - A - 06242 _ _ _ B2 - South Elevation - Proposed 1:150 A1P B1+B2 23065 CAM - MCO - B2 - ZZ - DR - A - 06243 _ _ _ B2 - West Elevation - Proposed 1:150 A1P B1+B2 23065 CAM - MCO - B2 - ZZ - DR - A - 06340 _ _ _ B2 - Section AA - Proposed 1:150 A1P B1+B2 23065 CAM - MCO - B2 - ZZ - DR - A - 06341 _ _ _ B2 - Section BB - Proposed 1:150 A1P B1+B2 23065 CAM - MCO - B2 - ZZ - DR - A - 06420 _ _ _ B2 Unit Layouts - Proposed 1:50 A1L B1+B2 23065 CAM - MCO - B2 - ZZ - DR - A - 06421 _ _ _ B2 Unit Layouts - Proposed 1:50 A1L B1+B2 23065 CAM - MCO - B2 - ZZ - DR - A - 06451 _ _ _ B2 Cycle Storage 1:75 A1L B1+B2 23065 CAM - MCO - B2 - ZZ - DR - A - 06501 _ _ _ B2 Typical Bay Study - Proposed 1:25 A1L B1+B2 24050 CAM - MCO - B3 - 00 - DR - A - 06160 _ _ _ Plot B3 - Ground Floor Plan - Proposed 1:150 A1P B3 24050 CAM - MCO - B3 - 01 - DR - A - 06161 _ _ _ Plot B3 - 1st Floor Plan - Proposed 1:150 A1P B3 24050 CAM - MCO - B3 - 02 - DR - A - 06162 _ _ _ Plot B3 - 2nd Floor Plan - Proposed 1:150 A1P B3 24050 CAM - MCO - B3 - 03 - DR - A - 06163 _ _ _ Plot B3 - 3rd Floor Plan - Proposed 1:150 A1P B3 24050 CAM - MCO - B3 - 09 - DR - A - 06169 _ _ _ Plot B3 - 9th Floor Plan - Proposed 1:150 A1P B3 24050 CAM - MCO - B3 - 12 - DR - A - 06172 _ _ _ Plot B3 -12th Floor Plan - Proposed 1:150 A1P B3 24050 CAM - MCO - B3 - B1 - DR - A - 06173 _ _ _ Plot B3 - Basement Plan - Proposed 1:150 A1P B3 24050 CAM - MCO - B3 - R1 - DR - A - 06174 _ _ _ Plot B3 - Lower Roof Plant Plan - Proposed 1:150 A1P B3 24050 CAM - MCO - B3 - R2 - DR - A - 06175 _ _ _ Plot B3 - Upper Roof Plant Plan - Proposed 1:150 A1P B3 24050 CAM - MCO - B3 - R3 - DR - A - 06176 _ _ _ Plot B3 - Roof Plan - Proposed 1:150 A1P B3

	24050 CAM - MCO - B3 - ZZ - DR - A - 06260 _ _ _ Plot B3 - North Elevation - Proposed 1:150 A1P B3 24050 CAM - MCO - B3 - ZZ - DR - A - 06261 _ _ _ Plot B3 - East Elevation - Proposed 1:150 A1P B3 24050 CAM - MCO - B3 - ZZ - DR - A - 06262 _ _ _ Plot B3 - South Elevation - Proposed 1:150 A1P B3 24050 CAM - MCO - B3 - ZZ - DR - A - 06263 _ _ _ Plot B3 - West Elevation - Proposed 1:150 A1P B3 24050 CAM - MCO - B3 - ZZ - DR - A - 06360 _ _ _ Plot B3 - Section AA - Proposed 1:150 A1P B3 24050 CAM - MCO - B3 - ZZ - DR - A - 06361 _ _ _ Plot B3 - Section BB - Proposed 1:150 A1P B3 24050 CAM - MCO - B3 - ZZ - DR - A - 06362 _ _ _ Plot B3 - Section CC - Proposed 1:150 A1P B3 24050 CAM - MCO - B3 - ZZ - DR - A - 06363 _ _ _ Plot B3 - Section DD - Proposed 1:150 A1P B3 24050 CAM - MCO - B3 - ZZ - DR - A - 06560 _ _ _ Plot B3 - Typical Bay - Proposed 1:20 A1L B3 23065 CAM - MCO - XX - XX - SH - A - 21201 _ _ _ Area Schedule NTS A3L N/A 23065 CAM - MCO - XX - XX - SH - A - 02001 _ _ _ Stage 2 Drawing Register NTS A3L N/A CAM-SPA-BX-00-DR-L-94201 CAM-SPA-BX-01-DR-L-94201 CAM-SPA-BX-02-DR-L-94201 CAM-SPA-BX-09-DR-L-94201 CAM-SPA-BX-RL-DR-L-94201 Reason: For the avoidance of doubt and in the interest of proper planning.
3.	Detailed drawings 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: 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; 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. J) Detailed drawings, including plans, coloured elevations and sections at 1:20 of all entrances. To include any ventilation grills, parapets and associated feature elements and lighting fixtures; K) Physical samples of sculpted columns/ piers (minimum 1m x 1m in size), showing profile, materiality, tonality and grain. L) Physical sample panels of precast concrete elements, showing materiality, tonality and grain; viewed as a companion material to the metalwork and brickwork. M) Physical sample of spandrel panels (minimum 1m x 1m in size), showing profile, coating tonality, grain and joinery details. The development shall be thereafter built in accordance with the approved details. 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.
4.	Material samples 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

	and key junctions and colour tonality. The development hereby permitted shall be thereafter built in accordance with the approved details. Reason: To ensure that the external appearance of the building is satisfactory in accordance with policy D1 and D2 of the Camden Local Plan 2017.
5.	External fixtures 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, without the prior approval in writing of the local planning authority. 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.
6.	Secure by design (a) Prior to above ground construction works (excluding demolition and site preparation 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. (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. Once approved the details shall be implemented in full and retained for perpetuity, unless otherwise agreed in writing by the local planning authority. 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.
7.	Use class restrictions 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 specific use classes as follows, and for no other purposes whatsoever unless first agreed in writing in advance by the local planning authority. Building B2 – Class E(a)/(b) Building B3 – Class E(g)/B8

	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.
8.	Hours of use 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 unless otherwise agreed in writing by the local planning authority. 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.
9.	Mechanical ventilation Prior to commencement of development (excluding demolition 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. Reason: To safeguard the amenity of occupants in accordance with policy A1 and CC4 of the Camden Local Plan 2017, and policy GG3 and SI1 of the London Plan 2021.
10.	NO2 filtration Prior to first 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. 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.
11.	Air quality At least 3 months prior to the commencement of any development on site the following shall be submitted and approved in writing 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, 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. 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.
12.	Back-up generators Prior to the commencement of above ground works (excluding demolition and site preparation works) details of the proposed Emergency Diesel Generator Plant (or any alternative means of back-up power generation, if feasible)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 submitted to and approved by the Local Planning Authority in writing following installation and thereafter every three years to verify compliance with regulations made by the Secretary of State. 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.
13.	Generator testing and operation resident alert system Prior to occupation evidence that an appropriate system to manage alerts of generator testing and operation to residents has been established and will be maintained thereafter. This should be submitted to the Local Planning

	Authority and approved in writing. Thereafter the number of alerts to residents should be reported quarterly to the Local Planning Authority and access to data provided on request. Reason: To protect the amenity of residents in accordance with London Borough of Camden Local Plan Policy CC4 and London Plan policy 7.14.
14.	Monitoring railway emissions Prior to commencement of above ground works (excluding demolition and site preparation) automatic real-time NO2 and PM air quality monitoring of site B 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 implemented prior to occupation, retained and maintained thereafter. Details shall have been submitted to and approved by the Local Planning Authority in writing. Reason: To safeguard the amenity of occupants in accordance with policy A1 and CC4 of the Camden Local Plan 2017, and policy GG3 and SI1 of the London Plan 2021.
15.	Lab flues Prior to occupation of the Life Sciences building (Building B3) details of the proposed Laboratory Flues, any associated abatement technologies, potential emission details and dispersion modelling shall have been submitted to and approved by the Local Planning Authority in writing. The flue should be located away from air inlet locations. The maintenance and cleaning of the systems shall be undertaken regularly in accordance with manufacturer specifications. 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..
16.	AQ monitoring 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 airquality@camden.gov.uk 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. 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.
17.	Roof terraces – commercial floorspace The use of the roof terraces associated with the commercial use shall not be carried out outside the following times 0730-2100 Mondays to Saturdays and 0830- 2000 on Sundays and Bank Holidays. Reason: To safeguard the amenities of the nearest residential properties and the area generally in accordance with the requirements of policies G1, A1, A4 and TC2 of the London Borough of Camden Local Plan 2017.
18.	Waste storage and removal Prior to the commencement of above ground works (excluding demolition and site preparation works) 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. 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.
19.	Delivery and refuse management 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. 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.
20.	Fire safety

	The development must be implemented in accordance with the provisions of the Fire Strategy Report (Revision P02), dated 11/09/2025, produced by Ashton Fire, and the Fire Statement (Revision P02), dated 11/09/2025 (revision list) and 12/09/2025 (cover sheet), produced by Ashton Fire. 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.
21.	Fire appliance access 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 each building which forms part of this site. The development and any interim access arrangements during construction shall be carried out and provided for in accordance with the approved details. 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.
22.	Cycle parking Prior to commencement of above ground works (excluding demolition and site preparation works) details of long and short stay bicycle parking including details of electric bike parking shall be submitted to and approved in writing by the Local Planning Authority. Thereafter the development should be completed in accordance with the approved detailed and maintained and retained as such. 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.
23.	Basement engineer No development shall commence (excluding demolition and site preparation works) until such time as a suitably qualified chartered engineer with membership of the appropriate professional body has been appointed and their appointment details and responsibilities have been submitted to and approved in writing by the Local Planning Authority. The appointed engineer

	shall inspect, approve and monitor the critical elements of both permanent and temporary basement construction works throughout their duration to ensure compliance with the design which has been checked and approved by a building control body and the basement works shall not proceed at any time unless such monitoring is in place. Any subsequent change or reappointment shall be confirmed forthwith for the duration of the construction works. Reason: To safeguard the appearance and structural stability of neighbouring buildings and the character of the immediate area in accordance with the requirements of policies D1, D2 and A5 of the London Borough of Camden Local Plan 2017.

24.	Basement impact The development shall not be carried out other than in strict accordance with the methodologies, recommendations and requirements of the Basement Impact Assessment Revision P03 dated December 2025 (as reviewed by BIA Audit by Campbell Reith Rev. D1 dated December 2025) hereby approved, which confirm that at the detailed design stage the damage impact assessment would be limited to Burland Category 1. Reason: To ensure proper consideration of the structural stability of neighbouring buildings and to safeguard the appearance and character of the immediate area in accordance with the requirements of policies D1 and A5 of the London Borough of Camden Local Plan 2017.
25.	Piling Method Statement (Thames Water) 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. 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.
26.	Non-road mobile machinery 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. 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). 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.

27.	Biodiversity enhancements Prior to the commencement of above ground works of each building (excluding demolition and site preparation works) 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. 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.
28.	Biodiversity gain plan 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). 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.
29.	Habitat Management and Monitoring Plan 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. 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.
30.	Completion of biodiversity enhancements

	Prior to 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. 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.
31.	Breeding bird protection No demolition or 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. Reason: In order to ensure the development safeguards protected and priority species in accordance with policy A3 of the Camden Local Plan 2017.
32.	Network rail boundary 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 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. Reason: To protect local transport infrastructure in accordance with policies T1 and T4 of the Camden Local Plan 2017.
33.	Solar panels Prior to commencement of above ground works (excluding demolition and site preparation works) drawings and data sheets showing the location, extent (at least 331m2) 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. 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.
34.	SuDS and drainage: Final details 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 850m2 of green/blue roofs providing 81m3 of storage, 941m2 of pervious pavements providing 137m3 of storage, 519m2 of basins/ponds providing 304m3 of storage and 143m3 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 9.1 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: - The proposed SuDS or drainage measures including adequate storage capacities - The proposed surface water discharge rates or volumes Systems shall thereafter be retained and maintained in accordance with the approved details. 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.
35.	SuDS: Evidence of installation Prior to first 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.

	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.
36.	Overheating risk Prior to the commencement of above ground works (excluding demolition and site preparation works) details of 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. 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.
37.	Further 'Be lean' reductions Prior to commencement of above-ground works (excluding demolition and site preparation works) details of 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. 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.
38.	Water efficiency 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.

	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.
39.	Circular economy delivery The Circular Economy Statement as approved (Cedar Way Circular Economy Statement by Temple Sept 2025 and addendum by 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. 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.
40.	Whole life carbon Prior to the stages outlined below an updated version of the Whole Life Carbon Assessment must be submitted to and approved in writing by the Local Planning Authority: (a) Prior to commencement of any work on site including all works of deconstruction and demolition. (b) Prior to commencement of any construction works. Whole life carbon should be minimised where feasible. Where the updated assessment submitted pursuant to (a) or (b) above identifies that changes to the design, procurement or delivery of the approved development will result in an increase in embodied carbon (A1-A5) above 734kgCO2e/m2 and/or Whole Life Carbon (A1-C4) above 897kgCO2e/m2 for Building B1, above 608kgCO2e/m2 and/or Whole Life Carbon (A1-C4) above 793kgCO2e/m2 for Building B2 and above 532kgCO2e/m2 and/or Whole Life Carbon (A1-C4) above 750kgCO2e/m2 for Building B3 which are the benchmarks established by your application stage Whole Life Carbon assessment, you must identify measures that will ensure that the additional carbon footprint of the development will be minimised. Work must not commence on site (as appropriate pursuant parts (a) and (b) above) until the Council has approved the updated assessment you have sent us. Works shall then be carried out, as permitted by the relevant part of the condition, in accordance with the updated version of the Whole Life Carbon assessment that we have approved. 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.
41.	Whole life carbon – post-construction 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. 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.
42.	Circular Economy (Waste) Prior to first occupation, the likely destination of all waste streams and confirmation that the destination landfill has capacity in respect of the waste from that building shall be submitted to and approved in writing by the Local Planning Authority (in consultation with the GLA). 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.
43.	Circular Economy (post-completion report) Prior to first 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. 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.
44.	Waste storage The waste and recycling storage shown on the approved plans and documents shall be provided for each of the residential and non-residential uses within a plot, prior to the occupation of the relevant use in that block. It shall thereafter be retained for the duration of the development for its designated use. Reason: 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.
45.	Water capacity (Thames Water)

	No development shall be occupied until confirmation has been provided that either: - all water network upgrades required to accommodate the additional demand to serve the development have been completed; or - 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. 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 Plan.
46.	Water main protection or diversion No development 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 development 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. 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.
47.	Utilities review 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. 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.

48.	Wind mitigation Prior to first occupation full details of wind mitigation measures for public realm and all spaces surrounding the building (including but not exclusively probe locations 4, 15, 21, 23, 26 and 39) to ensure wind conditions are minimised to allow spaces to be used for their intended purpose, 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. Reason: 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.
49.	Archaeology 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. 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: 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 B. Where appropriate, details of a programme for delivering related positive public benefits C. The programme for post-investigation assessment and subsequent analysis, publication & 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. Reason: Reason: To protect local heritage in accordance with policy D2 of the Camden Local Plan 2017.

50.	Solar glare Prior to commencement of above-ground works (excluding demolition and site preparation works) 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. Reason: Reason: To protect local transport infrastructure in accordance with policy T3 of the Camden Local Plan 2017.
51.	Signal sighting assessment Prior to the commencement of development, 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: • Assess impacts during construction (temporary lighting/equipment) and post-construction (façade materials/permanent lighting) on signals NL1111, NL1112, NL1210, NL121, and NL1213. • Include a Glint and Glare Assessment • 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. • Confirm how safe and continued access will be maintained to the pedestrian railway access point at Maiden Lane Substation (BOK1 4mi 1106yds). 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. Reason: To protect local transport infrastructure in accordance with policy T3 of the Camden Local Plan 2017.
52.	Land contamination site investigation 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. 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.

	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.
53.	Land contamination remediation 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. 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.
54.	Land contamination verification 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. 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.
55.	Noise controls Prior to commencement of above-ground works (excluding demolition and site preparation works) details shall be 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. 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.
56.	Equipment noise controls 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. 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.
57.	Equipment vibration controls Prior to first use of machinery, plant or equipment at the development, it shall be mounted with proprietary anti-vibration isolators and fan motors shall be vibration isolated from the casing and adequately silenced, and they shall be permanently maintained and retained as such thereafter. 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.
58.	Vibration protection The development shall be designed and constructed so as to ensure that vibration dose values do not exceed 0.4m/s1.75 between 07.00 and 23.00 hours, and 0.26m/s1.75 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. 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.
59.	Noise levels The noise level in 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'. 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.
60.	Lighting strategy Prior to the commencement of above ground works (excluding demolition and site preparation works) 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 the development as necessary. The lighting plan shall be followed thereafter for the development in perpetuity. Reason: To protect residential amenity, ensure a safe and secure environment and to protect biodiversity in accordance with policy A1, A3 and C5 of the London Borough of Camden Local Plan.
61.	CMS for Network Rail 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): •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. •Full details of any piling, deep excavation, or ground engineering works and their potential impact on the operational railway. 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.

	Reason: To protect local transport infrastructure in accordance with policy T3 of the Camden Local Plan 2017.
62.	Flood Risk Emergency Plan 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: - suitable routes for emergency vehicle access with suitable mapping and figures, - pedestrian routes should not be subject to any combination of depth and velocity that would result in a flood hazard rating1 of 0.75 ('danger for some') or greater, and - details of signage required along the main emergency egress route, which is not predicted to be dry in extreme rainfall events. 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 and maintained thereafter. Reason: To protect the occupants in the event of a flood in accordance with policy CC3 of the London Borough of Camden Local Plan.

63.	New vehicular accesses to be provided The new vehicular accesses to the site shall be installed prior to the commencement of the use hereby permitted, in accordance with the approved plans. Reason: To minimise danger, obstruction and inconvenience to users of the highway in accordance with policies A1 and T3 of the Camden Local Plan 2017.
64.	Tree protection 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. Reason: Development must not commence before this condition is discharged to ensure the retention of, and avoid irrevocable damage to, the retained trees 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.
65.	Landscaping 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 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. Reason: In the interests of ecological value and visual amenity in accordance with policies A2, A3, A5, D1 of the Camden Local Plan 2017.
66.	Mechanical ventilation and heat pumps Prior to commencement of development, full details of air source heat pumps (ASHPs) and any mechanical ventilation shall be submitted to and approved by the local planning authority. The details shall demonstrate the ASHP system and any ventilation either has no active cooling function, or cooling has been deactivated by the manufacturer, or that it is an air to water heat pump system only supplying underfloor heating and/or oversized radiators.

	The measures shall be fully provided in accordance with the approved details and thereafter retained and maintained in accordance with the approved scheme, and no other system of active cooling shall be implemented. Reason: In order to minimise energy consumption and following the energy and cooling hierarchies, in accordance with policies CC1, CC2, D1 of the Camden Local Plan 2017.
67.	Green/blue roofs Prior to commencement of development, full details in respect of the living/green/blue roof(s) on each block shall be submitted to and approved by the local planning authority. The details shall include: (i) a detailed scheme of maintenance; (ii) sections at a scale of 1:20 with manufacturer's details demonstrating the construction and materials used; (iii) variation of substrate depth with peaks and troughs where appropriate: and (iv) full details of planting species and density. The living/green/blue roofs shall be fully provided in accordance with the approved details prior to first occupation and thereafter retained and maintained in accordance with the approved scheme. Reason: In order to ensure the development undertakes reasonable measures to take account of biodiversity and the water environment in accordance with policies CC1, CC2, CC3, CC4, D1 and A3 of the Camden Local Plan 2017.
68.	Urban greening factor Prior to the first occupation of the development full details of the urban greening factor proposals for the development shall be submitted for the written approval of the Council. The proposals should demonstrate that steps have been taken to maximise the greening factor achievable on the site to meet a factor of 0.4 if possible and to achieve a minimum of 0.35. Reason: In accordance with the urban greening objectives of Policy G5 of the London Plan 2021.
69.	Accessible homes The development hereby approved shall include 35 (12%) accessible homes. 12 intermediate homes shall be designed to meet the requirements of Part M4(3)(2)(a) of the Building Regulations. All other accessible homes shall be the requirements of Part M4(3) of the Building Regulations. All remaining residential units hereby permitted shall be constructed to comply with Part M4(2) of the Building Regulations. 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.

70.	Active cooling 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. 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.

INFORMATIVES:

1.	Biodiversity Net Gain (BNG) Informative (1/3): 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: (a) a Biodiversity Gain Plan has been submitted to the planning authority, and (b) the planning authority has approved the plan. The local planning authority (LPA) that would approve any Biodiversity Gain Plan (BGP) (if required) is London Borough of Camden. 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. 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.
2.	Biodiversity Net Gain (BNG) Informative (2/3): + Summary of transitional arrangements and exemptions for biodiversity gain condition. The following are provided for information and may not apply to this permission: 1. The planning application was made before 12 February 2024. 2. The planning permission is retrospective. 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.

	4. The permission is exempt because of one or more of the reasons below: - 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. - 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). - The application is a Householder Application. - It is for development of a "Biodiversity Gain Site". - 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). - It forms part of, or is ancillary to, the high-speed railway transport network (High Speed 2).
3.	Biodiversity Net Gain (BNG) Informative (3/3): + Irreplaceable habitat: 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. + The effect of section 73(2D) of the Town & Country Planning Act 1990 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. + Phased development 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.
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.	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 www.camden,gov.uk) 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) 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.
8.	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.
9.	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 www.camden.gov.uk/cil 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.
10.	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: assetprotectioneastern@networkrail.co.uk and AssetProtectionAnglia@networkrail.co.uk. The following items will need to be considered as part of the Asset Protection Agreement. • 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. •Plant/Equipment: No plant, machinery, or compound collapse radius should be within 4m of the railway boundary. •Temporary Works: Any scaffolding or temporary structures will require ASPRO assurance. •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. •TfL Consultation: TfL should be consulted, and a tunnel/structures impact assessment may be necessary due to foundation and piling works.
11.	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 the consultation response received from Historic England (copy available on the planning file).
12.	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 trade.effluent@thameswater.co.uk . Application forms should be completed online via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.
13.	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. 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. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes

	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 thameswater.co.uk/buildingwater.
14.	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.
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 https://beta.camden.gov.uk/web/guest/construction-management-plans 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, http://www.camden.gov.uk/ccm/content/contacts/council-contacts/environment/contact-the-contaminated-land-officer.en, and that this information can form the basis of a preliminary risk assessment. Further information is also available on the Council's Contaminated Land web pages at http://www.camden.gov.uk/ccm/navigation/environment/pollution/contaminated-land/, or from the Environment Agency at www.environment-agency.gov.uk.