

## **Town Planning Statement**

100 and 100a Chalk Farm Road, London, NW1 8EH

On behalf of Regal Chalk Farm Limited  
February 2024

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# 1 Executive Summary

1.1 This Town Planning Statement ('Statement') has been prepared by Gerald Eve LLP on behalf of Regal Chalk Farm Road Limited (herein referred to as 'the Applicant'). It supports an application for full planning permission to redevelop 100 and 100a Chalk Farm Road (herein referred to as 'the Site').

1.2 Planning permission is being sought for the following:

*"Demolition of existing buildings and redevelopment of the site to provide two buildings containing purpose-built student accommodation with associated amenity and ancillary space (Sui Generis), affordable residential homes (Class C3), ground floor commercial space (Class E) together with public realm, access, servicing, and other associated works."*

1.3 The proposed development will provide 265 student accommodation units, together with 824 sqm (GIA) of commercial space, 24 affordable residential units, with public realm improvements, new areas of landscaping, amenity and play space, and improved accessibility to the site.

1.4 This Statement provides a comprehensive review and analysis of national, regional, local and neighbourhood planning policy and guidance which applies to the Proposed Development. It sets out the planning case for the scheme, having full regard to Development Plan policies and other material considerations and should be read in conjunction with the other supporting documents submitted in support of the Application.

1.5 The Applicant's vision is to realise the full potential of this vacant, underutilised and inefficient site on the edge of Camden Town and bring forward an exemplar mixed use sustainable scheme with public realm that contributes positively to the area, while respecting the integrity of the adjacent Grade II\* listed Roundhouse in terms of its setting.

1.6 As local custodians in the area, the Applicant has introduced a meanwhile use to maintain an active presence during the vacancy of the building following One Housing's departure.

1.7 Camden Council recognises the strategic importance of the site as part of the wider Camden Goods Yard area – as set out in the Planning Framework new development will create a

**“significant opportunity to radically enhance this important part of Camden Town Centre and create an inviting gateway to existing and new neighbourhoods”.** This is reflected in the site allocation in the Draft Local Plan which supports development with a variety of uses, that brings better engagement between the site and Chalk Farm Road and enhances the setting of the Roundhouse in particular.

- 1.8 The development potential of the Site in terms of land use, layout, public realm and height, bulk and massing has been thoroughly considered.
- 1.9 The scheme would make a significant contribution towards London’s affordable housing and student housing needs. The proximity to the Roundhouse, a live music venue makes student housing a good fit. As reflected in Agent of Change principles, it is often the case that noise and disturbance generated by live music venues can be challenging in terms of traditional residential accommodation, which tends not to be the case for more transient, younger residents of student accommodation developments. Notwithstanding the fact that the acoustic studies show that the Roundhouse is not a particularly noisy neighbour, the residential building has been located specifically at the eastern edge of the site, with the PBSA sitting alongside the Roundhouse. The uses therefore sit comfortably alongside each other in response to ‘Agent of Change’ principles.
- 1.10 A comprehensive townscape analysis, undertaken by Turley, has informed the massing and design of the Proposed Development to ensure that it relates to its surroundings and respects the adjacent Roundhouse and other nearby heritage assets including the Regents Canal Conservation Area whilst creating a new high-quality development in this prominent, sustainable, central London location.
- 1.11 A high standard of environmental design has been incorporated in terms of carbon savings, urban greening and biodiversity net gain, whole life carbon, and circular economy principles. The scheme would be car-free and provide ample cycle storage and achieve BREEAM ‘Excellent’, delivering a truly sustainable scheme in line with planning policy.
- 1.12 In heritage terms, the proposed Development would ensure that the significance of the surrounding designated heritage assets would be preserved. It is acknowledged that the Proposed Development results in elements of limited and less than substantial harm to the

setting of the adjacent Grade II\* Listed Roundhouse but in accordance with Paragraph 196 of the NPPF, the less than substantial harm would be outweighed by the public benefits of the proposal.

1.13 There are a number of substantial public benefits arising from the scheme which are listed throughout this Planning Statement and in the closing chapter and summarised as follows:

- Regeneration of a vacant, underutilised site in a sustainable town centre location;
- High quality development that respects the setting of the Roundhouse;
- Opening up of site with accessible public realm for local residents, workers and visitors;
- Contributing to provision of student housing, the demand for which is currently unmet;
- Provision of much needed affordable homes, including social rented family homes;
- Ground floor commercial uses providing activation of street and passive surveillance of the adjacent proposed Youth Space;
- Employment opportunities in construction (210 jobs) and operational stage (80);
- Estimated local spending by students of over £3m per year on goods and services;
- Car free scheme with generous provision of cycling facilities;
- Energy efficient, low carbon building, with urban greening and biodiversity improvements over existing.

1.14 This Town Planning Statement concludes that the Proposed Development accords with the key themes of the national planning policy objectives and guidance, strategic and local policy objectives, statutory tests and specific planning policy criteria. The Proposed Development complies with the Statutory Development Plan, and therefore planning permission should be granted, without delay. In any event the other, strong, material considerations discussed within this Statement also indicate that planning permission should be granted.

## 2 Introduction

- 2.1 This Town Planning Statement ('Statement') has been prepared by Gerald Eve LLP on behalf of Regal Chalk Farm Road Limited (herein referred to as 'the Applicant'). It supports an application for full planning permission to redevelop 100 and 100a Chalk Farm Road (herein referred to as 'the Site').
- 2.2 This Town Planning Statement assesses the Proposed Development in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 and the statutory duties found in Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 2.3 It provides a comprehensive review of relevant national, regional and local planning policy in relation to the Proposed Development. It sets out the planning justification for the Proposed Development and contains a detailed assessment in relation to relevant Development Plan policies and other material planning considerations and the statutory duties in respect of the historic environment.
- 2.4 The Application is assessed in relation to planning policy, guidance and the statutory tests with which, for the reasons set out within this Statement, it complies when considered as a whole, whilst also delivering significant public benefits.

### Development Description

- 2.5 The Proposed Development, designed by DSDHA Architects with the public realm designed by BBUK, is described in more detail in Section 6 of this Statement. In summary, full planning permission is sought for the following:

***“Demolition of existing buildings and redevelopment of the site to provide two buildings containing purpose-built student accommodation with associated amenity and ancillary space (Sui Generis), affordable residential homes (Class C3), ground floor commercial space (Class E) together with public realm, access, servicing, and other associated works.”***

- 2.6 An associated application for listed building consent relating to minor remedial works to the external fabric of the adjacent listed Roundhouse is submitted for the following:

***“Removal of existing steel beams in party wall with adjoining Roundhouse and works of repair and making good to brickwork.”***

### **The Applicant**

- 2.7 The Applicant, Regal Chalk Farm Limited, represents Regal London, one of the capital’s leading privately owned mixed-use developers with a focus on unlocking value from complex urban settings to transform London’s landscape. Regal London has delivered successful developments across London over the last 25 years, from Brent to Tower Hamlets, Barnet to Lambeth. Its developments are characterised by bespoke design and exceptional quality and are built to unlock value, enhance the local environment, and respect and engage local communities.
- 2.8 Unlike many other developers, Regal London is a fully integrated business operating across all stages of the development process from land acquisition and the planning and design stages through to physical project completion. This also means that as both the developer and contractor, Regal London has delivered every project for which it has secured planning permission for over its 25 year plus history.
- 2.9 Regal London is committed to playing its part in tackling the climate crisis, and to delivering better outcomes for the environment and its local communities through creating positive social value. Regal London's sustainability strategy focusses on four areas: transitioning to net zero carbon; investing in innovation; going beyond biodiversity net gain and helping disadvantaged groups into employment in real estate and construction through the Regal London Real Estate Academies.

## **Consultation**

- 2.10 The planning application is being brought forward following approximately 18 months of detailed pre-application discussions with Camden Council (LBC), the Greater London Authority ('GLA'), Transport for London ('TfL'), and Camden's Design Review Panel.
- 2.11 In addition to this, a comprehensive programme of engagement with the local community has taken place as set out in this Town Planning Statement (Section 6), the Design and Access Statement ('DAS') and the Statement of Community Involvement ('SCI') submitted with this Application. The Applicant is committed to continuing its engagement with local residents and businesses and stakeholders during the determination period and the construction and operational phases.

## **Application Documentation**

- 2.12 The proposals have considered a range of planning, design and environmental matters. These include, but are not limited to: design and townscape, landscape and public realm, traffic and transport, energy and sustainability, daylight/sunlight/overshadowing, noise and vibration, air quality, microclimate, flood risk and ecology. The application is supported by a number of technical studies and assessments. These documents combined assess different material considerations and consider the acceptability of the proposals and requirement for any mitigation, against the relevant planning policy context.
- 2.13 This Town Planning Statement should be read in conjunction with the accompanying plans and drawings submitted, as well as the following documents which are also submitted in support of this Application:
- Completed Planning Application Form, prepared by Gerald Eve LLP;
  - Community Infrastructure Levy (CIL) Additional Information Form, prepared by Gerald Eve LLP;
  - Covering Letter prepared by Gerald Eve LLP;
  - Area Schedule, prepared by DSDHA;
  - Aboricultural Impact Assessment, prepared by TMA;
  - Affordable Housing Statement, prepared by Gerald Eve LLP



- Air Quality Assessment, prepared by AQ Consulting;
- Archaeology Assessment, prepared by MOLA;
- Basement Impact Assessment, prepared by Pell Frischmann;
- Biodiversity Impact Assessment (and Ecological Impact Assessment), prepared by Ecology by Design;
- Construction Management Plan, prepared by Regal London;
- Circular Economy Statement, prepared by Whitecode;
- Daylight and Sunlight Report, prepared by Consil;
- Design and Access Statement, prepared by DSDHA;
- Delivery and Servicing Plan, prepared by Icen;
- Draft Heads of Terms, prepared by Gerald Eve (within this document);
- Drawing Schedule, prepared by DSDHA;
- Existing and Proposed Drawings, prepared by DSDHA;
- Energy Statement, prepared by Whitecode;
- Fire Strategy and Gateway 1 Form, prepared by Ashton Fire;
- Flood Risk Assessment, prepared by Pell Frischmann;
- Health Impact Assessment, prepared by Volterra;
- Heritage, Townscape, Visual Statement (HTVS), prepared by Turley;
- Land Contamination Desk Study, prepared by Pell Frischmann;
- Landscaping Statement, prepared by BBUK (within DAS);
- Noise and Vibration Report, prepared by Sandy Brown;
- Retention and Retrofit Report, prepared by DSDHA
- Regeneration Statement, prepared by Volterra;
- Solar Glare Report, prepared by Consil;
- Statement of Community Involvement, prepared by Meeting Place;
- Structural Heritage Engineer Report, prepared by Pell Frischmann;
- Structural Engineering Report, prepared by Pell Frischmann;
- Student Housing Management Plan, prepared by CRM;
- Sustainable Drainage Report, prepared by Pell Frischmann;
- Sustainability Statement, prepared by Whitecode;
- Travel Plan, prepared by Icen;
- Transport Assessment, prepared by Icen;
- Wind Microclimate Assessment, prepared by GIA;

- Whole Life Carbon Assessment, prepared by Whitecode.
- 2.14 A request for an Environmental Impact Assessment Screening Opinion in accordance with Regulation 6 (1) of the Town and Country Planning (Environmental Impact Assessment) Regulations (2017) was made to Camden Council on 21 December 2023 (ref. 2024/0029/P). The screening opinion of Camden Council as the local planning authority is that an Environmental Impact Assessment is not required. The documents above have all been agreed with Camden Council in terms of scope.
- 2.15 The Proposed Development is referable to the Mayor of London under Category 1C of the Town and Country Planning (Mayor of London) (Amendment) Order 2011 as a development which comprises building(s) more than 30 metres high outside of the City of London.
- 2.16 This Town Planning Statement sets out a planning assessment of the Proposed Development against development plan policies and other material considerations, based upon the conclusions of the technical studies that form part of the application.
- 2.17 The Statement is structured as follows:
- Section 3 – Site and Surroundings;
  - Section 4 – Planning History;
  - Section 5 – Proposed Development;
  - Section 6 – Consultation and Community Engagement;
  - Section 7 – Planning Policy Context;
  - Section 8 to 15 – Planning Policy Assessments;
  - Section 16 – Planning Obligations and Community Infrastructure Levy;
  - Section 17 – Summary and Conclusions.

### 3 Site and Surrounding Context

- 3.1 This section of the Statement describes the Site, its location, character and land uses in the context of the surrounding area. The full extent of the Site is shown within the red line boundary of the Site Plan, submitted with this application.
- 3.2 The Site is 0.28 ha and contains three 1970s commercial buildings - the tallest element comprising a six storey (approx. 20 metres AOD) office building fronting Chalk Farm Road with a two-storey link building adjoining and a three-storey building at the rear (with the lower storey mostly underground). There is also associated surface level and undercroft car parking at the rear with vehicle turning space. There is a vehicle crossover at the eastern edge of the site providing access via a set of vehicle gates. The Site's topography slopes steeply up from Chalk Farm Road to the railway boundary with a change in level of approximately 4.5 metres.
- 3.3 The Site has been vacated by its former owner and occupant (One Housing Group) and is currently in temporary meanwhile use. The front office building has a distinctive blue cladding and is dominant in views of the Roundhouse up and down Chalk Farm Road. The building has a poor relationship with the street with a large imposing wall on the back edge of the footway with no step free level access at street level and convoluted entrances to the buildings. In considering a previous redevelopment proposal, the existing building was considered by the Council and Historic England to have a negative impact on the setting of the Roundhouse and its removal was welcomed at the time.
- 3.4 The Site is on the south side of Chalk Farm Road. To the west, the Site is bound by the Roundhouse, which is a Grade II\* listed entertainment venue. To the east, the site is bounded by a former petrol filling station which has been demolished. The land is being redeveloped to provide a six-storey commercial building under a wider development known as the Camden Goods Yard development. As part of this development, a youth space is being provided and this is located immediately adjacent to the Site boundary.
- 3.5 To the rear, the Site is bounded by a surface level railway line (mainline rail to Euston). Beyond that is the Juniper Crescent Housing Estate, which is the subject of redevelopment proposals by One Housing following a resident ballot. Whilst still in design stages, it will see

a significant uplift in homes with building heights of up to 45 metres being referenced in the consultation documentation.

- 3.6 The Site is in a highly accessible location for travel by sustainable transport modes. It has a Public Transport Accessibility Level of 6a (on a scale of 0 – 6b with 6b representing the highest level of connectivity to public transport). The Site is within short walking distance of both Chalk Farm and Camden Town Underground stations (0.16 km and 0.8km, respectively). Also located to the front of the Site is the Roundhouse bus stop which provides routes to South, North, East and West London.
- 3.7 The surrounding area is mixed use in character with Chalk Farm Road having a strong commercial character at ground floor level and residential above. Opposite the site are buildings that vary in height from 1 to 4 storeys. To the north of Chalk Farm Road, in Belmont and Ferdinand Streets, are some taller residential buildings of between 8 to 12 storeys. The Roundhouse itself has been subject to recent expansion fronting Regent's Park Road, and there have been other recent approvals around Chalk Farm Station.

### **Site Designations**

- 3.8 The Local Plan Policies map identifies the Site as being subject to the following planning policy designations:
- Camden Town Centre;
  - Regent's Canal Conservation Area; and
  - Tier 2 Archaeological Priority Area.
- 3.9 Additionally, the Site is within the Camden Goods Yard area which is the subject of a Planning Framework Supplementary Planning Document (2017). The framework envisages the comprehensive redevelopment of the Site alongside the wider Camden Goods Yard development and Juniper Crescent Housing Estate.
- 3.10 In terms of emerging policy context, the Regulation 18 Draft New Camden Local Plan (January 2024), identifies the site as being 'Proposed Site Allocation C9'. The Draft New Camden Local Plan includes the draft site allocations previously consulted on as part of the draft Site

Allocations Local Plan (2020). In this document, the Site was identified as 'Site Allocation CGY4'.

- 3.11 The Site is situated within the Regent's Canal Conservation Area. In the Regent's Canal Conservation Area Appraisal and Management Strategy (2008), the buildings within the site are not identified as positively contributing to the conservation area.
- 3.12 The Site is not included in the statutory list of buildings of special architectural or historic interest. Further, on 22nd December 2023 a Certificate of Immunity from Listing was issued under the Planning (Listed Buildings and Conservation Areas) Act 1990, as amended, confirming that the Secretary of State, on the advice of Historic England, will not add the buildings on site to the statutory list.
- 3.13 A very small part of the eastern corner of the Site is within the London View Management Framework ('LVMF') protected vista from Parliament Hill (Protected Vista 2A.2 (from: Parliament Hill: the summit - looking toward the Palace of Westminster, Height of viewing plane: 84.46m AOD)).
- 3.14 There are a number of heritage assets in close proximity to the Site, including the Grade II\* listed Roundhouse. There is a Grade II listed horse trough outside the site on Chalk Farm Road. Chalk Farm Round Underground Station to the east is Grade II listed. Further to the east along Chalk Farm Road is the Grade II\* listed Horse Hospital and the Grade II listed Stanley Sidings and Stables.

## 4 Planning History

- 4.1 This section of the Statement provides an overview of the recent planning history associated with the Site and neighbouring area.

### The Site

- 4.2 An examination of LBC's online Planning Register has been carried out to identify planning permissions which are of relevance to the history of the Site. Relevant planning history is detailed below.

- 4.3 On 25<sup>th</sup> November 2019, planning permission (ref.2019/5407/P) was granted on a temporary basis for:

**"Temporary change of use from office (B1a) to a 25-bed cold weather shelter (Sui Generis) for EEA national rough sleepers until 31 March 2020"**

- 4.4 On 27<sup>th</sup> March 2015, planning permission (ref.2013/5403/P) was granted for:

**"Redevelopment of site to create a mixed-use development comprising 57 market flats (13x1beds, 28x2beds and 16x3beds), 6 affordable flats (3x3 bed social rented, 3x1 bed intermediate), new office, retail and restaurant units with associated works to highways and landscaping; following demolition of existing buildings and car park".**

- 4.5 The planning permission was never implemented and subsequently lapsed.

- 4.6 In association with planning permission ref.2013/5403/P, listed building consent was granted on 27<sup>th</sup> March 2015 for:

**"Removal of existing steel beams in party wall with adjoining Roundhouse and works of repair and making good to brickwork."**

- 4.7 On 4<sup>th</sup> October 2013, Prior Approval (ref.2013/5105/P) was granted for:

**“Change of use of ground to fourth floors from office (Class B1) to residential (Class C3) to provide for 46 units, comprising of 41x1 bedroom units and 5x2 bedroom units” (subject to s106 to secure car-capped development and a construction management plan).**

4.8 On 9<sup>th</sup> July 2012, planning permission (ref. 2011/0376/P) was granted for:

**“Change from office (Class B1) to restaurant (Class A3) following demolition of single storey building and replacement with two storey building”**

4.9 In association with planning permission ref.2011/0376/P, listed building consent (ref. 2011/0383/L) was granted on 10<sup>th</sup> July 2012 for:

**“Formation of single exit door through listed brick wall in association with the demolition of a single storey office accommodation and replacement with two storey restaurant.”**

#### **Neighbouring Sites**

4.10 The surrounding area is undergoing significant change and there has been a range of recent planning permissions approved at sites neighbouring 100 Chalk Farm Road. A summary of these is set out below.

4.11 At 155 and 157 Regent’s Park Road, planning permission (ref. 2021/0877/P) was granted on the 7<sup>th</sup> December 2021 for:

**“Demolition of existing building and redevelopment to provide a part 4 storey/part 7 storey building, with two basement levels, for a 59 bedroom hotel, with new street level public realm works in front (at junction of Regent's Park Road, Adelaide Road and Haverstock Hill).”**

4.12 At the Charlie Ratchford Centre on Belmont Street, planning permission (ref. 2020/5063/P) was granted on the 5<sup>th</sup> November 2021 for the following which is currently under construction:

**“Redevelopment of site including demolition of existing buildings and erection of a building up to 10 storeys in height to provide self-contained residential flats (Class C3) and associated works.”**

- 4.13 Planning permission (ref. 2020/1487/P) was granted on the 20<sup>th</sup> April 2020 at 4-6 Haverstock Hill and 45-47 Crogsland Road for the following, for which construction has recently been completed:

**“Demolition of existing buildings with retention of facade at 45-47 Crogsland Rd and construction of a part 4/part 5 storey building comprising flexible use of assembly + leisure (class D2) at basement and ground level with ancillary restaurant and bar (class A3/A4) at ground level or retail (class A1) at basement and ground floor level and 19 residential dwellings (on upper floors with associated cycle parking, amenity space and refuse and recycling storage] namely for addition of plant, reconfiguration of basement and ground floor layout to provide gym (Class D2), supermarket (Class A1) and restaurant (Class A3) and elevational alterations.”**

- 4.14 At 5-17 Haverstock Hill, planning permission (ref. 2016/3975/P) was granted on the 2<sup>nd</sup> October 2018 for the following, which has not yet been built:

**“Demolition of existing building and erection of a part-six, part-seven storey development comprising 77 residential units (8 x studio, 18 x 1-Bed, 32 x 2-Bed and 19 x 3-Bed units) (Use Class C3) and retail (Use Class A1-A5) use at ground floor with associated cycle parking, amenity space, refuse and recycling store and associated works.”**

- 4.15 Planning permission (ref. 2017/3847/P) was originally approved at the Camden Goods Yard site (the former Morrisons superstore and petrol filling station site) on the 15<sup>th</sup> June 2018 for:

**“Redevelopment of petrol filling station site to include the erection of a new building of up to six storeys and up to 11,243 sqm GEA floorspace to accommodate a petrol filling station (Sui Generis use), flexible retail/food and drink floorspace (Class A1, A3 uses), Class B1 floorspace and a winter garden; with cycle parking, public space, public toilets and other associated works and highway works; all following demolition of existing petrol filling station. Use of part ground/first floors as a foodstore (Class A1 use) with associated car parking for a temporary period of up to thirty months.**

**Redevelopment of the main supermarket to include the erection of seven buildings (Blocks A, B, C, D, E1, E2, F) of up to 14 storeys accommodating up to 573 homes (389 market and 184 affordable in up to 60,568 sqm GEA of residential floorspace) together**



**with up to 28,345 sqm GEA non-residential floorspace comprising foodstore (Class A1), flexible retail/food & drink (Class A1/A3), office and workshop (Class B1a and B1c), community centre (Class D2), roof level of 'Block B' for food and plant growing/production facility including small scale brewing and distilling (Sui Generis use); with associated ancillary office, storage, education, training, café and restaurant activities; together with new streets and squares; hard and soft landscaping and play space; lifts; public cycle parking and cycle hire facility and other associated works, including removal of existing surface level car parking and retaining walls, road junction alterations; all following demolition of foodstore."**

4.16 Planning permission ref. 2017/3847/P has been subject to a number of amendment applications including three minor material amendment applications as summarised below:

1. The first minor material amendment application (ref. 2020/0034/P) was granted on 5<sup>th</sup> May 2020 and related to the PFS site specifically. The amendments allowed for the insertion of a new development phase (Phase 1a) to allow for a single storey temporary food store to be constructed enabling the development of the main site (the former Morrisons store site) to come forward earlier.
2. The second minor material amendment application (ref. 2020/3116/P) was approved by LBC on 3<sup>rd</sup> December 2020. This application related to the main site only and secured minor amendments to Blocks A, B, C and F delivering 71 additional homes, alterations to floorplans, a reduction in supermarket car parking from 300 to 250 spaces, in addition to a number of other minor amendments. No changes were secured to the PFS site.
3. The third and most recent minor material amendment application (ref. 2022/3646/P) was approved by LBC on 29<sup>th</sup> March 2023. This application related to the PFS only (the Juniper Building). The application secured minor amendments through the removal of the petrol filling station and replacement with a publicly accessible Electric Vehicle Charging Station, extension of the Juniper Building westward and associated amendments to the ground floor and upper floorplans resulting from the removal of the PFS and extension of the building.

4.17 From discussions with the developer, St George, it is understood that they have commenced pre-application discussions with LBC regarding amending the proposals for the site.

4.18 Planning permission (ref. 2016/5760/P) was granted at the Roundhouse Theatre on Chalk Farm Road on the 16<sup>th</sup> August 2018 for the following, which has been built out:

**“The erection of a new building ranging from two to four storeys in height to accommodate new studios (Class D1) and offices (Class B1) within the service yard and the addition of a sixth storey to the existing 'container' office building for office accommodation (Class B1) together with installation of rail side storage containers and associated works within the service yard area.”**

## 5 Consultation

- 5.1 This section of the Statement summarises the pre-application and consultation process and how the Proposed Development has responded to comments received. It should be read alongside the Statement of Community Involvement ('SCI') submitted with the application, prepared by Meeting Place.
- 5.2 The Localism Act 2011 emphasises the need to involve and engage with the local community during the planning process.
- 5.3 Paragraph 39 of the National Planning Policy Framework (2023) emphasises that early engagement and good quality pre-application discussion enables better coordination between public and private resources and provides improved outcomes for the community.
- 5.4 Part A of Policy GG1 of the London Plan (2021) encourages early and inclusive engagement with stakeholders and local communities on the development of proposals.
- 5.5 At a local level, LBC adopted a Statement of Community Involvement ('SCI') in 2006 and this was last revised in 2011. The SCI sets out how LBC will involve local people, local businesses and other key organisations and stakeholders when they prepare planning policies and consider planning applications.
- 5.6 The SCI which forms part of this application demonstrates that a thorough and constructive consultation process has been undertaken in the preparation of the proposals which has culminated in the scheme submitted for planning. Feedback from the various consultees and stakeholders has been carefully considered by the project team and has fed into the design evolution of the Proposed Development ahead of the submission.

### **Engagement with Camden Council (LBC)**

- 5.7 The Proposed Development has been subject to extensive discussions over a period of 18 months through a bespoke Planning Performance Agreement with agreed with Officers. Pre-application meetings have been held with Officers in respect of a range of matters including

land use principles, design, heritage, public realm and servicing. These were topic based and involved various LBC officers.

- 5.8 The scheme has evolved and been amended following a series of design-based workshops led by the architect team, details of which are set out in the Design and Access Statement. This has included reduction and rearrangement of massing, and the architectural approach.

#### **Design Review Panel**

- 5.9 The design team presented the scheme at two of LBC's Design Review Panels - in August 2023 and January 2024. Comments were raised for the architectural, sustainability and landscaping teams to investigate further. Comments related to scale, mass, detailed façade design, public realm and embodied carbon.
- 5.10 The first DRP took place on the 25<sup>th</sup> August 2023 and feedback from the panel was broadly positive. The panel requested further information and visuals to support the proposed height and how it sits on the high street, as well as the location of the different entrances, daylight and layouts.
- 5.11 The second DRP took place on the 12<sup>th</sup> January 2024. Overall, the meeting was very positive, supporting the evolution of the scheme since the previous meeting including the rearrangement of massing. The Panel acknowledged that development of scale can be acceptable next to the listed Roundhouse as long as the architecture is of an exceptional quality. Advice was provided on the further refinement of the architecture and choice of materials for the facades.
- 5.12 The design team has sought to address these comments and further information on how this feedback has been addressed is contained within the Design and Access Statement.

#### **Development Management Forum**

- 5.13 The proposals were presented at the Development Management Forum run by LBC on 7 September 2023. Officers outlined the planning policy context for the Site and the Applicant presented the proposals. The presentation was followed by a detailed Q and A session. Key

questions were around land uses, public realm, density, number of homes / affordable housing and transport infrastructure.

### **Developer's Briefing**

- 5.14 The proposals were presented to Camden's Developer's Briefing on 30<sup>th</sup> January 2024. A total of three planning committee members attended (including one ward councillor) and four of the officers from LBC.
- 5.15 The comments were largely focussed on the relationship with and the management of the Youth Space albeit was acknowledged that this sits outside of the site. Notwithstanding Regal London confirmed that dialogue with the adjoining landowner would continue as it was in everyone's interest to ensure that the space works and is managed properly. Regal London confirmed that they will take joint responsibility on this.
- 5.16 Other comments related to security, anti-social behaviour, ground-floor uses, allocation of the affordable student beds, Roundhouse queue management and anticipated delivery.

### **Statutory Stakeholder Engagement**

#### Greater London Authority ('GLA')

- 5.17 In addition to the pre-application discussions with Camden, two pre applications meetings were held with the GLA in July 2023 (ref. 2023/0392/P2I) and January 2024 (ref. 2023/0835/P2F).
- 5.18 The first pre-application meeting was held on 4 July 2023 and sought advice on the land use principles, urban design and heritage, transport and energy/sustainability considerations. Officers at the GLA raised the following key points:
- A student accommodation-led mixed-use scheme, including conventional self-contained affordable housing with ground floor commercial would be supported in this highly accessible town centre location.
  - The affordable housing proposed is acceptable in principle but requires clarification of the tenure and affordability levels.

- The emerging architectural appearance is strongly supported and has the potential to respond positively to the existing and emerging townscape.
- Public realm and landscaping proposals along Chalk Farm Road are welcomed.
- The site's very close proximity to the Roundhouse will mean that the application will need to accord with the Agent of Change principles in the London Plan. It is likely that a relatively low level of less than substantial harm could be caused to the Grade II\* listed Roundhouse, which would need to be outweighed by public benefits.

5.19 The second GLA pre-application took place on 24<sup>th</sup> January 2024 to update Officers on the progress of the scheme including rearrangement of massing on the site and further design detail. The scheme continued to be very well received with positive comments offered in relation to the scale, massing, design and heritage impacts. GLA Officers confirmed that the blended approach to affordable housing was acceptable and would meet the fast-track approach.

#### Historic England ('HE')

5.20 A presentation was shared with officers at Historic England on the 7<sup>th</sup> September 2023. In summary, Historic England noted that some harm may arise from removal of the existing boundary wall and that the massing could also cause some harm. However, it was noted that a cluster rather than a single building would break up the bulk of the proposals and that the intended design qualities would help to mitigate any impact.

#### Transport for London ('TfL')

5.21 Transport for London were also in attendance at the GLA meeting and offered commentary in relation to the strategic transport impacts of the scheme in terms of prioritising pedestrians and cycling in particular. Transport related comments on the proposals were set out in the GLA response received on the 4<sup>th</sup> August 2023 which confirmed the required deliverables relating to transport considerations and it was agreed that ongoing contact with the relevant TfL Infrastructure Protection teams will occur noting the proximity of the Northern Line beneath the site.

- 5.22 TfL has advised separately that they are currently undertaking studies into providing potential step free access to Chalk Farm Station and a follow up meeting was held between the Applicant and TfL officers to discuss the details. In this case, given the Roundhouse crowd and fire safety measures in place, the site is not suitable for this access point and this has been conveyed to TfL.

#### Network Rail

- 5.23 The Applicant team has been in consultation with Network Rail in light of the fact that the site boundary adjoins Network Rail land. The developer will need to enter into an agreement to ensure that the construction of the development will not harm the safe operation of the railway during and after construction. A four-metre protection zone has been factored into the design proposals with no buildings being constructed in this area.

#### Health and Safety Executive ('HSE')

- 5.24 A pre-application request has been lodged with the HSE which has confirmed that it is only able to provide written feedback at this time. This feedback is awaited and will be reflected on and shared with Officers when it is received.

#### **Community Engagement**

- 5.25 A thorough approach has been taken to consult with local residents, community groups, local businesses and organisations. The consultation has aimed to fully explain the context for the proposals, present the designs for the Site and respond to comments and questions raised. The submitted Statement of Community Involvement ('SCI'). which accompanies the application fully details the consultation exercise and a summary is provided below.
- 5.26 Early meetings were sought with political and community representatives to provide an update and understand their initial feedback.
- 5.27 Over the course of the pre-application phase, Regal London met with a number of political stakeholders such as the Ward Councillors and Cabinet Member. Councillors accepted the

use of the site for student accommodation in principle and were keen to ensure a provision for genuinely affordable housing, including family units, would be provided on site.

#### The Roundhouse

- 5.28 There has been on-going engagement and collaboration with the Roundhouse as an immediate neighbour which has helped shape and form the design, particularly boundary conditions and the fact that the fire exit strategy for the Roundhouse utilises the Site. As such, there has been on going meetings about the details of the public realm and how it interfaces with the operation of the Roundhouse. The Applicant has also established a partnership with the Roundhouse Trust to support young creatives, including through integration with the Roundhouse employability programmes, mentoring, and working with the talent at the Roundhouse to develop vibrant new content. The Applicant is committed to partnership working through the planning, construction and occupation of the scheme.

#### Berkeley Group – Camden Goods Yard

- 5.29 Likewise, there has been on going engagement with Berkeley St George, the developer of Camden Goods Yard which includes the adjacent Petrol Filling Station (PFS) site - currently in use as a temporary store and which would include a Youth Space as part of its planning obligations for young person's play.
- 5.30 Mindful that the plans for the PFS are being amended, the Applicant and St George are working collaboratively to ensure their proposals are compatible. This is particularly important given the proposed Youth Space has two frontages to the Site boundary. The Applicant is keen ensure that the Youth Space and the Proposed Development present as a unified civic space and are looking forward to working with St George in terms of its custodianship. The Applicant has become a member of the Camden Goods Yard Construction Working Group and are also eager to engage in any future Community Working Group meetings as part of the Youth Space delivery strategy (which is a Section 106 obligation of the Camden Goods Yard planning permission).



### Other Local Engagement

- 5.31 The Applicant has met with community organisations and local businesses, such as Castlehaven Community Association, Luminary Bakery and Camden Town Unlimited to share information about their proposals.
- 5.32 A community newsletter was distributed to neighbouring residents and businesses which provided information on the project team, details of the site and its history, and invited people to the initial consultation event within the existing building. The newsletter promoted the dedicated project website, which went live following the consultation launch events. Freephone, email and freepost details were included for people to contact the team.
- 5.33 A project website was launched to act as an online hub of information on the proposals and channels for feedback. The website hosted a survey, which allowed visitors to outline their views about the area and any improvements they are seeking. The survey was taken by 12 people and the results were analysed by the team. Of the 12 people who took the survey, just one came back as “mostly negative” with the remaining either neutral, and mostly positive. Key elements of how to improve the area as outlined by respondents included additional green space and a wider street scene.
- 5.34 The initial community engagement events were hosted on the 26<sup>th</sup> and 29<sup>th</sup> April 2023 within the building at 100 Chalk Farm Road. These events were held at times that would ensure that those who work both sociable and unsociable hours could attend and have their opportunity to feedback on the proposals. The design team interacted with 81 people across the two days. 10 feedback forms were returned and analysed to identify key themes and help the evolution of the scheme. The key points raised as part of the feedback were improved lighting on Chalk Farm Road, better public realm on Chalk Farm Road, well maintained pavements and ensuring design is sympathetic to the neighbouring Grade II\* listed Roundhouse.
- 5.35 A second round of events were hosted on the 13<sup>th</sup> and 16<sup>th</sup> September 2023 where 27 people attended. The feedback forms identified that student accommodation is accepted as a good use of the Site, a new building to replace the old one would be good for the area and

improvements to the public realm were welcomed. There were some queries relating to the building heights which have since been addressed.

- 5.36 The Primrose Hill Conservation Area Advisory Committee (CAAC) provided comments on the proposals on the 27<sup>th</sup> September 2023 following the DM Forum. The comments were specifically focused on the impact on the setting of the Roundhouse and the loss of the boundary wall to the site, which the team digested. A response was prepared and issued to the CAAC to address the comments raised, and the Applicant welcomed the opportunity to speak directly to the key stakeholders.
- 5.37 The Applicant intends to continue to communicate regularly and openly with all stakeholders throughout the planning process and, should planning permission be granted, subsequently during the construction and operational phases.

### **Summary**

- 5.38 The Statement of Community Involvement (SCI) prepared by Meeting Place, which sits alongside this Planning Statement, demonstrates that a thorough and constructive consultation process has been undertaken in the preparation of the proposals which has shaped the scheme submitted for planning, in accordance with established planning practice and standards. The scheme proposals have evolved and been revised through the consultation process with statutory and local stakeholders.
- 5.39 Overall, through an iterative process of consultation and engagement the proposals have been reviewed and refined in response to stakeholder feedback received, as detailed above, in the SCI and the DAS. Notwithstanding this, the Applicant intends to continue its discussions and engagement with all stakeholders following the submission of the Planning Application and should planning permission be granted, subsequently during the construction and operational phases. This is also whilst recognising that stakeholders should also take the opportunity to formally comment on the proposals as part of the statutory consultation process undertaken by LBC officers.

## 6 Proposed Development

6.1 The details of the Proposed Development are summarised in this section of the Statement. This section should be read in conjunction with the Design and Access Statement and application drawings prepared by DSDHA, and the suite of technical documents submitted with the application.

6.2 Full planning permission is sought for:

***“Demolition of existing buildings and redevelopment of the site to provide two buildings containing purpose-built student accommodation with associated amenity and ancillary space (Sui Generis), affordable residential homes (Class C3), ground floor commercial space (Class E) together with public realm, access, servicing, and other associated works.”***

6.3 An associated application for listed building consent relating to minor remedial works to the external fabric of the adjacent listed Roundhouse is submitted for the following:

***“Removal of existing steel beams in party wall with adjoining Roundhouse and works of repair and making good to brickwork.”***

6.4 The Proposed Development encompasses several elements which are summarised as follows:

- Erection of a collection of rounded/cylindrical drums, connected at ground/podium to house 265 student accommodation units and associated amenity;
- A separate adjacent building providing 24 affordable homes;
- Commercial floor space totalling 824sqm (GIA).
- Removal of the existing boundary wall on Chalk Farm Road to improve access to the site.
- A new tiered public space adjacent to the Roundhouse with an integrated ramp.
- A series of new public spaces and large communal garden for residents at podium level, with sustainable urban drainage, rain gardens and permeable paving.
- Provision for ample long-stay and short-stay cycle parking spaces.

## Land Uses

6.5 The existing and proposed floorspace is set out by land use in the table below.

Land Use	Existing sqm (GIA)	Proposed sqm (GIA)	Net Change sqm (GIA)
Commercial (Use Class E)	3,433sqm	824sqm	-2,650sqm
Purpose Built Student Accommodation (Sui Generis)	0sqm	9,474sqm	+9,474sqm
Affordable Residential (Use Class C3)	0sqm	2,765sqm	+2,765sqm
<b>Total</b>	3,433sqm	13,063sqm	+ 9,630 sqm

*Table 1: Existing and proposed floorspace*

### Student Accommodation (Sui Generis)

6.6 The Proposed Development includes the provision of 265 student bedrooms alongside ancillary student amenity space.

6.7 There are four main room types: cluster beds, studio beds, premium studio beds and premium studio wheelchair accessible beds. The rooms are designed to meet the modern requirements of students and satisfy demand for PBSA, enhancing and broadening the quality of accommodation available within the market.

6.8 A breakdown of the proposed student accommodation by room type is set out in the table below.

Student Bed Type	Number of Units
<b>Cluster Beds</b>	42
<b>Studio Beds</b>	155
<b>Premium Studio Beds (inc 10% WCA)</b>	68
<b>Total</b>	265

6.9

*Table 2: PBSA mix*

- 6.10 Students will have access to a large entrance lobby at ground floor with dining room and workspaces set around a courtyard garden. There is a gym and rooftop amenity space, as well as cycle storage provision. At least 10% of the PBSA rooms would be wheelchair accessible.

#### Residential Use (Use Class C3)

- 6.11 The Proposed Development includes the provision of 24 residential homes (Use Class C3). All residential homes have been designed to be generous in size and exceed the nationally prescribed space standards and those set out within the London Plan and Mayor's housing design standards.
- 6.12 The proposed affordable residential split is set out in the table below:

Unit Size	Number of Homes by Unit size	Percentage of homes by unit size	Wheelchair homes
<b>1B 2P</b>	6	25%	0
<b>2B 4P</b>	12	50%	1
<b>3B 5P</b>	6	25%	2
<b>Total</b>	24	100%	3

*Table 3: Affordable housing mix*

- 6.13 The proposed homes are a range of sizes and types, varying from one-bedroom homes, suitable for two people, two-bed homes and three bed homes suitable for five people.
- 6.14 All of 24 homes are proposed to be affordable homes. Of the 24 affordable homes provided, 13 are proposed to be Social Rent and the remaining 11 homes would comprise Intermediate Rent.
- 6.15 There would be cycle parking and lobby space at ground floor level of the building.

### Commercial Floorspace (Class E)

- 6.16 The ground floor will be activated through proposed commercial floorspace comprising of 824 sqm of Class E floorspace that would cater for employment and commercial uses. This will be facing Chalk Farm Road and the Youth Space and signalled by large, glazed openings and windows.

### **Design and Massing**

- 6.17 The proposal is conceived as a collection of rounded/cylindrical forms, three of which are connected (Building 1) and house the student accommodation, and one independent building (Building 2), which provides affordable housing.
- 6.18 The three cylindrical drums for Building 1 comprise the following heights:
- North Drum: 6 storeys + [50.480] m AOD
  - East Drum: 9 storeys + [ 59.480] m AOD
  - West Drum: 12 storeys + [68.480] m AOD
- 6.19 The residential building (Building 2) is a rectilinear building of 10 storeys / + [ 62.580 ] m AOD.
- 6.20 The materials comprise brick base with terracotta cladding and aluminium fins to Building 1. Building 2 also features a brick base, terracotta cladding with metal balustrades and aluminium louvres.

### **Public Realm and Landscaping**

- 6.21 An extensive package of public realm improvements is proposed as part of the Proposed Development, designed by BBUK. The external amenity space provision can be broken down as follows:
- Public realm: 336 sqm;
  - Courtyard amenity: 62 sqm;
  - Podium amenity: 642 sqm;
  - Level 6 roof terrace: 198 sqm.

- 6.22 At ground floor level, it is proposed to improve and increase the public realm to Chalk Farm Road, incorporating cast stone stepped seating to the north-west of the Site next to the Roundhouse. The design proposes to re-use bricks from the existing 'Camden Wall', if feasible in the bleacher seating either as solid bricks mixed with the proposed bricks of the ground floor facade or crushed and used as aggregate in terrazzo slabs.
- 6.23 A shared outdoor space for residents and students is proposed at the central area of the podium level. Trees would be under-planted with a mixture of lower growing shrubs, perennials, grasses and bulbs. A play area will also be in the centre of the podium garden with fixed play equipment set on rubber crumb type safety surface. The podium extends up to the boundary wall to the south separating the development from the Network Rail assets. A 3m obstacle-free easement strip has been provided as required for maintenance by Network Rail.
- 6.24 It is proposed to introduce two new trees at the entrance to the student housing, as well as new stone paving. This is also proposed at the forecourt of the affordable residential entrance.
- 6.25 A student amenity roof terrace is proposed at Level 6, designed with planting and seating. The upper roofs are inaccessible apart from for maintenance purposes. The remaining area is designed to be covered with biodiverse planting. Wire supported climbing plants are proposed around the plant enclosure of Level 9.

### **Energy and Sustainability**

- 6.26 Sustainability is a key aspect of the Proposed Development, not only in terms of BREEAM and life-time carbon reduction but in its operational phase in terms of health and wellbeing. The Proposed Development is highly sustainable. The Energy Strategy proposes an all-electric solution, without gas or other fossil fuels supplied to the Site to minimise greenhouse gas emissions.
- 6.27 Passive design measures include glazing to control overheating, pipework insulation with high thermal properties. Active design measures include a communal heating system using air source heat pumps, installation of MVHR with heat recovery, and energy efficient lighting.

There would be provision in the plant room for connection to any future DHN and heat pumps and PV panels at roof level are proposed to serve both student and residential accommodation. Overall, the measures result in a reduction in carbon emissions by 36% over Part L, with Net Zero achieved via a financial contribution to an offset fund.

### **Servicing, Access and Parking**

- 6.28 Separate pedestrian entrance points are provided for each of the respective uses, all of which will be taken from Chalk Farm Road which will benefit from a widened footway with the proposed building lines set back when compared to existing. The proposals also include dedicated public realm / landscaped areas along the site frontage as noted above.
- 6.29 At podium level, a clear route through the garden maintains the existing fire escape from the Roundhouse. There are two exits, one from the existing Roundhouse stair, the other from the new podium stair. These stairs are used for emergency exit only.
- 6.30 The Proposed Development would be car free. It seeks to provide 274 long stay cycle spaces and 30 short stay spaces. The cycle parking is proposed to be split across different locations for the different uses, with a dedicated cycle store provided at the ground floor level of the affordable housing block and a further cycle store at ground floor level of the student accommodation block. Both have separate entrance points.
- 6.31 Given the Development will be car-free, vehicle access to the Site is limited to emergency vehicles only. The existing dropped kerb will be retained to allow a fire tender vehicle to enter the Site in forward gear, drive to the required point, and then reverse back out onto Chalk Farm Road when departing.
- 6.32 It is proposed to utilise the existing on-street bay present on Chalk Farm Road directly fronting the Site to service the Proposed Development. Given the length of this bay, there is sufficient space within this bay to accommodate multiple deliveries at once and allow for refuse collection on collection days.



### **Works to listed building**

- 6.33 The application includes an associated listed building consent application. This stems from the need to remove the attached existing building, which is crudely and partly supported off the Roundhouse, and to take the opportunity to make good the fabric. New connections to the listed building will be formed in a less intrusive manner – both existing and proposed methods of connection and structural support are detailed on the accompanying structural drawings and report prepared by Pell Frischmann
- 6.34 The Grade II listed Cattle Drinking trough is located outside of the Site, on public land directly adjacent to the highway. The intention is to relocate it from its present location to remove the risk of vehicle impact from its present location (and the reason for it being identified as ‘at risk’ on the Heritage at Risk Register maintained by Historic England). This does not form part of the current application and intent will be to pursue these works as part of wider and associated proposals for highway improvement works (including the necessary application for listed building consent).

### **Phasing**

- 6.35 The Proposed Development will be delivered in two phases: - Phase 0: Demolition, preparatory and enabling works to include piling and basement excavation; and - Phase 1: Construction of the Proposed Development and associated public realm and landscaping works.
- 6.36 It is intended that a phasing condition would be included on the planning permission, such that planning conditions may be discharged in a proportionate manner relating to these phases of works.
- 6.37 It also intended that the Proposed Development is a phased development for the purposes of the Community Infrastructure Levy regulations 2010. This means that CIL payments would be linked to the commencement of phases of the Proposed Development and payable in accordance with Camden's instalments policy thereafter.

## 7 Planning Policy Context

- 7.1 This section of the Statement outlines the relevant national, regional and local planning policy and guidance documents against which the Proposed Development should be assessed against.
- 7.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Statutory Development Plan unless material considerations indicate otherwise.
- 7.3 The Statutory Development Plan for the purposes of this application comprises:
- The London Plan (2021);
  - The Camden Local Plan (2017); and
  - The Camden Site Allocations Plan (2013)
- 7.4 Both the London Plan and LBC's Development Plan are supported by various adopted Supplementary Planning Guidance documents which are also material considerations.
- 7.5 In addition, decisions must accord with relevant legislation. Section 66 of the 1990 Planning (Listed Buildings and Conservation Areas) Act 1990 provides that decision makers are required to have "special regard" to the desirability of preserving listed buildings and their settings.
- 7.6 Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out that local planning authorities should pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas when considering applications.

### **National Guidance – National Planning Policy Framework (2023)**

- 7.7 The National Planning Policy Framework ('NPPF') sets out the Government's economic, environment and social planning policies for England and supersedes the vast majority of Planning Policy Guidance Notes (PPGs) and Planning Policy Statements (PPSs). It summarises in a single document all previous national planning policy advice. Taken together, these

policies articulate the Government's vision of sustainable development, which should be interpreted and applied locally to meet local aspirations.

- 7.8 The Ministry of Housing, Communities and Local Government published the revised NPPF in December 2023. This follows the revised NPPF in July 2021 and the 2019 revision of the NPPF originally published in 2012.
  
- 7.9 The presumption in favour of sustainable development is intended to ensure that the planning system focuses on opportunities for positive growth, making economic, environmental and social progress for current and future generations. The presumption, in practice, means that significant weight should be placed on the need to support economic growth through the planning system and local planning authorities should plan positively for new development and approve all individual proposals wherever possible. However, development should not be allowed if it would undermine the key principles for sustainability in the NPPF. The NPPF makes clear that the policies should apply "unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits" (paragraph 11(b)).
  
- 7.10 Paragraph 8, Chapter 2 of the NPPF sets out how the planning system can contribute to achieving sustainable development. One of the three overarching objectives is based around economic enhancements 'to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity'.
  
- 7.11 The Government's strategic objective as set out in the NPPF is to deliver a wide choice of high-quality homes and create sustainable, inclusive and mixed communities. Chapter 5 of the NPPF supports the Government's objective of significantly boosting the supply of homes. Local planning authorities should plan for a mix of housing based on current and future demographic trends. They should also identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand.
  
- 7.12 Chapter 11 of the NPPF relates to making efficient use of land and advises that planning policies and decisions should promote an effective use of land in meeting the need for homes

and other uses while safeguarding the environment and ensuring safe and healthy living conditions.

- 7.13 Section 16 of the NPPF states that the Government attaches great importance to the design of the built environment and that good design is a key aspect of sustainable development. In terms of listed buildings, Paragraph 200 states that any harm to, or loss of, the significance of a designated heritage assets should require clear and convincing justification. Paragraph 201 states that where a development proposal would lead to less than substantial harm to the significance of a heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

#### **National Guidance – Planning Practice Guidance (as updated to 2023)**

- 7.14 In March 2014, the Government launched the web-based Planning Practice Guidance ('PPG'). This aims to provide guidance which is useable in an up-to-date and accessible manner.
- 7.15 The PPG outlines how government planning practice should be followed and interpreted in accordance with the principles of the NPPF. Regarding decision making, the guidelines set out in the PPG are a material consideration and accordingly should carry weight in the determination of planning applications.

#### **Regional Planning Policy – The London Plan (2021)**

- 7.16 The London Plan 2021 is the Spatial Development Strategy for Greater London. It sets out a framework for how London will develop over the next 20-25 years and the Mayor's vision for Good Growth. The London Plan forms the London-wide policy context within which the Boroughs set their local planning agendas, and forms part of the Statutory Development Plan.
- 7.17 The detailed objectives of the London Plan seek to ensure that London can meet the challenges of economic and population growth; be internationally competitive and successful, deliver diverse, strong, secure and accessible neighbourhoods; be world-leading in improving the environment; and be easy, safe and convenient for everyone to access, jobs, opportunities and facilities.

- 7.18 Policy GG1 of the London Plan introduces the concept of good growth and seeks to build on the City's tradition of openness, diversity and equality, to help deliver strong and inclusive communities. Policy GG2 seeks to enable the development of brownfield land and identifies the need to explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development.
- 7.19 Part A of London Plan Policy D3 (Optimising site capacity through the design-led approach) reiterates that all development must ensure the best use of land by following a design-led approach that optimises the best capacity of land by ensuring that development is of the most appropriate form and land use for the site.
- 7.20 Part B of London Plan Policy D1 (London's form, character and capacity for growth) sets out steps for using a particular area's characteristics to establish the capacity for growth of different areas and ensure that sites are developed to an optimum capacity that is responsive to the site's context and supporting infrastructure.
- 7.21 The Optimising Site Capacity: A Design-Led Approach LPG (2023) builds on Part B of London Plan Policy D1 and ensures placemaking is prioritised by capitalising on the insight and knowledge of local communities. This should involve meaningful and upfront engagement and collaboration with local communities, organisations and businesses, to ensure they have a greater say on the type of development in their local area at the plan-making stage.

#### **Local Planning Policy – The Camden Local Plan (2017)**

- 7.22 At the local level, LBC's Local Plan was adopted on 3 July 2017, replacing the Core Strategy and Development Policies documents. This, coupled with LBC's Site Allocations Plan (2013), forms the local tier of the Development Plan and is therefore central to planning decisions and the control of future developments in the Borough.
- 7.23 Policy G1 of the Local Plan states that the Council will focus Camden's growth in the most suitable locations and manage it to make sure that its opportunities and benefits are delivered and that it is sustainable. The Council will seek to promote the most efficient use of land and buildings by seeking development that makes full use of the site, taking into account the quality of design, its surroundings, sustainability, amenity, heritage, transport

accessibility and any other considerations relevant to the site. The Council will expect a provision of a mix of uses in suitable schemes, including an element of housing where possible.

### **Camden Goods Yard Planning Framework (2017)**

- 7.24 In July 2017 the Council adopted the Camden Goods Yard Planning Framework as a Supplementary Planning Document (CGYPF). The framework is designed to help guide future development in the area. It is an important consideration when assessing planning applications. The site is within the framework area, identified within the 'Chalk Farm Road' area where new development creates a significant opportunity to radically enhance this important part of Camden Town Centre and create an inviting gateway to existing and new neighbourhoods.
- 7.25 The area is identified as a mixed-use area – commercial focus, and the CGY Planning Framework sets out a number of objectives, including:
- Create an engaging high street frontage on Chalk Farm Road south side and the access road. This should include an active frontage with new commercial uses at ground floor.
  - Improve the environment for pedestrians and cyclists and improve the capacity and safety of the junction, which is likely to remain the main access point to the area.
  - Take the opportunity to enhance the setting of the Roundhouse.

### **Emerging Local Planning Policy Context**

- 7.26 LBC is currently preparing a new Local Plan and has recently commenced consultation on the Draft Local Plan (Regulation 18). The consultation period runs from 17 January to 13 March 2024. Following this, the Plan will be submitted to the government for public examination by a Planning Inspector and further comments invited. If the Plan is found sound it will be adopted by the Council for use in planning decisions, superseding the 2017 Camden Local Plan and 2013 Site Allocations Local Plan.

- 7.27 Prior to the Regulation 18, LBC consulted on its Draft Site Allocations Local Plan (SALP) between 13 February and 27 March 2020 with the site being identified within the 'Camden Goods Yard Area'. The area consists of several key development sites including Morrisons Supermarket, Juniper Crescent, Gilbey's Yard and sites along Chalk Farm Road in line with the Camden Goods Yard Planning Framework. The size of the area and the level of developer interest make it one of the few remaining opportunities in Camden to create an entirely new mixed-use neighbourhood.
- 7.28 The Site also formed a specific site allocation in the SALP (CGY4) which set out expectations for redevelopment, including a range of uses with better engagement between the site and Chalk Farm Road. The SALP site allocations have now been incorporated into the draft new Local Plan which is out for consultation.
- 7.29 In the Regulation 18 Draft Local Plan, the Site is the subject of an allocation, C9 100 Chalk Farm Road which confirms the Council's support for development to support a variety of uses including employment, homes, student accommodation, and restaurant/retail. Again, a key objective is to bring better engagement between the site and Chalk Farm Road with town centre uses opening on to the street. It explicitly sets out that student accommodation may be acceptable which is reflective of the engagement to date with the Applicant over their proposals.
- 7.30 At this early stage, in accordance with Paragraph 48 of the National Planning Policy Framework, the Regulation 18 Local Plan is afforded little weight in the determination of planning applications. As such, the planning policy assessment sections within this Planning Statement do not give particular consideration to the Regulation 18 Local Plan except insofar as it sets the direction of travel the Council is taking on relevant matters.
- 7.31 The NPPF sets out that decision-makers may give weight to relevant policies in an emerging Local Plan according to its stage of preparation, the extent to which there are unresolved objections to relevant policies, and their degree of consistency with policies in the NPPF. At the time of writing, the Regulation 18 draft Local Plan has very limited weight but is a material consideration, and the policies within will be applied increased weight as the plan preparation progresses.

7.32 Notwithstanding this, Camden's aspirations for the Site as set out in Policy C1 and Site Allocation C9 of the Regulation 18 Draft Local Plan have shaped the Proposed Development.

### **Other Material Considerations**

7.33 Supplementary Planning Guidance and Documents which are a material consideration in the determination of this application include the following:

- Mayor of London's Air Quality Neutral Guidance (2023)
- Mayor of London's 'Be Seen' Energy Monitoring Guidance (2021);
- Mayor of London's draft Energy Planning Guidance (updated 2020);
- Mayor of London's Accessible London SPG (2014);
- Mayor of London's Characterisation and Growth Strategy LPG (2023);
- Mayor of London's Optimising Site Capacity LPG (2023);
- Mayor of London's Housing Design Standards LPG (2023);
- Mayor of London's Housing SPG (2016);
- Mayor of London's Sustainable Transport, Walking and Cycling Guidance (2022);
- Mayor of London's Whole Life Carbon Guidance (2022);
- Mayor of London's Urban Greening Factor Guidance (2023);
- Regent's Canal Conservation Area Appraisal and Management Strategy (2008);
- Camden Planning Guidance – Design (2021);
- Camden Planning Guidance – Access for All (2019);
- Camden Planning Guidance – Employment Sites & Business Premises (2021);
- Camden Planning Guidance – Energy Efficiency and Adaptation (2021);
- Camden Planning Guidance – Town Centres and Retail (2021);
- Camden Planning Guidance – Amenity (2021);
- Camden Planning Guidance – Public Open Space (2021);
- Camden Planning Guidance – Air Quality (2021);
- Camden Planning Guidance – Transport (2021);
- Camden Planning Guidance – Trees (2019);
- Camden Planning Guidance – Student Housing (2019);
- Camden Planning Guidance – Developer Contributions (2019); and
- Camden Planning Guidance – Water and Flooding (2019).

7.34 In addition to the guidance set out above, several draft guidance documents to support the London Plan (2021) have been reviewed and taken into consideration:

- Fire Safety LPG;



- Student Housing LPG;
- Affordable Housing LPG.

### **Key Planning Considerations**

7.35 The Proposed Development has been assessed against the following principal planning matters:

1. Planning Principles (including demolition and land uses);
2. Housing – PBSA and Affordable Housing (including residential quality);
3. Design (including Tall Buildings);
4. Heritage and Townscape;
5. Landscaping and Public Realm;
6. Energy and Sustainability;
7. Transport and Servicing;
8. Other Environmental and Technical Considerations (including daylight / sunlight, noise, air quality, Agent of Change, basements, ecology, fire safety, archaeology, flood risk, wind, ground contamination and health impact).

7.36 In the following sections of the Planning Statement (8 to 15), each of the key planning considerations noted above is addressed, having regard to the Development Plan as a whole, and any wider material considerations.

## 8 Planning Principles

- 8.1 This section assesses the principle of the development of this site for a student housing led development. Specifically, it addresses the proposal to demolish the building (rather than retrofit), and the principle of loss of offices on this site. It then looks at the proposed land uses and the principle of student housing alongside conventional housing in the context of policy. Matters relating to housing and affordable housing are set out in the subsequent section.

### Principle of Demolition - Policy Context

- 8.2 There is a growing commitment to achieving Net Zero Carbon buildings by 2030, meaning many new developments need to consider now how far they can go in enabling the lowest carbon performance possible. Policy D3 of the London Plan sets out at paragraph 3.3.10 that *“To minimise the use of new materials, the following circular economy principles (see also Figure 3.2), should be taken into account at the start of the design process and, for referable applications or where a lower local threshold has been established, be set out in a Circular Economy Statement”*.
- 8.3 Paragraph 3.3.11 continues to set out that *“Large-scale developments in particular present opportunities for innovative building design that avoids waste, supports high recycling rates and helps London transition to a circular economy, where materials, products and assets are kept at their highest value for as long as possible.”*
- 8.4 The GLA’s Circular Economy Statement LPG (2022) Chapter 2.4 sets out design approach for existing buildings. This chapter sets out a decision tree, stating this should be followed to inform the design process from the outset. The Circular Economy design approaches for existing structures are as follows (as set out in Table 2 of this document and Figure 3.2 of London Plan Policy D3):
- Retain and retrofit
  - Partial retention and refurbishment
  - Disassemble and reuse; and

- Demolish and recycle

- 8.5 Paragraph 2.4.2 of the LPG states *that “retaining existing building structures totally or partially should be prioritised before considering substantial demolition, as this is typically the lowest carbon option.”* This goes on to state that *“Proposals that are further down the hierarchy will require more detailed and compelling justification.”* It notes that *“There may be other planning reasons that necessitate the demolition or retention of existing buildings, such as heritage considerations, which the process set out in Figure 4 [Decision tree for design approaches for existing structures/buildings] cannot and does not override.”*
- 8.6 Policy CC1 (Climate change mitigation) of the Local Plan requires all development to minimise the effects of climate change and encourages all development proposals to demonstrate the highest environmental standards feasible that are also financially viable during both construction and occupation. All development proposals that involve substantial demolition are required to demonstrate that it is not possible to retain and improve the existing building (Part E) and optimise resource efficiency (Part F).
- 8.7 Paragraph 9.5 and 9.6 of the Energy Efficiency CPG states that “taking into account the condition of the existing building and feasibility of re-use above, the following hierarchy should be used to explore all potential options of an existing site, with the aim of optimising resource efficiency.
- I. Refit
  - II. Refurbish
  - III. Substantial refurbishment and extension
  - IV. Reclaim and recycle”
- 8.8 All options are expected to achieve maximum possible reductions for carbon dioxide emissions and include adaptation measures, in accordance with the Council’s Development Plan and this CPG.

## Retrofit - Assessment

- 8.9 The design team commenced detailed feasibility studies early in the pre-application process to explore options to deliver the project vision and whether retention of the existing buildings in full or in part was feasible and represents a better use of the site than a new build scheme. There has been on-going engagement with LBC officers throughout, particularly given the increasing focus and changing policy context in relation to carbon in particular.
- 8.10 A report that looks at retention and redevelopment options as well as whole life carbon comparisons is submitted with the planning application. The report is a thorough collaboration of various disciplines including the architects (DSDHA), the sustainability consultant (Whitecode), and engineers (Pell Frischmann) with input from other consultants. The report includes an existing condition appraisal and interrogates three development options: the first - retention and retrofit with minimal extension; the second - retention and retrofit with extension and new build; and the third, the Proposed Development. The assessment includes a carbon and sustainability assessment for each as well as other relevant considerations. A set of criteria are established to enable comparisons to be made between the options, enabling a rigorous and transparent assessment as possible.
- 8.11 As set out in the report, a key factor for a retention option is that the existing building has a number of significant limitations, even before considering the age of the structure and the modifications that have taken place over time. The compromised ground floor level elevated approximately 2 metres above street level means that it is not possible to bring the building back into use without major modifications and temporary support.
- 8.12 As part of the previous application that was approved for the site, a feasibility report was submitted to demonstrate that at the time, the buildings failed to meet the requirements of most tenants because of their age, construction, fit-out and various site constraints resulting in buildings that were poorly configured, provided poor levels of thermal comfort and which were largely obsolete. Even after refurbishment there were significant constraints upon the space, particularly when compared to new build accommodation.
- 8.13 This was accepted by LBC Officers and Members at the time, who resolved that a redevelopment option was the most appropriate for the site. In the intervening decade since

this study was commissioned, the existing buildings have further dilapidated and there are now more onerous regulations and standards such as EPC and Fire Regulations, that make a refurbishment option even more prohibitive.

- 8.14 As expected the overall embodied carbon of the Proposed Development is the highest, but conversely it provides significantly more benefits than the other options whilst minimising impacts, including carbon. Importantly though, in delivering a higher quality, more flexible building with the urban benefits of public realm and active ground floor, it best meets the tests of utility and enduring appeal. Furthermore, the London Plan states the “best use of the land needs to be taken into consideration when deciding whether to retain existing buildings in a development.”, on this basis, the Proposed Development will achieve optimal site capacity. This therefore represents the best investment of carbon. Arguably over time, taking into account additional factors such as travel connectivity, and the way it could be adapted and refitted in future use, will result in the lowest carbon option of all over its life.
- 8.15 As noted, whilst carbon emissions from a development proposal is an important measurement, it is also necessary to take into account wider considerations and holistically assess the environmental price and the resulting benefits. The carbon used in production of the building does not consider how and by how many people the development will be used, nor how they will get there and use it. It does not consider the quality and enduring appeal of the resulting product and therefore its utility and inevitable adaptation over time.
- 8.16 The approach to exploring the range of options in terms of retention and retrofit is in line with Camden LP Policy CC1, which requires all development proposals that involve substantial demolition to demonstrate that it is not possible to retain and improve the existing building (Part E). The approach to the design has followed the decision tree set out within Chapter 2.4 of the GLA Circular Economy Guidance, exploring the potential for retention and retrofit. The feasibility study has demonstrably shown the constraints which retention would present, and that such an approach would not deliver the extent of benefits the Proposed Development would bring. This is largely due to the nature of the existing office building and its convoluted entrances and lack of level access.

## **Mixed-use Redevelopment and Loss of Office – Policy Context**

- 8.17 London Plan Policy E1 encourages improvements to the competitiveness and quality of office space of different sizes should be supported by new office provision, refurbishment and mixed-use development. It sets out that evidence to demonstrate surplus office space should include strategic and local assessments of demand and supply, and evidence of vacancy and marketing (at market rates) suitable for the type, use and size for at least 12 months, or greater if required by a local Development Plan Document.
- 8.18 Policy E1 (Economic Development) of the Local Plan supports economic development and growth provisions to safeguard existing employment sites and premises that meet the needs of industry and other employers. Policy E2 (Employment Premises and sites) sets out a general presumption in favour of the retention of employment floorspace. Development of business premises for non-business uses generally are resisted unless it is no longer suitable for such use or that the possibility of retaining, reusing or redeveloping the site or building for similar or alternative type and size of business use has been fully explored over an appropriate period of time. In terms of office provision, it sets out that the majority of office demand will be met at King’s Cross with smaller scale office development will also occur at other sites across Central London, with some provision in Camden Town.
- 8.19 Policy E2 (f) sets out that redevelopment proposals should include floorspace suitable for start-ups, small and medium-sized enterprises, such as managed affordable workspace where viable. The Employment sites and business premises CPG sets out that planning obligations to secure an element of affordable SME workspace from large scale employment developments with a floorspace of 1,000sqm (GIA or gross internal area) or more.
- 8.20 Policy SD6 of the London plan promotes the provision of a diverse range of uses to support the vitality and viability of town centres. The Camden Goods Yard Planning Framework looks to bring forward an ‘inclusive, mixed-use place with a confident identity’. New development in the ‘Chalk Farm Road’ area creates a significant opportunity to radically enhance this important part of Camden Town Centre and create an inviting gateway to existing and new neighbourhoods. The area is identified as a mixed-use area – commercial focus, and the CGY Planning Framework sets out a number of objectives, including:

- Create an engaging high street frontage on Chalk Farm Road south side and the access road. This should include an active frontage with new commercial uses at ground floor level that interact with the street and add to the character, diversity and vibrancy of the town centre. Uses should draw on the particular character of this part of the town centre;
  - Improve the environment for pedestrians and cyclists and improve the capacity and safety of the junction, which is likely to remain the main access point to the area;
  - Take the opportunity to enhance the setting of the Roundhouse.
- 8.21 The draft Local Plan seeks to provide appropriate town centre uses which open up the street frontage with the allocated uses being employment floorspace, self-contained residential floorspace, student accommodation, retail and cafes/restaurants. This is in distinction to the now superseded site allocation in the previous SALP which sought an employment-led development.

### **Mixed-use Redevelopment - Assessment**

- 8.22 The existing building contains 3,600 sqm (GEA) of office floorspace of which 2,840 sqm (NIA) has been previously surveyed useable floor space. The proposals include 824 sqm (GIA) of active ground floor commercial uses fronting Chalk Farm Road, wrapping around the PBSA lobby which respond to the edge of town centre location, Roundhouse adjacency, and busy Chalk Farm Road.
- 8.23 The scheme includes frontages to the adjacent Youth Space which is being brought forward by St George as part of the adjoining PFS scheme. Whilst the design of the Youth Space itself is an obligation for the adjoining site, the Proposed Development has been specifically designed to activate the space and provide for passive surveillance. The replacement of the dead frontage and existing wall with activated ground floor uses with level access being a key benefit of the scheme and more fitting to this high street and town centre location.
- 8.24 It is noted that the principle of a loss of employment floorspace on the site was accepted during the consideration of the previous planning application where there was a reduction in usable office floorspace from 2,840 sqm to 726 sqm. At the time, the Council acknowledged

that whilst it would result in a reduction in job opportunities on the site, the new commercial space would be significantly better quality and more suited to start-ups and SMEs. It was concluded that the provision of a variety of high quality, flexible units sufficiently outweighed the reduction of the outdated and inflexible office floorspace. This is also noting that in the Local Plan, the focus for large office floorspace in Camden will be at Kings Cross and that in locations such as this, at the edge of Camden Town, providing high quality space that is suitable and affordable for small businesses is more appropriate and fitting for the area.

- 8.25 Permission is being sought for commercial (Use Class E) space but it is envisaged that this may comprise a larger workspace to the west and retail/café space to the east.
  
- 8.26 In relation to the ground floor commercial uses, this does not strictly trigger a requirement for affordable workspace as defined by policy as it falls below 1000 sqm. However, the intention is that the floorspace be tailored to the needs of the local market.
  
- 8.27 The accompanying Regeneration Statement prepared by Volterra sets out the economic benefits of the scheme as proposed in terms of spending and employment, with up to 80 jobs expected to be generated by the completed scheme alongside 210 construction jobs during build out. The students alone within the Proposed Development are expected to spend approximately £5.2m per annum, of which £3.0m will be retained within LBC. Regal is also committed to securing real benefits to local people and is already in discussions regarding employment and training initiatives during build out and occupation. Regal also has a meanwhile operator in place using the building during the planning process to maintain economic activity on the site.
  
- 8.28 Whilst there is a reduction in employment floorspace from the current provision, the agreed position in the previous permission and direction of travel the Council is taking on the draft Local Plan in terms of a mix of uses including residential uses and student housing are noted. Throughout the pre-application process, the proposed uses have received in-principle support from Camden Council as well as the GLA, noting the priority for housing delivery.
  
- 8.29 The replacement scheme brings significant qualitative improvements and benefits in terms of placemaking, active frontages, and provision of affordable homes as part of a deliverable scheme that meets identified demand. This is also acknowledging the long-term vacancy of



the building and absence of modern fit out requirements, which was acknowledged when the previous planning application for the site was approved. As noted above, a feasibility study was submitted which evaluated the likely cost of refurbishment relative to re-development. It identified a number of characteristics of the site and the existing buildings such as the building's age, construction, fit-out and configuration which made upgrade of the building unviable. This remains the case. As noted above, clearly the existing buildings have further dilapidated since this time and the necessary regulations and requirements such as EPC, Building Regulations and Fire Safety are more onerous.

- 8.30 Furthermore, there is no loss of active employment use occurring noting that the previous occupant One Housing has relocated elsewhere in the borough. Notwithstanding this, the Applicant is offering a number of employment and training commitments in terms of construction jobs and apprenticeships and will also be making a financial contribution towards employment and training in accordance with the Employment and Business Premises CPG.

#### **Principle of PBSA/Residential-Led Scheme – Policy Context**

- 8.31 Chapter 5 of the NPPF supports the Government's objective of significantly boosting the supply of homes. Local planning authorities should plan for a mix of housing based on current and future demographic trends. They should also identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand
- 8.32 At Paragraph 60, the NPPF states that "to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay".
- 8.33 London Plan Policy H1 sets out the requirements for boroughs to achieve the increased housing supply targets set out in Table 4.1, which identifies a ten-year housing completion target of 10,380 for LBC [2019/20 to 2028/29]. The Camden Local Plan (2017) establishes a

target of 16,800 additional homes from 2016-17 to 2030-31. The draft Local Plan aims to deliver 11,550 additional homes (770 homes per year) in Camden over the period to 2041.

- 8.34 The London Plan confirms that London's higher education providers make a significant contribution to its economy and labour market and that it is important that their attractiveness and potential growth are not compromised by inadequate provision for new student accommodation. Paragraph 4.15.1 of the London Plan sets out that the housing need of students in London, whether in Purpose Built Student Accommodation (PBSA) or shared conventional housing, is an element of the overall housing need for London, and that new flats, houses or bedrooms in PBSA all contribute to meeting London's housing need. The completion of new PBSA therefore contributes to meeting London's overall housing need and is not in addition to this need.
- 8.35 London Plan Policy H15 requires boroughs to ensure that local and strategic need for purpose-built student accommodation is addressed, and that it contributes to a mixed and inclusive neighbourhood. It sets out that there is an established need for 3,500 bed spaces annually over the London Plan period (2021-2031) (equating to 35,000 bed spaces).
- 8.36 Boroughs, student accommodation providers and higher education providers are encouraged to develop student accommodation in locations well-connected to local services by walking, cycling and public transport, as part of mixed-use regeneration and redevelopment schemes.
- 8.37 Policy H9 of the Local Plan sets out that the Council will aim to ensure that there is a supply of student housing available in order to support the growth of higher education institutions in Camden and Camden's international academic reputation. The Council will seek a supply of student housing to meet or exceed Camden's target of 160 additional places in student housing per year. It sets out requirements for a range of flat layouts, at costs to meet needs of students, as well as undertakings with education institutions, and that it does not create a 'harmful' concentration of such a use.
- 8.38 Policy H9 of the draft Camden Local Plan reaffirms the current Local Plan policy and sets out that the provision of purpose-built student accommodation can help to limit additional pressure on the wider private rented market. The supporting text notes that the interest in

developing student accommodation in the borough appears to have diminished since adoption of the previous Camden Local Plan and publication of the London Plan, as indicated by a number of schemes that benefited from planning permissions but have so far failed to progress to completion on-site. The target of additional places in student housing per year increases to 200 in the draft Local Plan.

- 8.39 The Council will resist proposals for student housing that would prejudice the Council's ability to meet the annual target for additional self-contained homes and proposals should not involve a site identified for self-contained housing through a current planning permission or a development plan document unless it is shown that the site is no longer developable for self-contained housing.

#### **Principle of PBSA and Residential Uses - Assessment**

- 8.40 The proposals would intensify the use of the Site to provide accommodation for students as well as much needed affordable homes, complementary town centre uses, and new public realm. This is coming forward through a design led, high density development that accords with the policy objectives set out in the adopted Local Plan.
- 8.41 Given the site's central London and town centre location it is ideally located for intensification to optimise the use of the site and enhance the physical environment, which in turn can make a positive economic, social, and environmental contribution at a national, regional and local level in line with objectives set out in the NPPF and London Plan Policy GG1.
- 8.42 The Agent of Change principles are relevant in light of the adjacency to the Roundhouse. It is often the case that noise and disturbance generated by live music venues can be challenging in terms of traditional residential accommodation, which tends not to be the case for more transient, younger residents of student accommodation developments. Notwithstanding the findings of the acoustic report which shows that live music at the Roundhouse does not disturb the local area, the conventional homes have been located along the eastern edge of the site and the PBSA sitting between them. On this basis, the uses sit comfortably alongside each other in response to 'Agent of Change' principles.

- 8.43 The Proposed Development will provide modern purpose-built student accommodation, in a prime and desirable location for students in close proximity to some of London's biggest higher education institutions. The scheme would make a significant contribution towards Local Plan annual target of 160 new student bedspaces per year (1.7 years of target) as well as the draft Local Plan target of 200 bedspaces (1.3 years of target).
- 8.44 The London Plan notes non-self-contained accommodation for students should count towards meeting housing targets on the basis of a 2.5:1 ratio (i.e. two and a half bedrooms/units count as a single dwellinghouse). There have been instances where depending on unit configurations this has been increased to three. The completion of new PBSA therefore contributes to meeting London's overall housing need and is not in addition to this need. In this case, it would amount to circa 10% of Camden's annual housing target under the London Plan, helping to relieve pressures on the conventional housing market. This is noting that LBC has not met its annual affordable housing delivery target in recent years and the demand for social housing and wait list is increasingly growing.
- 8.45 The Council's priority for the borough is conventional housing and seeks to ensure that any proposed PBSA does not displace existing or planned provision of self-contained homes. The proposals would not displace any site allocation or planning permission for conventional housing. In terms of satisfying any concerns about saturation, existing and pipeline student accommodation indicates that the nearest PBSA is the Stay Club some 200 metres away. There are others further afield in King's Cross. The accompanying Regeneration Statement sets out the growing need for new PBSA bedspace across the borough noting the small pipeline and that the growth in bedspaces is not keeping up with the growth in student demand.
- 8.46 This is reflected in Camden's draft Local Plan which confirms that the interest in developing student accommodation in the borough appears to have diminished since adoption of the previous Camden Local Plan and publication of the London Plan, as indicated by a number of schemes that benefited from planning permissions but have so far failed to progress to completion on-site.
- 8.47 The provision of conventional C3 affordable housing on the site is strongly supported by local, regional and central government policy and maximising the supply of self-contained housing

is a key priority for the Council, noting there is a limited supply of homes in Camden and prices are high. In terms of track record of delivery, LBC has fallen short against its housing and affordable housing targets. The Proposed Development has the potential to deliver 7% of the boroughs annual affordable housing delivery target.

- 8.48 When the student accommodation and affordable housing provision is accounted for, the Proposed Development will contribute to 12% of the annual Camden Local Plan housing target of 1,120 additional dwellings per annum. As set out above, residential use on this Site is supported, and promoted, by planning policy at all levels. The London Plan identifies that town centres such as Camden Town have high residential growth potential.
- 8.49 As set out in the Camden Goods Yard Planning Framework, the area will be expected to deliver a significant number of new homes, including affordable homes. This is reinforced in draft policy, which explicitly sets out in the site allocation that student accommodation is suitable for the Site. Accordingly, the principle of a student housing residential led development on the Site is supported in planning policy terms.

## 9 Housing – Student and Affordable Housing

- 9.1 The proposals seek to bring forward a mix of purpose-built student accommodation (PBSA) alongside a standalone affordable housing block to meet identified housing need. This section assesses the affordable housing offer, the housing mix, and residential quality for future residents, and other policy requirements for PBSA and conventional housing.

### **Affordable Housing - Policy Context**

- 9.2 Section 5 of the NPPF, 'Delivering a Sufficient Supply of Homes', states that any scheme comprising 5 or more homes should provide affordable housing. It establishes that affordable housing should be delivered on-site. Annex 2 of the NPPF defines affordable housing as housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers). It defines four types of affordable housing: Affordable Housing for rent; Starter homes; Discounted market sale housing; and other affordable routes to home ownership.
- 9.3 London Plan Policy H4 seeks to maximise affordable housing delivery, with the Mayor setting a strategic target for 50% of all new homes to be genuinely affordable. London Plan Policy H5 states that the threshold level of affordable housing is a minimum of 35%, or 50% for former industrial land and public sector land. Policy H6 of the London Plan sets out the presumption that the 40 per cent to be decided by the borough will focus on Social Rent and London Affordable Rent given the level of need for this type of tenure across London.
- 9.4 Policy H15 of the London Plan sets out that in order to provide greater certainty, speed up the planning process and increase the delivery of affordable student accommodation, a threshold applies for PBSA schemes to take advantage of the Fast Track Route. To follow the Fast Track Route, the amount of affordable student accommodation provided should be at least 35 per cent of student bedrooms in the development. If the required threshold for affordable student accommodation is not met, a scheme will be considered under the Viability Tested Route in line with Policy H5 (Threshold approach to applications) and the Mayor's Affordable Housing and Viability SPG.

- 9.5 It goes on to state that the affordable student accommodation bedrooms should be allocated by the higher education provider(s) that operates the accommodation, or has the nomination right to it, to students it considers most in need of the accommodation
- 9.6 The definition of affordable student accommodation is a PBSA bedroom that is provided at a rental cost for the academic year equal to or below 55 per cent of the maximum income that a new full-time student studying in London and living away from home could receive from the Government's maintenance loan for living costs for that academic year. The affordable student accommodation should be equivalent to the non-affordable rooms in the development in terms of room sizes and room occupancy level.
- 9.7 The SPG states that the Fast Track Route enables developments to progress without the need to submit detailed viability information and without late viability review mechanisms which re-assess viability at an advanced stage of the development process.
- 9.8 The Mayor's draft PBSA LPG sets out under para 2.5.4 that while PBSA need should be addressed in line with policy H15, the inclusion of conventional (C3) housing may nonetheless be acceptable and even desirable on larger sites as part of the pursuit of mixed and inclusive neighbourhood objectives.
- 9.9 Local Plan Policy H9 sets out that student housing should have an undertaking in place to provide housing for students at one or more specific education institutions, or otherwise provide a range of accommodation that is affordable to the student body as a whole. Where proposed student housing development is not robustly secured as student housing that provides accommodation affordable to the student body as a whole, the Council will expect the development to provide an appropriate amount of affordable housing for general needs.
- 9.10 Camden's Housing CPG (2021) provides specific guidance on both housing and affordable housing in mixed use development and specifically the requirements of Local Plan Policies H2, H4, and H6.
- 9.11 As noted above, the draft Local Plan includes a policy in relation to PBSA and states that the Council will seek to ensure the maximum level of affordable student accommodation is secured in accordance with the distinctive London Plan provisions for purpose-built student

accommodation, but as an alternative will strongly encourage the contribution of on-site affordable housing in accordance with the guideline mix set out in Local Plan Policy H4 where feasible, having regard to whether developments are able to include separate blocks and/ or stair/ lift cores.

- 9.12 Policy H15 of the London Plan provides more up to date policy in relation to affordable student housing than the Camden Local Plan and this is therefore the default for assessing PBSA applications in LB Camden.

### **Affordable Housing Offer**

- 9.13 The proposed development would bring forward conventional self-contained affordable homes alongside the student housing. This comprises a standalone 9-storey building situated away from the Roundhouse and Chalk Farm Road, providing 24 affordable homes.

### Tenure

- 9.14 The tenure split of the affordable housing would comprise 13 social-affordable rented homes and 11 intermediate rented homes, which is a 63:37 split in favour of low-cost rented based on habitable rooms and 54:46 based on units. Noting the scheme is wholly affordable, the proposals align with the London Plan which set out expectations for 30% low cost, 30% intermediate and the 40% balance being low cost or intermediate products.
- 9.15 An Affordable Housing Statement, prepared by Gerald Eve, has been submitted which sets out the details and assumptions in terms of rent levels for the affordable homes. For the social rented, these will be in line with weekly rental levels set in line with the Government formula and guidance, with service charges set at a reasonable and affordable level.
- 9.16 For the intermediate rent, it is noted that Camden has comprehensive policy regarding the required rental levels and subsequent affordability and income thresholds. The CPG specifies that all providers should adopt an approach to Intermediate Rent with a range of rent levels from 40% to 80% of market rent to secure scheme viability, whilst ensuring that the majority of provision is affordable to households with incomes between £31,950 and £42,600 (2019 -



as adjusted by wage inflation). The maximum cost with a gross annual income of £60,000 would be £323 per week.

- 9.17 In this case, the intermediate units will be accessible to households earning £40,000 up to per annum for 1 bed, £55,000 for 2 bed (4p) family units and up to £60,000 for two sharers, assuming that the households do not spend more than 40% of their net income on housing costs, in line with the Camden HIS, the CPG and the wider GLA affordability criteria.
- 9.18 The affordable student accommodation (ASA) will meet the definitions in the London Plan in terms of affordability. In this case, the 42 cluster rooms will be allocated as ASA in order that students can benefit from social interaction with flatmates. There would be no distinction in terms of quality, with the cluster rooms interspersed with the other studio flats on each floor. They would benefit from the same access to all amenities and facilities.

#### Affordable Offer and Fast Track Route

- 9.19 The Applicant is proposing to meet its affordable housing obligations by bringing forward the 24 conventional C3 affordable homes alongside a proportion of affordable student accommodation (ASA) to reach the equivalent London Plan Fast Track threshold of 35%. This is to respond as far as possible to Camden's acute need for conventional C3 affordable housing whilst also responding to the strategic need for ASA across London. This approach is reflected in the Council's direction of travel as set out in the draft Local Plan.
- 9.20 As a result of detailed design studies and analysis, the proposed level of C3 housing is the maximum that is achievable on-site; therefore, to arrive at the threshold level, a "top up" with ASA is being proposed by the Applicant.
- 9.21 The proposed affordable C3 housing equates to circa 23% of the scheme based on floorspace (GIA) and habitable rooms in line with London Plan and Camden requirements. Alongside this, the 42 cluster beds in the PBSA would be allocated as ASA to 'top-up' the affordable housing offer. This blend would bring the overall affordable housing provision to 35% (in floorspace and habitable rooms).

9.22 As such, whilst a blend of different housing types, the overall level of affordable housing being proposed accords with the threshold level in the London Plan. Accordingly, there is no requirement to submit detailed financial viability information (a financial viability appraisal) with this application and it removes the requirement for a late-stage review being attached to any planning permission. As noted above, the rent assumptions set out in the Affordable Housing Statement and as above meet GLA and Camden requirements. Furthermore, the ASA would meet the definitions set out in the London Plan in terms of affordability.

9.23 This hybrid approach has been proposed elsewhere in London and has been agreed in principle with Camden and GLA officers at pre-application stage. It means that the number of traditional affordable homes is maximised in accordance with the strategic objectives of both the London Plan and Local Plan whilst also recognising an identified strategic need for ASA.

### **Student Housing – Management and Quality**

9.24 London Plan Policy H15 requires student accommodation developments to be subject specific conditions and obligations. This includes the following key requirements:

- the use of accommodation is secured for students in higher education;
- in the case of developer-led and operated schemes, there should be a nominations agreement with one or more higher education provider for the majority (51%) of bedrooms;
- the maximum level of accommodation is secured as affordable student accommodation;
- the affordable student accommodation bedrooms should be allocated by the higher education provider(s) that operates the accommodation, or has the nomination right to it, to students it considers most in need of the accommodation; and
- the accommodation provides adequate functional living space and layout.

9.25 The draft PBSA LPG elaborates on the final bullet above, stating that as well as sensible layouts of different bedroom-based amenities there are some wider considerations. These

include ensuring daylight and natural ventilation to C3 standards, achieving dual-aspect living rooms or at least a reasonable exterior outlook. Bedroom sizes should recognise that student bedspaces, even in cluster flats, are also spaces for study, storage and private socialising. Design flexibility of individual rooms and spaces will be important, but usability should be demonstrated, and crowding and conflict avoided.

- 9.26 The draft PBSA also elaborates on the Section 106 obligations that are required for PBSA schemes including reasonable endeavours to secure nominations agreements and cascade mechanisms including the order of priority and the minimum requirements as they relate to affordable student accommodation. The Mayor has also produced a Wheelchair Accessible and Adaptable Student Accommodation Practice Note (November 2022).
- 9.27 The guidance also seeks to ensure sufficient choice for people who require an accessible bedroom, development proposals for serviced accommodation should provide either of the following:
- 10 per cent of new bedrooms to be wheelchair-accessible in accordance with Figure 52 incorporating either Figure 30 or 33 of British Standard BS8300- 2:2018 Design of an accessible and inclusive built environment. Buildings - Code of practice; Or
  - 15 per cent of new bedrooms to be accessible rooms in accordance with the requirements of 19.2.1.2 of British Standard BS8300-2:2018 Design of an accessible and inclusive built environment. Buildings - Code of practice.
- 9.28 Camden’s Student Housing CPG (2019) provides specific guidance on the application of policy in relation to student housing. Specifically, it contains details on: securing a supply of student housing; creating a mixed, inclusive and sustainable community; design, standards and facilities; and planning obligations for student housing. Room sizes are expected to comply with Camden minimum HMO standards.
- 9.29 The student accommodation is being proposed as direct-let and the mix comprises 42 cluster bedrooms which are the allocated ASA rooms, together with 157 studios and 66 larger studios. The studio and larger studios include kitchenettes, providing greater choice to students in response to a recognised demand. Communal kitchen, living and dining spaces, and accessible rooms are pepper potted and meet, or in this case exceed, relevant policy and

guidance including Camden's standards within the CPG. Shared student facilities are arranged around providing communal space for social, active and focussed needs of student occupiers. At least 10% of the larger studios which would be DDA compliant, in accordance with the GLA's PBSA guidance.

- 9.30 The PBSA includes a large entrance lobby at ground floor with dining room and workspaces set around a courtyard garden. There is a gym and rooftop amenity space, as well as generous cycle storage. The Proposed Development has been designed to provide ample space for students and to enable them to be social and active, and the Student Management Plan sets out the commitments towards student wellbeing, including wellness and pastoral care.
- 9.31 A Student Management Plan has been prepared by CRM Students which details the proposed management strategy for the PBSA. This sets out the approach to day-to-day management of the facility when up and running, including travel and deliveries, move-in / move-out arrangements, safety and security, and preserving amenity of the wider community, amongst other management considerations. The arrangements have been informed by the significant experience of CRM Student who manage some 21,500 student beds nationwide. The proposed management arrangements, which will be refined prior to first occupation, are therefore informed by a proven operator.
- 9.32 The PBSA will be managed by a PBSA Accommodation Manager. The PBSA will be operated under the Accreditation Network UK (ANUK) Code of Practice ([www.anuk.org.uk](http://www.anuk.org.uk)), which is a network of organisations that promote high standards in private residential student accommodation. All lettings and building management will be handled by the Accommodation Manager. This is standard procedure for a Direct Let PBSA scheme.
- 9.33 The intention is also that the ASA rooms will be administered by the PBSA Accommodation Manager in accordance with the relevant definitions and the associated eligibility criteria. The PBSA Accommodation Manager will have an established Affordable Accommodation Scheme.
- 9.34 As encouraged in the London Plan, the Applicant envisages that use of accommodation during vacation periods to optimise the use of the facility outside the academic year. In

accordance with Camden and GLA guidance, the Applicant would look to submit a non-student management plan prior to occupation.

### **Affordable C3 Housing Mix**

- 9.35 Policy H10 (Housing Size Mix) states that schemes should consist of a range of unit sizes having regard to several factors. The factors, that applicants and boroughs should take into account, are then further explained in supporting text at paragraph 4.10.2. It also states that in terms of delivering mixed and inclusive communities, a neighbourhood may currently have an over-concentration of a particular size of unit and a new development could help redress the balance.
- 9.36 Camden's Local Plan Policy H6 states that **"the Council will aim to minimise social polarisation and create mixed, inclusive and sustainable communities by seeking high quality accessible homes and by seeking a variety of housing suitable for Camden's existing and future households, having regard to household type, size, income and any particular housing needs"**.
- 9.37 Policy H7 of Camden's Local Plan states that **"the Council will aim to secure a range of homes of different sizes that will continue to creation of mixed, inclusive and sustainable communities and reduce mismatches between housing needs and existing supply"**. Housing developments will be expected to contribute to meeting the priorities set out in the Dwelling Size Priorities Table and include a mix of large and small homes.
- 9.38 Policy H7 goes on to state that the Council will take a flexible approach to assessing the mix of dwelling sizes proposed in each development, but having regard to a number of factors such as the different dwelling size priorities for different tenures, evidence of local needs from borough wide priorities, the character of the development, the site and the area, including the impact of the mix on child density, site size and any constraints on developing the site for a mix of homes of different sizes.

9.39 Camden Council's Dwelling Size Priorities Table sets out the following:

	1-bedroom (or studio)	2-bedroom	3-bedroom	4-bedroom (or more)
<b>Social-affordable rented</b>	lower	high	high	Medium
<b>Intermediate affordable</b>	high	Medium	lower	lower
<b>Market</b>	lower	high	high	lower

*Table 4: LBC dwelling mix priorities*

9.40 The proposed mix of homes for the affordable housing building is as follows:

	1 bed 2p	2b/4p	3b/5b	Total	HR	% HR
<b>Social rent</b>	2	5	6	13	49	63
<b>Intermediate</b>	4	7	0	11	29	37
<b>Total</b>	6	12	6	<b>24</b>	78	
<b>%</b>	25	50	25			
<b>Average area (sqm)</b>	53	70	94			

*Table 5: proposed housing mix*

9.41 As noted in the table above, the family sized homes are allocated to the social rented tenure, with 46% of the social rented homes being 3-bed 5 person homes. The next priority is 2-bed with 38% of the social rented homes being 2 bed 4 person homes. As noted in the London Plan, well-designed homes providing 2 (or more) bedrooms can contribute to London's need for family homes. Overall, three quarters of the homes are two bed or larger, which aligns with Camden's Dwelling Size Priority Table.

9.42 There are also practical reasons for the housing mix that has been arrived at. The site's location, both existing and in terms of a thriving, busy, town centre make it less suited to large numbers of families. This is due to factors including reduced opportunities for direct / level access to private play space and open space for families with children.

## Residential Quality – Policy Context

- 9.43 Policy D6 of the London Plan sets policy requirements relating to housing quality and standards and recognises that qualitative aspects of a development are key to ensuring successful sustainable housing. These policies are in line with the National Technical Housing Standards – Nationally Described Space Standards (2015).
- 9.44 The National Design Guide, under H1, sets out that well-designed homes and communal areas within buildings provide a good standard and quality of internal space. This includes room sizes, floor-to-ceiling heights, internal and external storage, sunlight, daylight and ventilation. The quality of internal space needs careful consideration in higher density developments, particularly for family accommodation, where access, privacy, daylight and external amenity space are also important
- 9.45 Additionally, the Mayor’s Housing SPG provides further design standards for the quality of housing built in Greater London. Standard 12 of the Mayor’s Housing SPG sets out that each residential core should be accessible to generally no more than 8 units on each floor. Standards 13 to 16 set out further design guidance for shared circulation, including access provisions, natural light, ventilation and lift access.
- 9.46 The Mayor’s Good Quality Homes for all Londoners LPG has recently been produced to help interpret and implement the new London Plan. Module C sets out a series of quality and standards for housing design which build on the current Housing SPG standards. This is with reference to private internal space, privacy, aspect and outlook, daylight, sunlight and overshadowing, indoor air quality and noise.
- 9.47 The LPG sets out that all new dwellings should be dual aspect unless there are exceptional circumstances that justify the inclusion of any single aspect homes. Where single-aspect dwellings are proposed (by exception), the design team should demonstrate how good levels of ventilation, daylight, privacy and thermal comfort will be provided to each habitable room and the kitchen.
- 9.48 Policy H6 of the Local Plan sets out the Councils requirements for the design of high-quality homes with paragraph 7.33 stating that “**new dwellings and conversions to residential use**

**will be expected to meet the government’s nationally described space standard as set out in the London Plan. The Council will also require development to adhere to the Mayor’s Housing Supplementary Planning Guidance”**

- 9.49 The Council will encourage design of housing to provide functional, adaptable, and accessible spaces, expect all self-contained homes to meet the nationally described space standard, require 90% of new build self-contained homes to be accessible in accordance with Building Regulations M4(2) and 10% to be suitable for occupation by a wheelchair user or easily adapted in accordance with Building Regulations M4(3)
- 9.50 The assessment below is focussed on the conventional C3 housing but also addresses the quality of the student housing where relevant and not referenced in the affordable housing section above.

#### **Residential Quality - Assessment**

- 9.51 The proposed homes have been designed to meet the guidance the London Housing Design Standards LPG, including the minimum apartment sizes set out in the Nationally Described Space Standards. The efficient layout of the building result in well-considered dwelling layout arrangements. All homes are dual aspect with good outlook and there are no single aspect north facing homes. The minimum of 2.5 metre floor to ceiling would be achieved in accordance with the London Plan and individual room sizes reflect the Mayor’s Housing Design Standards. The DAS sets out further details on how the scheme achieves a suitable high standard of accommodation for future residents.
- 9.52 Private Amenity Space
- 9.53 All of the homes would benefit from private amenity space in the form of balconies or terraces which meet or exceed minimum standards set out in relevant housing design guidance. The deck access also provides opportunity for external amenity for residents. Balconies are indicated on floor plans and within the accompanying DAS and residential accommodation schedule.



### Wheelchair Housing

- 9.54 The scheme has been designed to meet Building Regulation requirements with three of the homes (10%) being designed to Building Regulations Part M4(3) wheelchair accessible standards. These prioritise the 3 bed social rented and are distributed over 2<sup>nd</sup>, 3<sup>rd</sup> and 4<sup>th</sup> floor. The submitted DAS and accommodation schedule sets out how the scheme meets inclusive design requirements and where, in line with Policy D5 and Policy D7 of the London Plan and Policy H6 of the Local Plan.
- 9.55 Each floor within the building is level and step free, with wheelchair accessible passenger lifts and stairs from circulation cores. All communal spaces and access doors are wheelchair accessible designed to meet Part M and the amenity and commercial spaces would have unisex accessible WC. This is set out further in the DAS.

### Privacy and Overlooking

- 9.56 The Proposed Development also seeks to maximise privacy for existing and future residents and minimise overlooking. The affordable block is set back from the street with outlook across the railway and Youth Space, to maintain the privacy of future residents of the Proposed Development. Consideration has been given to the future development of the PFS site and a blank flank elevation is proposed adjacent to the boundary. The stairwell provides a buffer between the residential building and the PBSA so there is no direct overlooking between the two buildings.
- 9.57 In terms of the PBSA, as set out in the DAS, the drum like nature of the scheme means that there are adjacencies which will be managed through the window configurations, fins and design.
- 9.58 The front elevation of the PBSA block fronting Chalk Farm Road 10 metres from the centre line of the road which is typical of such a town centre location and maintains that the privacy of residents on the opposite side of Chalk Farm Road. The distances across the railway are such that residents of the current (and future) Juniper Crescent will not be impacted.

### Internal Daylight and Sunlight

- 9.59 The design team have also sought to maximise the natural light within the proposals whilst also taking into account factors such as overheating and the need for solar shading. An assessment carried out by Consil has used the more recently established illuminance methodology described in the BRE Guide. The results show that adequate levels of daylight and sunlight amenity would be received within the proposed apartments and student accommodation, with the vast majority of living areas and study areas receiving good levels of amenity. Across the scheme 84% of the rooms assessed would meet or exceed the minimum recommended guideline values given by the BRE for daylight amenity.
- 9.60 Future occupiers of the Proposed Development will have access to a generous outdoor communal space which will, in part, be sunlit year round. The ground floor level and roof top amenity spaces will also have good access to sunlight and the occupiers will have a choice of which space to enjoy.
- 9.61 With the public realm fronting Chalk Farm Road situated to the north of the development this inevitably means that sunlight is received for shorter periods or confined to smaller parts of each space. The space also offers opportunity for shade, which will be welcomed for summer months. On balance, the benefits of providing the setback building line and expansive public realm for residents, visitors and workers with seating areas in this busy town centre location, are balanced against the shortfall in sunlight to the space.
- 9.62 All of the proposed homes are designed to reduce the risk of overheating through orientation, layout and the natural cross-ventilation afforded by dual aspect. The proposed terraces and access galleries provide shading to windows.

### Internal Noise Levels

- 9.63 The scheme has been carefully designed to ensure residents achieve a satisfactory level of acoustic amenity to future residents, noting the adjacent road and railway. As set out elsewhere, Agent of Change principles and respecting the adjoining live venue music have

been central to the scheme and the fenestration and ventilation systems will ensure that background noise, air quality and overheating are satisfactorily addressed.

### **Summary**

- 9.64 As a higher density scheme, careful attention has been paid to ensuring a well-designed development that will promote quality of life of occupants, including meeting minimum space standards for the new homes, with good aspect, outlook, privacy, and private amenity space.
- 9.65 The Proposed Development will contribute to social interaction and inclusion, in accordance with principles established in the NPPF, National Design Guide, London Plan, accompany supplementary guidance, and Camden Local Plan.

## 10 Design Principles

- 10.1 This section of the Statement assesses the proposal against relevant design planning policies contained in national and local planning policy documents in relation to layout, height, scale and massing, architecture and appearance, including a tall building assessment. Further details on the design can be found in the submitted Design and Access Statement, prepared by DSDHA.

### Design Principles - Policy Context

- 10.2 The Government attaches great importance to the design of the built environment in the NPPF. Paragraph 126 states good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Paragraph 130 of the NPPF states that planning policies and decisions should ensure that developments will function well and add to the overall quality of the area, be visually attractive as a result of good architecture and effective landscaping, be sympathetic to local character and history, establish or maintain a strong sense of place, optimise the potential of the site and create safe places.
- 10.3 The NPPG on Design, which supports section 12 of the NPPF, states that LPAs are required to take design into consideration and should give great weight to outstanding or innovative designs which help to raise the standard of design more generally in the area.
- 10.4 London Plan Policy GG1 Building Strong and Inclusive Communities seeks to ensure that new buildings and the spaces they create are designed to reinforce or enhance the identity, legibility, permeability and inclusivity of neighbourhoods, and are resilient and adaptable to changing community requirements.
- 10.5 London Plan Policies D1 to D3 apply to the design and layout of the development and set out a range of urban design principles relating to the quality of the public realm, the provision of convenient, legible movement routes and the importance of designing out crime by maximising the provision of active frontages.

- 10.6 London Plan Policy D2 states that the density of development should be proportionate to the site's connectivity and access to public transport.
  
- 10.7 London Plan Policy D4 outlines that the design of development proposals should be thoroughly scrutinised. The scrutiny of a proposed development's design should cover its layout, scale, height, density, land uses, materials, architectural treatment, detailing and landscaping.
  
- 10.8 Policy D5 of the London Plan states that development proposals should achieve the highest standards of accessible and inclusive design and that proposals should deliver high quality people focused spaces, which are convenient and welcoming with no disabled barriers.
  
- 10.9 Policy D9 of the London Plan determines that it is the responsibility of individual boroughs to identify appropriate locations for tall buildings. When tall buildings are proposed, development proposals should address the various criteria that are specified in relation to visual impacts, functional impacts, environmental impacts and cumulative impacts.
  
- 10.10 At a local level, Policy D1 of the Camden Local Plan seeks to secure high quality design in development and to ensure that new developments are attractive, safe and easy to use. The policy lists what characteristics LB Camden will expect to achieve this policy objective including requiring development to respect local context and character, preserves or enhances the historic environment and is of sustainable and durable construction.
  
- 10.11 Policy D1 of the Local Plan specifies the assessment of tall buildings within the borough. It states that the assessment will give particular attention to how the building relates to its surroundings, the historic context of the building's surroundings, the relationship between the building and views, the degree to which the building overshadows public spaces and the contribution a building makes to pedestrian permeability and improved public accessibility.
  
- 10.12 Camden Local Plan Policy C6 seeks to promote fair access and remove the barriers that prevent everyone from accessing facilities and opportunities. The Council will expect all buildings and places to meet the highest practicable standards of accessible and inclusive

design so they can be used safely, easily and with dignity by all. The Council will seek to ensure that development meets the principles of lifetime neighbourhoods.

- 10.13 LBC has also published a Planning Guidance CPG (January 2021) which establishes design principles to be used in the assessment of development proposals. The document reinforces or where necessary amplifies existing guidance and defines the Council's expectations for new buildings, as positive and enduring additions to this unique urban landscape.
- 10.14 The Camden Goods Yard Planning Framework also sets out a number of design objectives for the local area. These are reflected in the draft site allocation this part of the centre which notes that this part of Camden Town Centre is fragmented, and considered to detract from the overall character and vitality of the Town Centre. Key requirements from the Council are to provide high quality design that is appropriate to the high street location, enhances the setting of the Roundhouse, and respond to the area's historic context.

#### **Design Principles – Assessment**

- 10.15 The Proposed Development has been developed sensitively in the context of the Site and its surroundings. It would create a scheme of high quality in accordance with Policy D1 of the Camden Local Plan. The supporting Design and Access Statement prepared by DSDHA provides a full explanation and assessment of the design of the Proposed Development and how it has evolved through pre-application discussions in response to Officer comments. Full justification for the Proposed Development in heritage townscape terms is provided in the accompanying Heritage, Townscape and Visual Statement prepared by Turley.

#### **Layout**

- 10.16 The approach to site layout centres around making the most of the opportunities presented by this high street location, to create more public realm and active frontages. An important consideration has been taking account of the boundary conditions with the railway at the rear and the Roundhouse to the west in terms of heritage impact and Agent of Change principles.

- 10.17 The accompanying DAS sets out the design evolution that has taken place, taking account of the site constraints and opportunities. The Applicant is aware of the changing context especially in relation to the PFS which due to be reconsidered. As such, the Proposed Development future proofs the boundary conditions to ensure that the schemes can work together. It is acknowledged that there may need to be an interim position agreed in relation to the Youth Space in particular and as noted elsewhere, the Applicant is keen to assist with custodianship of the Youth Space as a direct neighbour.

### **Height, Scale and Massing**

- 10.18 The current context surrounding the Site is mixed; the general heights in the immediate proximity of the Site are mid-rise with two to four storey buildings along Chalk Farm Road and up to eight storeys within the wider context, with occasional taller buildings further afield to the north behind the high street. The emerging pattern of development on the south side of Chalk Farm Road is of larger scale buildings including the Camden Goods Yard development with buildings up to 14 storeys and the adjacent former petrol filling station with consent for an office building of 6 storeys. These provide a backdrop for the Proposed Development as shown in the views analysis. The future Juniper Crescent redevelopment is also a consideration, albeit the design proposals are still at an early stage. The proposed buildings are not considered to be ‘substantially taller than their neighbours’ and given the emerging context the proposals would not substantially change the skyline.
- 10.19 The proposals combine three, interlinked, circular forms of varying dimensions and heights. The tallest proposed cylinder is set back from Chalk Farm Road adjacent to the Roundhouse which reduces its prominence in closer street views. The proposed approach to scale and massing has resulted from extensive design workshops with LBC and Design Review Panels as well as the GLA. The process has been iterative with careful consideration given to the Site and surrounding context, and wider townscape views, particularly of the Roundhouse in views down Haverstock Hill.
- 10.20 The design evolution as set out in the DAS observes that the proposed massing arrangements with lower buildings located towards the front of the site ensure a more human scale that is fitting to the high street, as well as sitting comfortably in the context of the emerging skyline.

- 10.21 This layered approach is a considered response to collaborative working with LBC officers and other stakeholders. The principle of concentrating taller elements of the proposals to the rear of the Site (adjacent to the rear of the Roundhouse and the Overground railway line) and then stepping down in height towards Chalk Farm Road (and street-scene edge of this part of the Regent's Canal Conservation Area) moderates the scale of the Proposed Development.
- 10.22 The cylindrical shape of the proposed drums not only responds to the form of the adjacent Roundhouse, but also acts to allow the height of the proposed elements to appear recessive in their wider context. The careful treatment of the crown of each element, and with the proposed brick plinth, will architecturally divide the perceived massing of the building into a top, middle and bottom. This reduces the perception of overall mass.
- 10.23 Attention has been paid to the design of the top of the buildings, which will make a positive contribution to the existing and emerging skyline and not adversely affect local or strategic views.
- 10.24 It is considered that the Proposed Development meets all of the criteria required by Local Plan policy D1 for tall building proposals as well as the requirements of London Plan Policy D9, a broad assessment of which is set out below.

#### Tall Building Assessment

- 10.25 The scheme includes buildings over 30 metres high, making the scheme referable to the Mayor of London. Camden policy sets out that all of Camden is considered sensitive to the development of tall buildings and as such an assessment under London Plan Policy D9 is appropriate for the Proposed Development. There are a number of criteria which tall building proposals must be assessed against for them to be supported as an appropriate form of development.
- 10.26 London Plan Policy D9(C) states development proposals for tall buildings should address the following impacts:
- i Visual impacts.



- ii Functional impacts.
- iii Environmental impact.
- iv Cumulative impact.

10.27 London Plan paragraph 3.9.1 notes that tall buildings of exemplary architectural quality and in the right place can make a positive contribution to London's cityscape.

10.28 The impacts are set out in the accompanying studies, including the DAS, Heritage and TVIA, as well as other technical documents and are summarised as follows:

#### Visual impacts

10.29 This relates to a considered balance of elements including views, spatial hierarchy of the surrounding context, legibility and wayfinding, architectural quality, heritage assets and glare.

10.30 The Heritage and Townscape and Visual Statement prepared by Turley clearly assess the visual impacts of the scheme, with a number of wireline and rendered verified views showing the Proposed Development in its context. The report establishes that the Proposed Development takes account of, and limits harm to, the significance of London's heritage assets and their settings and would positively contribute to the character of the area.

10.31 The architectural quality and materials are of a high standard and have been specifically chosen to respond to the rich heritage of the area and to ensure that the appearance and architectural integrity of the building is maintained through its lifespan. The materials would ensure that there would be no reflected glare.

10.32 The public realm has been designed specifically to improve the conditions along Chalk Farm Road, opening up the site and providing level access, delivering significant uplift in open space for local residents, workers and visitors.

### Functional Impacts

- 10.33 Policy D9.C.1 of the London Plan requires that development proposals address internal and external design, including construction, servicing, maintenance, emergency routes and management.
- 10.34 The various reports prepared by the architects, and other technical consultants demonstrate that delivery of a high-quality, sustainable development has been at the forefront of the proposals from initial design concept
- 10.35 Supporting documents set out details in relation to day-to-day servicing, deliveries, refuse strategy, and longer-term maintenance implications. As a PBSA development, a Student Management Plan has been produced and consideration been given to moving in and out arrangements to ensure that this can take place without impacting upon the surrounding road network, for instance. The various documents clearly demonstrate that on-going sustainability and the long-term affordability of running costs and service charges have been taken into consideration. There is sufficient capacity within the current and planned transport network to accommodate new residents and users of the development, and all of the servicing requirements of the development can be managed on-site or from a loading bay on Chalk Farm Road.

### Environmental Impacts

- 10.36 Policy D9.C.2 requires consideration of the microclimatic impacts of tall buildings including wind, daylight, and sunlight penetration around the building and neighbourhood. The findings of the Daylight and Sunlight report demonstrate that conditions within the communal external amenity spaces, at balcony level as well as within the public realm around the building will be suitably high. The results of the studies have informed the design of the proposals, including the location of play space.
- 10.37 Whilst there would be some limited daylight impact to some neighbouring properties, on balance these deviations are acceptable in accordance with BRE standards, given the nature

of the use and low number of windows that are affected, and given that retained daylight is typical of urban development.

- 10.38 The Wind Report concludes that the wind conditions evaluated for sensitive receptors, both on and off site, are predicted to be suitable for their intended use.
- 10.39 From the outset the Applicant has sought to ensure that any environmental effects are mitigated or minimised with the Screening Opinion (ref. 2024/0029/P) establishing principles that have informed the evolution of the scheme. As a result, the scale and location of the buildings in this location will not give rise to any unacceptable impacts. As confirmed by LBC in their screening opinion it is considered that the development is unlikely to have significant environmental effects that necessitated an Environmental Impact Assessment.

#### Cumulative Impacts

- 10.40 Policy D9.C.3 requires consideration of visual, functional and environmental impacts of proposed, consented and planned tall buildings. In this instance, the context for the Proposed Development is evolving with Camden Goods Yard masterplan underway, and Juniper Crescent housing estate proposed for redevelopment with buildings of scale. There are several schemes around Chalk Farm station which have permission but have not commenced for taller buildings than their surroundings. All of these schemes have been taken into account as part of the consultant's assessments and are indicated in the HTVS.

#### **External Appearance and Materials**

- 10.41 The use of a high-quality material palette ensures that the proposed building is robust, efficient and fit for the life of the development in accordance with London Plan policy D1 and Local Plan policy D1. The architectural treatment and material palette has been developed to reflect and complement the local townscape character, informed by the widespread use of masonry/brick in the conservation area and wider surviving historic townscape, notably the railway character.
- 10.42 The proposed materials have also been chosen for their durability, longevity and sustainability in addition to their appropriateness in the context of the Grade II\* listed

Roundhouse and the historic industrial landscape of the Camden Goods Yard in a prominent townscape location. Where possible, materials have been selected which allow for re-use and recycling.

- 10.43 The proposed brickwork plinth has been designed with reference to the form and presence of the Camden wall, the boundary wall that previously separated Chalk Farm Road from the railway lands. The proposed plinth varies in height between single-storey and two-storey to form a continuation of the wall and to create a composition of curved brick forms that build on the relationship to the high street that is established by the Roundhouse.
  
- 10.44 The façade is composed of strong horizontal bands at each floor with fluted terracotta panels spanning between vertical fins. The primacy of the horizontal bands reduces the verticality of the taller cylinders and reinforces the rounded form. The fluted panels bring variation and depth to the building's skin at a more intimate scale through their manipulation of light and shadow.
  
- 10.45 The buildings are each topped with a filigree 'crown' that intends to dematerialise the top of the buildings and emphasise the infrastructural quality of the primary elements of the metal veil.
  
- 10.46 The Proposed Development provides an active frontage and visually interesting street level elevations at the local scale and an overall attractive appearance in the tested views. In addition, the building ensures the highest standards of energy performance and sustainability as well as accessibility and inclusive design as set out in the Design and Access Statement.

### **Inclusive Design and Accessibility**

- 10.47 Throughout the design process, accessibility has been a key consideration noting the site's current impenetrable nature. Full details of how the scheme has incorporated inclusive design principles can be found in the DAS but a key benefit of the scheme is providing accessible public open spaces off Chalk Farm Road for the benefit of residents, workers and visitors to this part of the town centre.

- 10.48 The scheme has sought to incorporate the principles of inclusive design wherever possible, with level access to all parts of the proposed buildings being achieved via a DDA compliant lift. Further, all doors and corridors will be designed for easy movement by wheelchair users and the podiums and external amenity terraces areas are to be accessed via level thresholds.
- 10.49 The proposed buildings have been designed to appear, as well as be, fully accessible as accessibility is also influenced by perceptions as well as physical factors. Inclusion will be maintained and managed daily. The Proposed Development is therefore considered to be in accordance with London Plan Policy D5 and Policy C6 of the Local Plan.

### **Crime and Safety**

- 10.50 The design has also considered and addressed the potential impacts of the proposals on crime and community safety from an early stage. The active frontage at ground floor level encourages flows of movement which create vibrancy and natural surveillance and in doing so increase safety.
- 10.51 Following consultation with the London Safety Centre to discuss Secure By Design matters, the design team has been looking carefully at the public realm in particular, noting the high street location and proximity to the Roundhouse which attracts large crowds. There are general concerns about street drinking and rough sleeping in the area and eliminating opportunities for anti-social behaviour is a key objective.
- 10.52 Further details are set out in the DAS including security measures and strategies such as lighting, surveillance and estate management. One aspect which has been noted and supported during engagement is the fact that there will be full time staff and 24 hour security on site, with video surveillance to monitor the new public spaces. As noted above, there are concerns about anti-social behaviour in this part of Camden and permanent surveillance, including over the new Youth Space is another benefit of the scheme.
- 10.53 These details will evolve further as the scheme progresses through more detailed design stages and a condition requiring further engagement on this element given the issues in the area and prominence of the site would be welcomed.

## Summary

- 10.54 In summary, the final design proposals provide an inherently sustainable development of high architectural quality that is fitting to this high street and town centre location. It carefully responds to the adjoining Roundhouse, by opening up views and optimises the setting of the adjacent future Youth Space. In accordance with the NPPF, the London Plan and the Camden Local Plan, innovative architecture is being used to enhance and complement the Site's immediate and wider context whilst providing a space which is accessible and safe for all.
- 10.55 The final design of the scheme has followed an extensive engagement process with Camden and GLA officers and other stakeholders and close consideration of context, views and placemaking principles.
- 10.56 The proposal brings significant benefits for both the surrounding built environment and the existing local community. One of the key drivers and benefits of the Proposed Development is the spaces that are created around the buildings, including the provision of publicly accessible open space and opening up an otherwise inaccessible and closed off site.
- 10.57 Overall, the Proposed Development brings numerous benefits that would outweigh any perceived limited and less than substantial harm in heritage terms as set out below, which are detailed throughout this report.

## 11 Heritage, Visual Impact and Townscape

- 11.1 This section of the Statement assesses the Proposed Development within the context of its historic environment and the statutory duty to have special regard to the desirability of preserving or enhancing conservation areas.
- 11.2 A full analysis of the impact of the Proposed Development on designated heritage assets is included within the Heritage, Townscape and Visual Impact Statement ('HTVS') prepared by Turley and submitted as part of the application. Turley has been engaged from early inception of the scheme to guide and advise on heritage matters.

### **Legislative Context**

- 11.3 Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 provides that decision makers are required to have "special regard" to the desirability of preserving listed buildings and their settings.
- 11.4 Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of conservation areas.

### **Policy Context**

- 11.5 The Government has attached great importance to conserving and enhancing the historic environment in the NPPF. The NPPF advises that decisions on applications with implications on designated heritage assets should be made based on the significance of the asset, and the harm (substantial or less than substantial) that the proposals would cause to the significance of the heritage asset.
- 11.6 Paragraph 194 of the NPPF states that planning applications should best describe the significance of any heritage assets affected, including any contribution made by their setting.
- 11.7 Paragraph 197 of the NPPF states that in determining planning applications, local planning authorities should take account of:

- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
  - the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
  - the desirability of new development making a positive contribution to local character and distinctiveness.
- 11.8 Paragraph 199 of the NPPF states that in assessing impact, the more important the asset, the greater the weight should be given to its conservation. It notes that significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting.
- 11.9 Paragraph 200 states that any harm, of loss of, the significance of a designated heritage asset should require clear and convincing justification and that substantial harm to, or loss of Grade II listed buildings should be exceptional.
- 11.10 Paragraph 201 notes that where a Proposed Development will lead to substantial harm, local planning authorities should refuse consent unless it can be demonstrated that the substantial harm is necessary to achieve substantial public benefits.
- 11.11 In Paragraph 202, the NPPF states that 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, securing its optimum viable use.
- 11.12 London Plan Policy HC1 states that development proposals affecting heritage assets, and their settings should conserve their significance, by being sympathetic to the assets’ significance and appreciation within their surroundings.
- 11.13 Camden Local Plan Policy D2 states that the Council will preserve and where appropriate enhance Camden's heritage assets and their settings. In relation to conservation areas, the policy says that the Council will take into account of Conservation Area Statements, Appraisals and Management Strategies.



- 11.14 Regarding heritage, the Design CPG sets out that, *inter alia*, the Council will take account of the desirability of sustaining and enhancing heritage assets and putting them to viable uses consistent with their conservation.

### **Assessment**

- 11.15 The significance of the designated heritage assets and the impact of the proposals upon the relevant heritage assets, townscape character and associated visual receptors have been identified and assessed in detail in the accompanying Heritage, Townscape and Visual Statement (HTVS), in accordance with the relevant NPPF paragraphs, regional and local planning policies and statutory duties. The HTVS has been prepared by Turley, townscape and heritage consultants, with images produced by visualisation specialists, AVR London.

### Townscape Assessment

- 11.16 The proposals fall within the Regent's Canal Conservation Area. The Site is not statutorily listed, but consideration has been given to the surrounding listed buildings and the impact this proposal may have. The Site has no heritage significance in the context of the conservation area and makes a neutral contribution to its character and appearance. The existing boundary wall makes some limited contribution the significance of the conservation area but has a detrimental impact on the public realm.
- 11.17 The Site also makes no specific contribution, as an element of setting, to the significance of the Primrose Hill Conservation Area, which is of its own distinct special interest and appearance.
- 11.18 The existing building and Site currently present an imposing and inactive frontage to the southern side of Chalk Farm Road. The application proposals have been designed to respond positively to the character of the surrounding townscape in terms of disposition of massing, material palette and architectural articulation. The proposals constitute buildings of high-architectural quality to transform the Site that otherwise detracts from the townscape and this part of the Regent's Canal Conservation Area.

- 11.19 The Proposed Development will positively transform the Site into one that directly engages with the street scene. The step change in height and massing of the proposed buildings is to mitigate the overall impact on the townscape and complement the emerging pattern of urban change in the Camden Goods Yard Framework Area. The proposals will also engage positively with the youth amenity space, avoiding unnecessary physical enclosure to new public realm and facilitate activity and movement in the public realm.
- 11.20 Whilst a small portion of the Site is within the foreground of the LVMF viewing corridor (LVMF Parliament Hill 2A.2), it is not visible in the view due to the considerable separation distance, topography and the nature and extent of intervening-built form in the wider City townscape.
- 11.21 There will be neutral to beneficial impacts on the townscape character of the identified Townscape Character Areas 2 (North of Chalk Farm Road), 3 (Primrose Hill) or 4 (Belsize Park) meeting the objectives of Development Plan policies regarding strategic and local views and good design appropriate to surroundings.
- 11.22 As concluded by the HTVS, the proposals will act to regenerate a presently poorly contributing site, improving its condition so that it plays a positive role, increasing and facilitating increased activity within the townscape.

#### Heritage Assessment

- 11.23 The architectural rationale has been developed to ensure that the Proposed Development is designed to a high standard and quality whilst not dominating the Grade II\* listed Roundhouse which sits next to the Site. The external architectural interest of the Roundhouse is derived from its distinctive circular form and robust industrial design. Its special interest is best understood internally where much of its original form and structure remains.
- 11.24 The existing buildings on the Site are negative elements in the immediate setting of the listed building and do not contribute to its significance in a meaningful way. The proposals will deliver heritage benefits through demolishing the existing building and its damaging connection to the Roundhouse, with new development designed to better reveal the

Roundhouse's external form and significance. The proposed active frontage will also enhance the engagement with the street scene at this part of the Regent's Canal Conservation Area.

- 11.25 The existing Site building is connected to the Roundhouse and relies upon it for some structural support. The accompanying application for listed building consent provides for necessary works to remove these elements from the Roundhouse and to make good the associated listed fabric of the building. The removal of these poorly conceived elements is a heritage benefit in that it will preserve the structural integrity of the Roundhouse, helping to ensure its long-term future and continued use.
- 11.26 A Heritage Engineering Report has been prepared by Pell Frischmann to explain the engineering decisions that have been taken to eliminate or minimise the potential risks to the Roundhouse. This report concludes that the Proposed Development will create an opportunity to repair any existing defects in a substantial portion of the Roundhouse perimeter wall which has been hidden for a long period of time. The repairs will be sympathetic and traditional to the existing fabric, taking the opportunity to enhance the heritage asset in accordance with Policy D2 of the Local Plan.
- 11.27 In relation to the brick boundary wall which sits along the back edge pavement to Chalk Farm Road, this is a remnant of the much greater wall that once enclosed Camden Goods Station and Yards from the wider townscape to the north of Chalk Farm Road. It has been significantly altered and reduced in height over time and makes a limited positive contribution to the significance of the conservation area, but at the same time has a detrimental impact on public realm and how the site engages with the street. Previously, the redevelopment proposals that were approved involved demolition of the wall and no objection raised by Historic England (then English Heritage). As found today, the residual section of wall within the Site stands in stark contrast to the well-preserved and intact listed wall to the south-east. As set out in the HTVS, its removal is justified in terms of the opportunity that it facilitates for creating a greatly improved public realm and much improved engagement of the Site with the streetscape as well as improving the functional setting of the Roundhouse. In addition, some mitigation of the identified harm is also achieved through the signalling of the 'memory' of the wall included within the design of the public realm.

- 11.28 The grade II listed Cattle Drinking trough, located outside of the Site on public land directly adjacent to the highway, has been identified as ‘at risk’ on the Heritage at Risk Register maintained by Historic England. The Proposed Development envisages its better integration into the new public realm and will be pursued as part of wider and associated proposals for highway improvement works under S278 (including the necessary application for listed building consent).
- 11.29 Notwithstanding the heritage, townscape and visual benefits of the Proposed Development, the application proposals will cause some minor, less than substantial harm (at the lower end of the scale within this category) to the heritage significance of Regent’s Canal Conservation Area and the Grade II\* listed Roundhouse. Where less than substantial harm has been identified, Paragraph 208 of the NPPF and Policy D2 of the Local Plan is engaged, and such harm is outweighed by public benefits of the proposals.
- 11.30 The application proposals will have no impact on the special interest of the Horse Hospital (Grade II\*), Chalk Farm Road Underground Station (Grade II), Drinking Fountain (grade II) and Cattle Trough (Grade II). The latter element is capable of enhancement through associated proposals for relocation and repair.
- 11.31 Overall, the application proposals have been designed to meet objectives for the meaningful re-use and regeneration of the site, sound principles of urban design and townscape enhancement, with the intent of avoiding harm to heritage significance wherever possible. Where some limited harm is unavoidable, the application proposals have sought where practicable to mitigate that harm. As well as satisfying relevant legislation and policies from the NPPF, and for the reasons set out above, the proposals are in compliance with London Plan Policies D3 and HC1, and Local Plan Policy D2 which requires the conservation or enhancement of heritage assets and their settings. The development is well designed, takes into account local design and planning guidance and results in innovative design which raise design quality in the area whilst fitting in with the overall form and layout of their surroundings.

## 12 Landscaping, Public Realm and Trees

- 12.1 This section considers the public realm and landscaping in respect of the Proposed Development, which has been designed by BBUK as detailed in the Landscaping Chapter of the DAS.

### **Green Infrastructure - Policy Context**

- 12.2 Paragraph 152 of the NPPF states that new development should be planned for in ways that avoid increased vulnerability to the range of impacts arising from climate change and can help to reduce greenhouse gas emissions, such as through its location, orientation and design
- 12.3 Policy G1 Part D of the London Plan requires that development proposals include appropriate elements of green infrastructure, such as street trees, green roofs, and natural or semi-natural drainage features.
- 12.4 Policy G5 of the London Plan sets a new requirement for major development proposals to contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature based-sustainable change. The policy advises boroughs to set their own scores but advise 0.4 for developments that are primarily residential, providing details on how this score is calculated.
- 12.5 At a local level, Camden Local Plan Policy A2 seeks to protect and enhance access to open space and green infrastructure within the Borough. Policy A2 (M) states that new development proposals within the LBC will be required to apply a standard of 9 sqm per occupant for residential schemes and 0.74 sqm for commercial developments. For student accommodation, the Council will see 9 sqm per single room, but multiplies this by a factor of 0.75 due to the fact that it is not often used for part of the year.
- 12.6 The CPG mirrors the open space requirements set out in Policy A2 and the London Plan standards on play space, which seeks 10 sqm per child. Camden's Public open space CPG (2021) noted that playspace should be calculated in addition to open space. It does however make an exception to the policy by recognising that the 9 sq. m of open space per resident

would, reasonably, already include an allowance for play provision and consequently the Council will seek an additional 6.5 sqm per child (instead of the 10sq. m per child).

- 12.7 Local Plan Policy A2 (N) states that priority will be given to securing new public open space on-site, with provision off-site near to the development only considered acceptable where provision on-site is not achievable. If there is no realistic means of direct provision, the Council may accept a financial contribution in lieu of provision.
- 12.8 Paragraph 6.49 of the Local Plan specifically references the use of financial contributions to create useable spaces such as widening of pavements as it is identified that this can often be a challenge in densely developed areas.

### **Landscaping, Public Realm and Trees - Assessment**

- 12.9 The Application proposes an extension package of public realm works and landscaping provisions which will directly benefit the local area. From the outset, the design team have had strong aspirations to enhance the public realm and improve connectivity in the area.
- 12.10 At street level, the proposed landscaping improvements create safe, useable spaces that links well with the function of the Roundhouse. Public realm improvements will be integral to how people experience the Proposed Development and how the built form and architecture relate to the immediate and wider townscape setting. The landscaping proposals are heritage-led, inspired through the use of paving material and patterns that reference the conservation area. The rain garden planting softens the street-front, provides a buffer to the ground floor windows and maximises the opportunity for SUDS features.
- 12.11 The proposals also include retaining a 'memory' of the boundary wall and considering options for relocating the listed cattle trough, which is presently at risk due to its location immediately adjacent to the highway. Discussions are ongoing with Camden officers and this will be dealt with under the S278 works and a future separate listed building consent application.
- 12.12 The proposed public realm facilitates respite spaces, e.g. the tiered seating, which will support the growth of the Roundhouse as a cultural destination and the development of the

St George youth space. The tiered seating also separates the private landscape on the podium level from the public realm with the use of levels.

- 12.13 The shared outdoor space for residents is divided into 'rooms' with planting for flexible use and varying levels of privacy in the communal garden. A generous swathe of planting along the southern edge of the podium is inspired by nearby Primrose Hill, providing a buffer from the railway, beneficial for both residents and habitat value.
  
- 12.14 A mix of evergreen shrub planting serves as a visual privacy barrier between student and residential outdoor space, and for private accommodation looking onto the podium. The evergreen planting will be punctuated with specimen shrubs and multi-stem trees, herbaceous perennials and a percentage of native species for maximum privacy, visual, qualitative and ecological impact.
  
- 12.15 The Proposed Development provides a high standard of landscape design and incorporates significant levels of urban greening across the site compared to existing. The team has worked hard to optimise the site's potential and provide a significant uplift in public open space noting the closed off and private nature of the site at present. Notwithstanding this, as set out in the DAS, the quantum of public open space being provided on site falls below the guidance set out in Camden's CPG.
  
- 12.16 In this case, meeting the standards is challenging due to the fact that for student accommodation the amount of open space sought is the broadly the same as that for residential accommodation (albeit at a factor of 0.75). It has also been important to activate the ground floor with commercial uses. In this case, unlike many PBSA schemes or indeed town centre residential developments, a significant amount of private resident amenity space is being provided at the rear. This is in addition to private terraces for the new homes and student amenity space at roof level. As such, the pressure on public open space will not be as apparent for this scheme. There are also numerous public open spaces in the area, including Primrose Hill which is only a short walk away. As such, with the scheme providing high quality accessible new public realm for Chalk Farm residents, workers and visitors, there is a significant qualitative provision and the shortfall in the amount of open space is justified.

- 12.17 The Mayor's GLA Population Yield Calculator establishes that the Proposed Development should provide 234 sqm of play space, which the scheme. The landscaping strategy sets out the location of areas on the podium which provides good quality, safe and accessible play provision for under 5's and 5-11 year olds, meeting the 10 sqm per child requirements and exceeding Camden's 6.5sqm requirement. The spaces are integrated into the scheme, with trees and greening, and passive surveillance. For teenagers of 12-15, the provision is less than 40 sqm and the proposals are that they are catered for off-site at nearby open spaces, which will include the adjacent Youth Space in due course.
- 12.18 The play strategy has been developed alongside the sunpath studies through discussions with the daylight and sunlight consultant, with play areas focussed in the areas with greatest sun.
- 12.19 There has also been the need to consider the evacuation strategy for the Roundhouse alongside the design of the public realm and there has been close engagement over these details, which will continue through the design and life of the scheme. There is space in the podium area for Roundhouse patrons should there be an evacuation and an exit is provided through the Proposed Development. The open space at the front of the site will sit comfortably alongside the adjacent fire escape stairs.
- 12.20 The existing site presents as an impenetrable wall to the street. The level differences make it inaccessible. There is no real public realm, active frontage or greening. It is a fairly hostile environment meaning many pedestrians choose to walk on the opposite side of Chalk Farm Road. When the neighbouring Roundhouse has a function on, queuing is along the narrow footway, meaning patrons often stand in the carriageway. The proposals will dramatically improve what the site offers in terms of public realm, place making and its relationship with its neighbours and the street. It will offer residents, works and visitors an attractive, spacious and welcoming environment to move through or to dwell.



## 13 Energy and Sustainability

- 13.1 This section of the Statement assesses the proposed energy and sustainability strategy and its acceptability in planning policy terms.

### Energy Strategy – Policy Context

- 13.2 Section 14 and Paragraph 152 of the NPPF identify the role that planning plays in helping shape places to secure radical reductions in greenhouse emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure.
- 13.3 London Plan Policy SI 2 states that major developments should be net carbon zero with a minimum on-site reduction of at least 35 percent beyond Building Regulations. This means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy:
- Be lean: use less energy and manage demand during operation.
  - Be clean: exploit local energy resources and supply energy efficiently and cleanly.
  - Be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site.
  - Be seen: monitor, verify and report on energy performance.
- 13.4 Policy SI 7 of the London Plan supports the promotion of a more circular economy that improves resource efficiency and innovation to keep products and materials at their highest use for as long as possible and sets a target of 95% of construction and demolition waste and material to be re-used, recycled or recovered. The Mayor has subsequently published London Planning Guidance on Whole Life Carbon Emissions, and Circular Economy.
- 13.5 The WLC Guidance explains that WLC emissions are the total carbon emissions resulting from the construction and use of a building, including its demolition and disposal. They include regulated and unregulated energy use. The Guidance confirms that the net zero-carbon target applies to the “operational emissions” of a building and the WLC requirement is not subject to the Mayor’s net zero-carbon target. Applicants are – as set out in Policy SI2 F -

required to calculate operational and embodied energy and show how both can be reduced. Principle 1 of Table 2.1 of the WLC Guidance advises that **“Retaining existing built structures for reuse and retrofit, in part or as a whole, should be prioritised before considering substantial demolition, as this is typically the lowest-carbon option.”**

- 13.6 Appendix 2 of the WLC provides benchmarks for the whole life carbon performance of buildings. These are based upon the stages of the building’s life cycle as defined in the RICS Guidance excluding modules on operational energy and operational water and impacts beyond the system boundary. This accounts, therefore, for construction, operation and end-of-life. Benchmarks are expressed in terms of kgCO<sub>2</sub>e/m<sup>2</sup> GIA. Additional, aspirational, benchmarks representing a 40% reduction are also provided.
- 13.7 The Mayor’s Circular Economy LPG sets out how the requirements of Policy SI 7 can be met. It **“also includes guidance on how the design of new buildings, and prioritising the reuse and retrofit of existing structures, can promote CE outcomes”** (Paragraph 1.1.3). The LPG indicates a decision tree should be followed to inform the design process for a site, which includes, for existing buildings, considering firstly, whether it is technically feasible to retain the building and, secondly, if the existing building, or parts thereof, would be suited to the requirements of the site.
- 13.8 At a local level, through Local Plan Policy CC1, LBC require all development to minimise the effects of climate change and encourages developments to meet the highest feasible environmental standards that are financially viable during construction and occupation. Moreover, all development is required to reduce carbon dioxide emissions in line with the targets set out within the London Plan.
- 13.9 In support of these objectives, LBC requires the location of development and mix of land uses to minimise the need for car travel, support energy efficiency improvements to existing buildings and the optimisation of energy efficiency.
- 13.10 In January 2021, LBC updated the CPG on Energy Efficiency and Adaptation to help ensure that the Council’s commitment to reducing carbon emissions is achieved.

## Energy Strategy – Assessment

- 13.11 Sustainability has been a key aspect of the Proposed Development from the very early design stages and the form of the PBSA in particular offers an efficient plan with a low form factor compared to alternative configurations of student housing developments. A fabric first approach is being adopted which is achieving ambitious upfront embodied carbon figures. Environmentally sustainable measures have been fully integrated into the design and would be incorporated during the construction and operation of the Proposed Development.
- 13.12 The application is supported by an Energy Statement prepared by Whitecode which provides an assessment against the energy hierarchy set out in London Plan Policy SI 2. The Energy Statement explains the further measures that have been taken to reduce on-site energy use as far as possible. It concludes that the reduction proposed is the maximum reduction technically feasible.
- 13.13 The Proposed Development incorporates Be Lean measures which have resulted in a 12% reduction in domestic carbon emissions and an 11% reduction in non-domestic carbon emissions. This meets the minimum carbon reduction required by the London Plan for residential; however, it has not been possible to achieve the 15% requirement for the non-domestic buildings which is acknowledged by the GLA, due to low carbon heating being included at the baseline.
- 13.14 Developments are also required to adopt sustainable design and construction measures and prioritising decentralised energy (Be Clean). In terms of Be Clean measures proposed, the London Heat Map was initially investigated and reveals that the Site is within a Heat Network Priority Area (HNPA). However, the nearest existing heat network is 760m away. There is provision made in the plant room for a future connection, and a condition to this effect would be welcomed.
- 13.15 Developments are also required to adopt renewables (Be Green). The Be Green results reduce carbon dioxide emissions by 36% compared to baseline. This would exceed the minimum 35% on-site carbon emission reduction required by the GLA. The following (Be Green) renewable technologies have been considered appropriate for the proposal:

- Heat pumps located on the roofs to serve both student and residential accommodation.
  - Photovoltaic (PV) systems on the roof using high performance panels.
- 13.16 The remaining carbon to meet zero carbon will be paid to the offset fund at a total cost of £119,975.
- 13.17 Lastly, developments should take into account how energy performances would be monitored and optimise if possible (Be Seen). The Development will incorporate a detailed metering system to allow monitoring and reporting the annual energy performance of the building as per the GLA's Be Seen Energy Monitoring Guidance.

### **Whole life Carbon**

- 13.18 Furthermore, a Whole Life Cycle Carbon Assessment of the Proposed Development has been undertaken by Whitecode Consulting. The assessment was carried out to evaluate the environmental impact of the proposed development during its life cycle and was undertaken in line with Policy SI 2 of the London Plan. The Whole Life Carbon Assessment demonstrates that the Proposed Development is performing in line with the GLA's expectations when compared to the benchmarks that are set out in the draft Whole Life Carbon Assessment LPG.
- 13.19 A further analysis of the Proposed Development's 'Whole Lifecycle Carbon emissions' would be expected to be carried out at post-construction in line with the GLA's WLC guidance. This assessment should make use of the established bills of quantities and material schedules.
- 13.20 **Overheating**
- 13.21 The report also sets out details of monitoring and other requirements of the Mayor's Energy Assessment Guidance, including details of overheating and cooling. This is noting the orientation of the site, as well as surrounding road, rail and live music venue which mean that ventilation and noise are also important considerations.
- 13.22 The Proposed Development has been assessed using relevant software, indicating that in line with the cooling hierarchy, making use of low g-value glazing, deep reveals and external

shading from fins, balconies and the deck access for the affordable block. There will be instances where windows are unable to open due to acoustic or security reasons and MHVR with tempered air is proposed to mitigate the overheating risk, which is in accordance with the relevant guidance. The common areas have also been assessed with natural ventilation assumed. For the Class E commercial space, cooling has been specified.

- 13.23 The overheating report shows that when including the necessary passive and mechanical updates are included that all the rooms are compliant with the requirements of CIBSE TM59 Criteria and Part O.

### **Sustainability and BREEAM**

- 13.24 The application is supported by a Sustainability Statement prepared by Whitecode Consulting which details the sustainable design features of the Proposed Development and provides a summary of the BREEAM Pre-Assessment and credits which are being targeted. Overall, a BREEAM score of Excellent is currently being targeted.
- 13.25 As set out in the accompanying Retention and Retrofit report, there has been careful consideration about the merits or otherwise of retaining the existing buildings on the site or whether a new build scheme represents a better use of the site and a more sustainable solution in the long time. The Applicant team has been challenged to carefully consider this in light of the climate emergency that Camden (and London faces). The conclusion is that whilst carbon emitted in creating the development and in use is given appropriate focus, wider considerations must be taken into account to assess holistically the environmental price and the resulting benefits of the scheme. Whilst there is carbon demand coming from the Proposed Development, there are clear and measurable benefits arising from the scheme which are dealt with in the various consultant reports.
- 13.26 Furthermore, the Applicant is exploring further opportunities for reductions in embodied carbon which could reduce the embodied emissions further, improving on the aspirational standards which the development already exceeds. This could include using 50% GGBS in the sub-structure and procuring more materials with a certified Environmental Product Declaration to perform better in terms of embodied carbon. Further design work and

structural investigations, which will be undertaken at RIBA 3 and 4, will be necessary to establish the extent to which they are feasible.

### **Circular Economy**

- 13.27 In line with London Plan Policy SI7 and the April 2020 guidance, this application is supported by a Circular Economy Statement which has been prepared by Whitecode Consulting. This sets out the key commitments that the development will implement in order to ensure that circular economy objectives are achieved. The Circular Economy Statement has been developed following a Circular Economy Workshop with various members of the project design team and sets out several outline targets that have been set to address each of the relevant policy requirements and in line with the Mayor's draft guidance. A key element is that circular economy principles are embedded at the start of the project and throughout the full design process to fully realise the benefits
- 13.28 The Circular Economy Statement sets out the circular approach for all stages of the development process, including the existing building (i.e. targets for minimising demolition waste); new development (i.e. targets for minimising excavation and construction waste and designing for future recoverability of building materials) and it then goes on to consider the circular economy for the operational development in use (i.e. targets for minimising municipal waste).
- 13.29 The Circular Economy Statement therefore sets out a clear strategy as to how the Proposed Development will conserve resources, eliminate waste through the design development process and manage waste sustainably at all stages including demolition, excavation, construction and municipal. On that basis, the proposals are considered to comply with the London Plan policy SI7 and accord with the objectives of Local Plan policy CC1.
- 13.30 In conclusion, in accordance with the aspirations of Camden Council and the GLA, the proposals accord with the Mayor's Energy Hierarchy, performing well against the relevant criteria. Whole Life Carbon and Circular Economy considerations have been factored into the scheme development from the outset, resulting in a highly energy efficient and sustainable

development, which comply with all levels of planning policy as well as Building Regulations requirements.

## 14 Transport, Highways and Servicing

- 14.1 This section of the Statement assesses the acceptability of the proposed transport, access, servicing, refuse and trip generation of the Proposed Development in planning policy terms.

### Transport Principles – Policy Context

- 14.2 Chapter 9 of the NPPF outlines aims for a transport system balanced in favour of sustainable transport modes, to give people a real choice about how they travel and encourages solutions which support reductions in greenhouse gas emissions and reduce congestion.
- 14.3 Paragraph 115 of the NPPF is clear that development should only be refused on highways grounds if there would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe.
- 14.4 Paragraph 116 of the NPPF requires development to give priority to pedestrians and cycle movements, address the needs of people with disabilities, create places that are safe, secure and attractive and allow for the efficient delivery of goods and access by service and emergency vehicles.
- 14.5 London Plan Policy T1 states all development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes. The policy further states that development should ensure that any impacts on London's transport networks and supporting infrastructure are mitigated
- 14.6 Local Plan Policy T1 prioritises walking, cycling and public transport in the borough. In pursuance of this LB Camden will seek to ensure developments improve the pedestrian environments by supporting improvements to the pedestrian environment. The delivery of improved walkways, wide pavements and safe and permeable developments is supported.
- 14.7 Policy T1 (h) states that LB Camden will seek to ensure that development provides for accessible, secure cycle parking facilities exceeding minimum standards outlined within the London Plan (Table 6.3) and design requirements outlined within LB Camden's Transport CPG (2021).



- 14.8 LB Camden Local Plan Policy T2 states that the Council will limit the availability of parking and require new development in the borough to be car free.
- 14.9 In January 2021 LB Camden adopted their Transport CPG which provides information on all types of detailed transport issues within the borough.

#### **Transport Principles – Assessment**

- 14.10 The Site has excellent public transport links, with a Public Transport Accessibility Level of 6A. A Transport Assessment prepared by Icen, has been submitted as part of the application. The Transport Assessment assesses the likely transport implications arising from the Proposed Development and sets out the proposed parking, access and servicing arrangements as required by Local Plan Policy T1.
- 14.11 Regarding highways impact, a multi-modal trip generation assessment has been undertaken. The assessment indicates that the Proposed Development is unlikely to generate significant parking pressures due to the car-free nature of the development. Furthermore, it is anticipated that most trips will be made by sustainable modes. The Proposed Development is therefore not anticipated to have a detrimental impact on the local highway network in terms of congestion or road safety.
- 14.12 It is considered that no further public transport impact assessment is required for this Proposed Development, especially given the excellent level of services already available in the local area.

#### **Car and Cycle Parking – Policy**

- 14.13 Policy T6 of the London Plan details the Mayor's approach to the provision of car parking. Part B states that car-free development should be the starting point for all development proposals in places that are (or planned to be) well-connected by public transport.

- 14.14 Policy T5 of the London Plan requires development proposals to provide appropriate levels of cycle parking, which is fit for purpose, secure and well-located. Table 10.2 of the London Plan details minimum cycle parking standards. The minimum requirement for office, student accommodation and residential use is detailed below.

Use	Long-stay requirement	Short-stay requirement
Student Accommodation	0.75 spaces per bedroom	1 space per 40 bedrooms
Offices	1 space per 75sqm (GEA)	1 space per 500 sqm (GEA)
Residential	1 space per studio or 1 person 1 bedroom dwelling  1.5 spaces per 2 person 1 bedroom dwelling  2 spaces per all other dwellings.	5 to 40 dwellings: 2 spaces

Table 6: London Plan Cycle Parking Standards

- 14.15 Camden Local Plan Policy T1 sets out that the Council expect developments to provide, as a minimum, the number of cycle parking spaces as set out in the London Plan. The Camden Transport CPG sets out that the Council will also seek an additional 20% of spaces over and above the London Plan standard to support the expected future growth of cycling.
- 14.16 Regarding car parking, Camden Local Plan Policy T2 sets out that all new non-residential developments (including the re-development and/or conversion of existing sites with new occupiers) are expected to be car-free. This is re-iterated in the Transport CPG.

### Car and Cycle Parking – Assessment

- 14.17 In accordance with London Plan Policy T6 and the Camden Local Plan, the proposed development will be car free, removing the current parking spaces that exist on the site at present. Due to the car-free nature of the Proposed Development, visitors are therefore likely to travel sustainably using the wide range of public transport services available near to the site as well as walking or cycling in accordance with the London Plan, Mayor's Transport Strategy (2018) and the Mayor's Healthy Streets Agenda.

- 14.18 In accordance with London Plan Policy T6, Camden Local Plan Policy T1 and the Camden Transport CPG, the Proposed Development will provide 274 long stay and 30 short-stay cycle parking spaces. The short-stay (visitor) cycle parking is proposed throughout the public realm to the front of the development. This level of provision means that there is an excess of short stay cycle parking to what the London Plan requires (27 spaces) therefore ensuring sufficient space will be available for visitor cycle trips to and from the Proposed Development. The long-stay cycle parking can be broken down as follows:

Use	Long Stay Cycle Spaces
<b>Purpose Built Student Accommodation (PBSA)</b> <b>(sui generis)</b>	208 spaces (158 Tow-Tier, 40 Sheffield and 10 Accessible)
<b>Residential (Class C3)</b>	60 spaces (46 Two-Tier, 10 Sheffield and 4 Accessible).
<b>Class E (potential office)</b>	4 spaces
<b>Class E (potential café)</b>	2 spaces
<b>Total</b>	274 spaces

*Table 7: Proposed long stay cycle parking*

- 14.19 Of these cycle spaces, the majority will be in the form of two-tier racking, but there will also be 20% provided as Sheffield stands, of which 5% will have enlarged spacing around them so that they can accommodate larger cycles.
- 14.20 The cycle parking is also to be split across different locations for the different uses, with a dedicated bike store provided at the ground floor level of the affordable housing block, and then a further cycle store provided at the ground floor level of the student accommodation block, both with separate, dedicated entrance points.

- 14.21 The proposals are in accordance with London Plan (2021) and Local Plan standards for all long stay provision and for short stay provision which is assigned to student accommodation, office and residential use.

#### **Delivery, Servicing, Waste and Refuse – Policy Context**

- 14.22 Part G of London Plan Policy T7 states that development proposals should facilitate safe, clean, and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible.
- 14.23 Local Plan Policy T4 states that the council will promote the sustainable movement of goods and materials and requires developments of over 2,500sqm to minimise the impact of freight movement via road by prioritising the use of the TfL Road network or other major roads, accommodation goods vehicles on-site and providing Construction Management Plans, Delivery and Servicing Management Plans and Transport Assessments where appropriate.
- 14.24 Local Plan Policy CC5 outlines that the Council requires developments to include facilities for the storage and collection of waste and materials.

#### **Delivery, Servicing, Waste and Refuse – Assessment**

- 14.25 The application is supported by a Delivery Servicing Management Plan ('DSMP') prepared by Icen. The DSMP has been prepared in the context of the London Plan and LBC policy. The DSMP will ensure that the likelihood of conflicts with other vehicles and pedestrians will be minimised and that the servicing of the Proposed Development would not affect the free flow or environmental condition of the public highway.
- 14.26 The document details that there is expected to be 13 vehicles daily, setting out a mitigation strategy to encourage deliveries not to overlap where possible, and avoid being undertaken during the peak hours, where possible. The proposals make use of the existing loading bay available on Chalk Farm Road, which provides opportunity for delivery and servicing vehicles to set down within the immediate vicinity of the development.

- 14.27 The Waste Management Strategy for the Proposed Development has been prepared in the context of the LBC Waste Storage and Arrangements for Residential and Commercial Units Guidance Document (2014). The Proposed Development includes separate bin stores for each use, with storage at the basement level for the student accommodation, and at the ground floor of the affordable housing. On collection days, the refuse/recycling will be moved from the respective stores by the on-site team (or individual managers of units as appropriate) to a temporary area on the ground floor level, which ensures it is in a suitable location for collection from Chalk Farm Road from the refuse/recycling vehicle.
- 14.28 The Proposed Development will provide safe and efficient delivery and servicing and has been designed to provide a policy compliant level of waste storage. The Proposed Development is therefore in accordance with London Plan Policy T7 and Camden Local Plan Policy CC5.
- 14.29 A draft Construction Management Plan has been prepared by the Applicant which seeks to:
- Demonstrate how construction impacts will be minimised, both in terms of on site activity and the transport arrangements for vehicles servicing the site.
  - To demonstrate that construction materials can be delivered, and waste removed in a safe, efficient and environmentally friendly way.
  - Consider construction access to site, including safe loading and unloading of materials.
  - Implement a tidy, secure and safe site setup, keep the surrounding roads clean and safe during the construction process.
  - Consider, mitigate and reduce nuisances such as noise, dust and vibration for surrounding neighbours arising from the construction process.
  - To comply with requirements of UK environmental, health and safety policies.

- 14.30 The CMP will be a live document that will evolve as the design and development progresses. Section 106 obligations in relation to demolition and construction management bonds and formation of a construction working group are also anticipated.

## 15 Other Environmental and Technical Considerations

15.1 This section of the Statement assesses the Proposed Development against amenity considerations comprising the following:

- Daylight and sunlight (including Solar Glare);
- Noise and Vibration;
- Agent of Change Principles;
- Air Quality;
- Basements
- Fire Safety;
- Flood Risk and Drainage;
- Ground Contamination;
- Archaeology;
- Ecology and Biodiversity;
- Wind Microclimate and Thermal Comfort;
- Health Impact.

### **Daylight and Sunlight (including Solar Glare) – Policy Context**

15.2 At the national level, the Building Research Establishment ('BRE') Report 'Site Layout Planning for Daylight and Sunlight 2022' comprises tests to assess the impact that a new development will have on the light to neighbouring properties. The tests within the document are given as advice and are not mandatory. As such they are not planning policy.

15.3 The examples given with the BRE guide can generally be applied to any part of the UK, from urban to rural locations. The BRE Guidelines specify that the daylight and sunlight results be considered flexibly and in the context of the Site. Clearly there would be a higher expectation for daylight and sunlight in a rural or suburban environment than in a dense city centre location. Therefore, the guide needs to be applied sensibly when assessing daylight and sunlight to allow for a more practical approach to central London urban design.

- 15.4 The BRE Report advises that daylight and sunlight levels should be assessed for the main habitable rooms of neighbouring residential properties. Habitable rooms in residential properties are defined as kitchens, living rooms and dining rooms.
- 15.5 Vertical Sky Component ('VSC') analyses the daylight provided at the centre of a window and is the most commonly used daylight testing method. The BRE guidance considers that if a development would lead to a neighbouring window having less than 80% of its former value then it may be adversely affected.
- 15.6 The daylight distribution method assesses the change in position of the No Sky Line ('NSL') between the existing and proposed situations.
- 15.7 The Annual Probable Sunlight Hours ('APSH') method is used to test the impact that a development would have on sunlight levels at existing southern facing residential windows. The BRE guidance recommends that the APSH received at a given window should be at least 25% of the total available, including 5% in winter.
- 15.8 London Plan Policy D6 states the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing, and maximising the usability of outside amenity space.
- 15.9 Policy A1 of the Local Plan sets out how the Council will manage the impact of development to protect the quality of life of occupiers and neighbours. The policy states that planning permission will be granted unless it causes unacceptable harm to residential amenity. To protect residential amenity, the Council will consider a variety of factors including sunlight, daylight and overshadowing.
- 15.10 Paragraph 6.5 of the Local Plan states that:

**"Loss of daylight and sunlight can be caused if spaces are overshadowed by development. To assess whether acceptable levels of daylight and sunlight are available to habitable, outdoor amenity and open spaces, the Council will take into account the most recent guidance published by the Building Research Establishment (currently the Building**



**Research Establishment’s Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice 2011). Further detail can be found within our supplementary planning document Camden Planning Guidance on amenity.”**

### **Daylight and Sunlight – Assessment**

- 15.11 A Daylight and Sunlight report has been prepared by Consil which has been submitted as part of the planning application. The daylight and sunlight analysis has been considered by reference to the criteria and methodology within the Building Research Establishment Guidelines (2022), which when published, recognised that it should not form a mandatory set of criteria, rather it should be used to help and inform design.
- 15.12 The assessment has considered the effect of the Development together with the cumulative effect should the neighbouring Juniper Building come forward in its approved form. The following properties were assessed to analyse the effect of the Development on neighbouring sites:
- Juniper Crescent Estate;
  - The Chalk House;
  - 71 Chalk Farm Road;
  - 67-70 Chalk Farm Road;
  - 65-66 Chalk Farm Road;
  - The Juniper Building.
- 15.13 The assessment confirms that the Proposed Development would have an acceptable impact on daylight and sunlight amenity to the neighbouring residential properties, drawing the following conclusions:
- All the neighbouring properties would retain VSC figures in the mid-teens or higher, levels which have been considered acceptable elsewhere in the borough notably by recent appeal decisions.
  - The PFS and eastern part of the Site are largely undeveloped, leading to uncharacteristic levels of daylight in the current conditions and contributing to greater proportional changes.

- The design is a key factor in the reductions in daylight to the windows and rooms facing the Site. Supplementary analysis shows that it is the presence of balconies and the brise soleil that are the main factors in the loss of daylight, rather than the Development.
- The cumulative scenario with the Juniper Building would cause some additional reductions in daylight. Nonetheless, for the same reasons as set out above, the retained levels of daylight and sunlight amenity can be considered acceptable.

15.14 A detailed analysis of the proposed Youth Space has been undertaken, given its proposed use for active play. As noted, the Youth Space is being brought forward in association with the adjacent PFS site and it is important to note the sequence of this in relation to previous development proposals for the Application Site. Of note, is that the Youth Space was approved with development proposals coming forward on the Application Site in a similar layout which would cause a certain level of overshadowing to it.

15.15 The design team has therefore been careful to ensure that the Proposed Development, particularly the affordable housing block, does not cause any undue overshadowing impact to the Youth Space. As set out in the Consil report, the Proposed Development shows only a marginal (1%) difference in the amount of sunlight that would reach the Youth Space as a result of the Proposed Development alongside the PFS development.

15.16 Overall, the Proposed Development would have an acceptable effect on daylight and sunlight amenity to the neighbouring residential properties in accordance with the NPPF, Local Plan policies and the BRE guidance.

#### Solar Glare

15.17 Consil have also prepared a Solar Glare Report, in line with the guidance provided by the BRE, to analyse the potential for disabling glare to train drivers due to the Development which is located adjacent to the Primrose Hill Junction to Camden Road West Junction branch line. It is intended that the building will be clad using terracotta with fins to help mitigate solar glare from the windows. It is also anticipated that the cladding will have a matte finish which will mitigate the risk of disabling glare occurring.

- 15.18 Overall, the Solar Glare Report concludes that the potential risk associated with reflected glare is low. The design of the proposed buildings and façade materiality have been carefully considered to mitigate any potential glare.

### **Noise and Vibration**

- 15.19 Paragraph 174 of the NPPF requires planning decisions to prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of, among other things, noise.
- 15.20 London Plan Policy D14 details the ways in which development proposals should manage noise. The list includes avoiding significant adverse noise impacts, mitigating and minimising the existing and potential adverse impacts of noise without placing unreasonable restrictions on existing noise-generating uses, improving and enhancing the acoustic environment and separating new noise-sensitive development from major noise sources using distance, screening, layout, orientation, uses and materials. Where it is not possible to achieve separation of noise-sensitive development and noise sources, Policy D14 allows for any potential adverse effects to be controlled and mitigated through applying good acoustic design principles.
- 15.21 At a local level, Camden Local Plan Policy A1 seeks to manage the impact of adverse effects from noise and vibration. Policy A4 of the Local Plan sets out that noise and vibration in developments will be managed, and planning permission will only be granted for noise generating equipment (including plant and machinery) if it can be operated without causing harm to amenity. Detailed standards are set out in Appendix 3 of the Local Plan.
- 15.22 The Application is supported by a Noise Assessment prepared by Sandy Brown Consultants. In accordance with LB Camden guidance, maximum noise level limits have been set for building services plant which are predicted to result in a noise rating level which is at least 10 dB below the typical background sound level. Based on the requirements of LBC and on the results of the noise survey, all plant must be designed such that the cumulative noise level at 1 m from the worst affected windows of the nearby noise sensitive premises does not exceed:

To the north:

- LAeq,15min 41 dB during the day,
- LAeq,15min 43 dB during the evening
- LAeq,15min 34 dB at night

To the south:

- LAeq,15min 38 dB during the day
- LAeq,15min 34 dB at night.

- 15.23 Operational noise limits have been set for egress to surrounding sensitive receptors. These are not expected to be overly restrictive on typical uses of the commercial spaces.
- 15.24 An assessment of internal noise levels during overheating conditions has been carried out noting the proximity to the railway, road and also the Roundhouse. Enhanced mechanical ventilation will be required throughout the development to address background and overheating condition however, openable windows will still be provided.
- 15.25 Tactile vibration is not expected to be an issue at this Site. Vertical vibration causing re-radiated noise is predicted to exceed the recommended re-radiated noise criterion of LASmax 35 dB by up to 1 dB on Level 1, though these levels are still below the London Underground Limited complaint threshold of LAmx 40 dB.
- 15.26 Overall, it is concluded that the Proposed Development will protect neighbouring amenity and ensure satisfactory acoustic amenity for future residents and is therefore in compliance with Policies D13 and D14 of the London Plan and Policies A1 and A4 of the Camden Local Plan.

### **Agent of Change Principles**

- 15.27 Policy D13 of the London Plan refers to the Agent of Change principle, placing the responsibility for mitigating the impact of noise and other nuisances firmly on the new development. This is reinforced in Policy A4 of the Local Plan which sets out that in cases where noise sensitive development is proposed in close proximity to an existing noise

generating use (such as music venues and pubs) the Council will determine whether the introduction of the sensitive use will be harmful to the existing premises continued operation.

- 15.28 In this instance, the design evolution has carefully considered the relationship with the Roundhouse, an important live music venue. Whilst noise and disturbance generated by live music venues can be challenging in terms of traditional residential accommodation, this is generally not the case for more transient, younger residents within student accommodation.
- 15.29 As noted above the noise study has specifically considered the adjacency of Roundhouse, which was surveyed during performance times, where no music noise was observed at the measurement points. Notwithstanding this, a number of mitigation measures have been incorporated in the Proposed Development, including locating the affordable housing on the eastern edge of the site, furthest away from the Roundhouse boundary.
- 15.30 Robust glazing and façade treatment, and provision of mechanical ventilation as noted above, will also be incorporated into the Proposed Development to ensure residents are buffered from any potential noise emanating from the Roundhouse. With these measures in place, the uses will be able to successfully co-exist.

### **Air Quality**

- 15.31 Paragraph 174 of the NPPF states that development should not contribute to or be put at unacceptable risk of, or be adversely affected by unacceptable levels of pollution, including air pollution.
- 15.32 London Plan Policy SI 1 requires that development proposals to not lead to further deterioration of existing poor air quality, create any new areas that exceed air quality limits and create unacceptable risk of high levels of exposure to poor air quality. To meet these requirements, development proposals must be at least Air Quality Neutral and design solutions should be used to prevent or minimise increased exposure to existing air pollution.
- 15.33 Camden Local Plan Policy CC4 seeks to ensure that the impact of development on air quality is mitigated and that exposure to poor air quality is reduced in the borough.

- 15.34 The Air Quality CPG was published by LBC in January 2021 and states that Camden is a designated Air Quality Management Area due to the high concentrations of nitrogen dioxide (NO<sub>2</sub>) and particulate matter (PM<sub>10</sub>). As such, all developments are to limit their impact on local air quality. An Air Quality Assessment is required to support any scheme which proposes uses susceptible to poor air quality, such as housing.
- 15.35 The application is supported by an Air Quality Assessment as prepared by AQ Consultants. The Assessment has been undertaken to quantify the potential impacts on local air quality associated with both the construction and operation of the Proposed Development.
- 15.36 The Proposed Development lies within a borough-wide Air Quality Management Area (AQMA) declared by LBC for exceedances of the annual mean nitrogen dioxide (NO<sub>2</sub>) and 24-hour mean PM<sub>10</sub> objectives. It is also within 200 m of one of the Greater London Authority's (GLA's) air quality Focus Areas; these are locations with high levels of human exposure where the annual mean limit value for NO<sub>2</sub> is exceeded.
- 15.37 The report concludes the following:
- The Proposed Development does not increase exposure to poor air quality.
  - Mitigation measures will be in place during construction works to avoid creating dust.
  - As the development is car free and does not include any on-site combustion plant for the routine provision of energy, the proposed development complies with the requirement that all new developments in London should be at least air quality neutral.
  - Air quality conditions for future residents and users of the proposed development, taking account of emissions from the local road network and nearby railway emissions, have been shown to be acceptable, with concentrations well below the air quality objectives for NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> and below the Air Quality CPG criteria for NO<sub>2</sub> and PM<sub>10</sub>.
- 15.38 The Assessment ultimately concludes that air quality would not pose a constraint to the redevelopment of the Site. The Proposed Development is therefore considered to be

acceptable in terms of effects upon air quality in accordance with Policy SI 1 of the London Plan and Camden Local Plan Policy CC4.

## Basements

15.39 Camden Local Plan Policy A5 states that the Council will only permit basement development where it is demonstrated to its satisfaction that the proposal would not cause harm to:

- a) neighbouring properties;
- b) the structural, ground, or water conditions of the area;
- c) the character and amenity of the area;
- d) the architectural character of the building; and
- e) the significance of heritage assets.

15.40 Camden Basements CPG gives detailed guidance with respect to new basement development, specifically their siting, location, scale and design.

15.41 A Basement Impact Assessment, prepared by Pell Frischmann, has been submitted to support this application. The Basement Impact Assessment has assessed the proposed development and concluded the following:

- There would not be a risk or stability impact to the development and/or adjacent sites due to slopes.
- The proposed basement induces some ground movements which requires monitoring of the neighbouring structures.
- There is a low risk of groundwater flooding. However, the basement walls shall be designed and constructed to be impermeable to remove the risk from seasonal perched ground water.
- There are no impacts to the wider hydrogeological environment.
- There is a low risk of surface water/sewer flooding.

15.42 The Basement Impact Assessment was submitted as a pre-application draft for independent review by the Council's preferred auditor, Campbell Reith. Through early engagement with

Campbell Reith, there has been thorough assessment of the impacts of the proposed basement works to ensure that the Proposed Development accords with Local Plan Policy A5.

### **Fire Safety**

- 15.43 London Plan Policy D5 states development proposal should achieve the highest standards of accessible and inclusive design. They should be designed to incorporate safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building.
- 15.44 London Plan Policy D12 promotes the highest standards of fire safety for all developments. The policy requires development to, *inter alia*, be designed to incorporate appropriate features which reduce risks from fire, constructed in a way to minimise the spread of fire and provide suitable means for escape. All major development proposals should be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party, suitably qualified assessor. The policy sets out that fire safety of developments should be considered from the outset. Development agreements, development briefs and procurement processes should be explicit about incorporating and requiring the highest standards of fire safety. Further detail is set out in the Fire Safety LPG.
- 15.45 The application is supported by a Fire Statement as prepared by Ashton Fire who are suitably qualified and competent professionals with demonstrable experience to address the complexity of the design being proposed. The report defines the fire safety objectives and performance requirements of the Proposed Development, and the methods by which these objectives will be achieved. The document has been prepared in the context of London Plan Policies D5 and D12 and relevant Building Regulations.
- 15.46 The fire safety of the development has been an important consideration from the outset of the project. The proposed buildings have been designed to ensure that appropriate provisions for the early warning of fire and appropriate means of escape in case of fire are in place. Both the PBSA building and the C3 affordable housing block have at least two escape stairs at each level. Two firefighting shafts are provided in the PBSA building, with one



firefighting shaft within the residential building. The proposal includes automatic suppression, which will be provided at the above-ground levels by a BS 9251 sprinkler system.

- 15.47 The report sets out commitments in terms minimum Building Regulation guidance documents for materials, along with details of the evacuation strategy, alarms, and passive fire safety measures. The report also considers future proofing and how records will be kept through the design and construction phases. It is noted that whilst HSE has been consulted, comments had not been received at the time of writing. Notwithstanding, any comments received, will be taking into consideration as the next stage of design progresses and as such a suitably worded condition would be welcomed.
- 15.48 Another important consideration which has been central to the design process has been the escape strategy for the Roundhouse, noting that one of its fire escapes exits at the rear of the Site. There are also a set of escape stairs immediately adjacent to the western boundary, where the new public space is proposed.
- 15.49 The fire consultant has carefully considered provision of means of escape from the Roundhouse exits in the event of full evacuation of a capacity crowd from the venue which has informed the design of the Proposed Development. The podium and exit stairs as designed are sufficient if there were a need to evacuate the Roundhouse via the Proposed Development. This is detailed further in the DAS and Fire Statement.

### **Flood Risk and Drainage**

- 15.50 Paragraph 167 of the NPPF states that when determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment.
- 15.51 Paragraph 169 of the NPPF states that major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate.
- 15.52 Policy SI 12 of the London Plan requires developments to ensure that flood risk is minimised and mitigated, and that residual risk is addressed. Policy SI 13 of the London Plan details that

development proposals should aim to achieve greenfield run-off rates and that there should be a preference for green over grey features in line with the drainage hierarchy.

- 15.53 At a local level, Policy CC3 of the Local Plan seeks to reduce flood risk and maximise water efficiency through the use of Sustainable urban Drainage Systems (SuDS) to achieve greenfield runoff rates where feasible. Additionally, LB Camden Planning Guidance 'Water and Flooding' (March 2019) gives further guidance in respect of the water environment, water efficiency and flooding in Camden.
  
- 15.54 The application is supported by a Flood Risk and Drainage Assessment (FRA), prepared by Pells Frischmann. The assessment notes that the Site is within Flood Zone 1 and is at a low risk of flooding from all sources including fluvial and tidal sources and surface water.
  
- 15.55 Recommendations are made in respect of appropriate consideration of finished floor levels and external level design to manage the residual risk of overland flows by conveying water away from dwellings and towards positively drained areas.
  
- 15.56 The FRA concludes that development could proceed without being subject to significant flood risk and complies within relevant local plan policies. Furthermore, the development will not result in increased flood risk to third parties if there is suitable management of surface water runoff.
  
- 15.57 Regarding drainage, a Sustainable Drainage Report has been prepared by Pells Frischmann. The assessment details how the surface water drainage strategy has been prepared in accordance with regard to the drainage hierarchy detailed in London Plan Policy SI 13 including the incorporate of SuDS.
  
- 15.58 In summary, the Proposed Development will incorporate rainwater harvesting, blue roofs, green roofs, rain gardens, pervious pavements, bioretention systems and attenuation storage tanks into the drainage strategy for the Site. The surface water management plan (document ref: 106885-PEF-ZZ-XX-DR-CD-0500) details the extent of the SUDS features.

- 15.59 The Proposed Development is therefore considered to accord with Paragraphs 167 and 169 of the NPPF, London Plan Policies SI 12 and SI 13 of the London Plan, Camden Local Plan Policy CC3 and the aspirations of the Water and Flooding CPG.

### **Ground contamination**

- 15.60 Policy A1 of the Camden Local Plan stipulates that the Council will seek to protect the quality of life of occupiers and neighbours. The factors the Council will consider include [inter alia] contaminated land.
- 15.61 The application is supported by a Land Contamination Desk Study prepared by Pell Frischmann. The report identifies potential land contamination risks and Geoenvironmental constraints which could impact upon the proposed redevelopment of the site.
- 15.62 The demolition and excavation works will result in the removal of all Made Ground below the development, and the Proposed Development is to predominantly comprise hardstanding with limited areas of suspended podium soft landscaping. As such, any potential contaminant source and exposure to future users will be eliminated and the report concludes that end user land contamination risks are considered to be low.
- 15.63 As such, further investigation and assessment of land contamination risks is not considered to be required for future site users or controlled waters at the site. Mitigation will be appropriate in relation to the construction process, which can be managed by way of condition

### **Archaeology**

- 15.64 At a national level, Paragraph 189-208 of the NPPF (2021) sets out guidance to conserve and enhance the historic environment.
- 15.65 Policy HC1 (Heritage conservation and growth) of the London Plan states that development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable,

development should make provision for the protection of significant archaeological assets and landscapes.

- 15.66 Camden Local Plan Policy D2 states that the Council will protect remains of archaeological importance by ensuring acceptable measures are taken proportionate to the significance of the heritage asset to preserve them and their setting, including physical preservation, where appropriate.
- 15.67 A supporting Archaeological Desk-based Assessment, prepared by MOLA, has been submitted as part of the Planning Application. The site is in Tier 2 Regents Canal and Rail Infrastructure Archaeological Priority Area, covering areas of historic transport interchanges and industrial development that grew up beside the Regents Canal. This desk-based study assesses the impact of the scheme on archaeological remains (buried heritage assets). There has been no previous archaeological investigation on the Site.
- 15.68 The potential for earlier remains is low. The location of the Site on heavy soils on the London Clay would have made it unattractive for early settlement and farming, and there is little known evidence of activity pre-dating the post-medieval period in the vicinity of the Site. The main archaeological potential for the site is for features relating to its railway heritage. These may include truncated footings of the mid-19th century viaduct, and footings of buildings associated with The Roundhouse. There is a limited potential for the site to contain remains of the footings of earlier houses beneath the thick made ground.
- 15.69 The main impacts from the proposed development would be initial ground reduction to the proposed ground floor level, excavation for the basement, and insertion of piled foundations in areas not affected by the basement, removing all remains within the areas of impact.
- 15.70 Appropriate care will need to be taken to avoid physical damage during demolition and all construction phases to the Grade II\* listed Roundhouse, and the Grade II listed drinking trough on Chalk Farm Road which can be dealt with by relevant conditions.

## Urban Greening and Ecology

- 15.71 NPPF Chapter 15 seeks to conserve and enhance the natural environment. Paragraph 180 is clear that proposals should support conservation and enhancement of biodiversity, whilst encouraging opportunities to incorporate biodiversity improvements in and around developments, where this can secure measurable net gains for biodiversity.
- 15.72 London Plan Policy G5 states major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping, green roofs, green walls and nature-based sustainable drainage.
- 15.73 Part B of Policy G5 sets out that boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The Mayor recommends a target score of 0.3 for predominately commercial development.
- 15.74 Policy A3 of the Camden Local Plan sets out that the Council will, *inter alia*, safeguard protected and priority habitats and species, assess developments against their ability to realise benefits from biodiversity proportionate to the scale of development proposed and expect developments to incorporate additional trees and vegetation wherever possible.
- 15.75 The application is supported by an Urban Greening Factor Assessment as prepared by BBUK. The scheme seeks to maximise the opportunity for greening on-site whilst also recognising the town centre setting and Roundhouse adjacency in terms of providing robust public realm. At 0.33, the Proposed Development achieves a slight shortfall against the suggested target of 0.4 for residential developments as set out in the London Plan.
- 15.76 Every effort has been made to maximise green infrastructure interventions on site as far as feasible. Furthermore, whilst the urban greening factor assessment does not involve a comparison with pre-development conditions, the Proposed Development represents a significant improvement over the existing quantum of greening on-site. The Applicant is committed to reviewing other opportunities to increase this through vertical greening around plant enclosures, for instance.

- 15.77 The application is also supported by a Biodiversity Impact Assessment ('BIA'), as prepared by Ecology by Design and Ecological Impact Assessment. The Proposed Development stands to result in a net gain of +0.37 biodiversity units associated with area-based habitats compared with the pre-development value. This equates to a total net increase of 237.12% in ecological value, which is well above the 10% target set out in the Environmental Act (2021).
- 15.78 Enhancement features such as bird boxes, bat boxes and insect boxes are not considered within the biodiversity metric calculation but will be incorporated within the site to further enhance the site for wildlife, as detailed within the Ecological Impact Assessment
- 15.79 To conclude, the Proposed Development has maximised the opportunity for urban greening and biodiverse enhancements on-site and represents a significant improvement over the existing situation in accordance with London Plan Policy G5 and Policy A3 of the Camden Local Plan.

#### **Wind Microclimate and Thermal Comfort**

- 15.80 London Plan Policy D8 (G) requires development proposals to ensure that buildings are of a design that activates and defines the public realm and provides natural surveillance. Consideration should also be given to the local microclimate created by buildings, and the impact of service entrances and facades on the public realm.
- 15.81 Part (J) continues to note that development proposals should ensure that, "appropriate shade, shelter, seating and, where possible, areas of direct sunlight are provided, with other microclimatic considerations, including temperature and wind, taken into account in order to encourage people to spend time in a place".
- 15.82 Policy D9 (Tall Buildings) of the London Plan states that "wind, daylight, sunlight penetration and temperature conditions around the building(s) and neighbourhood must be carefully considered and not compromise comfort and the enjoyment of open spaces, including water spaces, around the building.
- 15.83 Paragraph 6.24 of the Camden Local Plan (2017) states that:

**“Large developments can alter the local climate. Buildings can affect the flow of air and cause wind tunnels which can potentially affect the enjoyment of public spaces... Developments should therefore consider local topography and the local microclimate in their design.”**

- 15.84 Section 7 of the ‘Amenity’ Camden Planning Guidance Document (2021) sets out the Council’s expectations regarding wind impact assessments, in terms of the qualitative and quantitative analyses.
- 15.85 The submitted Report prepared by GIA sets out the wind microclimate conditions on and around the site, with regards to both wind safety and the suitability for intended pedestrian uses and compares conditions with and without the proposed development to assess the impact of the proposed development on the local wind microclimate.
- 15.86 As set out within the accompanying report, the findings demonstrate that there are no wind safety risks associated with the proposed development at either ground level or elevated levels and in fact would result in a beneficial impact on both the future Youth Space and existing outdoor seating on the opposite side of Chalk Farm Road.
- 15.87 Wind comfort conditions will be suitable for the intended use for all thoroughfares, existing building entrances, proposed building entrances, bus stops, existing amenity spaces, proposed amenity at ground floor or podium level and proposed amenity terraces.

### **Health Impact Assessment**

- 15.88 London Plan Policy GG3 states that development must assess the potential impacts of development proposals on the mental and physical health and wellbeing of communities to mitigate any potential negative impacts, maximise positive impacts and help reduce health inequalities through the use of Health Impact Assessments (HIA). Policy C1 of the Local Plan requires proposals for major developments to include an HIA.
- 15.89 The application is supported by a Health Impact Assessment prepared by Volterra. as is promoted Policy GG3 of the London Plan. The assessment was undertaken to assess the

potential effect of the Proposed Development on the surrounding area as well as the health impacts expected for future residents and considered the following:

- Housing quality and design
- Access to healthcare services and other social infrastructure
- Access to open space and nature
- Air quality, noise, and neighbourhood amenities
- Accessibility and active travel
- Crime reduction and community safety
- Access to healthy food
- Access to work and training
- Social cohesion and neighbourhoods
- Minimising the use of resources
- Climate change

15.90 The categories were assessed for specific criteria outlined in the Methodology section of the report, with any potentially negative impacts including recommendations and mitigation methods. Overall, the report concludes that the Proposed Development is expected to have positive health outcomes for the area and wider borough, particularly in terms of the provision of much needed inclusive public realm for Camden Town Centre and activating this stretch of the high street.

15.91 Whilst the Proposed Development would place some additional demand on local healthcare facilities, this is unlikely to be significant given the nature of the Proposed Development predominantly as a student scheme. The proposal therefore accords with Policy GG3 of the London Plan and Local Plan Policy C1.



## 16 Section 106 Obligations, CIL and Planning Conditions

- 16.1 Under Section 106 of the Town and Country Planning Act 1990 (as amended) local planning authorities have the power to enter into planning obligations with the Applicant and any persons with an interest in the land to be developed as a means of mitigating any impacts of a development proposal.
- 16.2 In accordance with Regulation 122(2) of the CIL Regulations (as amended), and paragraph 57 of the NPPF, planning obligations should only be sought where they meet all the following tests:
- Necessary to make the development acceptable in planning terms;
  - Directly related to the development; and
  - Fairly and reasonably related in scale and kind to the development.
- 16.3 Paragraph 55 of the NPPF supports that planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.
- 16.4 Policy DF1 of the London Plan 'Delivering of the Plan and Planning Obligations' states that when setting planning obligations in Local Development Plan Documents, and in situations where it has been demonstrated that planning obligations cannot viably be supported by a specific development, applicants and decision-makers should first apply priority to affordable housing and necessary public transport improvements, and following this health and infrastructure, affordable workspace, culture and leisure facilities, in delivering good growth.
- 16.5 Local Plan Policy DM1 states that the Council will use planning obligations, and other suitable mechanisms, where appropriate, to support sustainable development; secure any necessary and related infrastructure, facilities and services to meet the needs generated by development, and to mitigate the impact of development.
- 16.6 The CPG sets out how the Council will use Section 106 Contributions and CIL to fund infrastructure in the Borough. It states that planning obligations may be sought in respect of affordable housing, open space, and infrastructure to address the site specific and related impacts of development which may include financial, and non-financial contributions.

Detailed guidance for calculating specific financial obligations is set out within the relevant CPGs.

### **Community Infrastructure Levy**

- 16.7 On 6 April 2010, the Community Infrastructure Levy Regulations 2010 came into force to fund the provision, improvement, replacement or maintenance of infrastructure required to support development, as set out within each Local Authority's Regulation 123 list (a 'living' document which provides a summary of the infrastructure which CIL receipts should fund).
- 16.8 In London, CIL is charged at both a regional level, by the Mayor, as well as at a local level, by LBC. In terms of Mayoral CIL, the revised Charging Schedule referred to as MCIL2 is now used and given that this Site is within the Band 1 and Central London charging zones, it is payable at the following rates:
- Offices - £80 per sqm GIA (plus indexation);
  - Student Accommodation - £80 per sqm GIA (plus indexation);
  - Residential - £80 per sqm GIA (plus indexation).
- 16.9 Camden adopted its revised CIL charging schedule on 30 October 2020. This Site is within Zone B (Rest of Camden), where development is charged at the following rates:
- Office, Research and Development - £32 per sqm GIA (plus indexation);
  - Student Accommodation - £515 per sqm GIA (plus indexation);
  - Residential (more than 10 dwellings) - £322 per sqm GIA (plus indexation).
- 16.10 A CIL Form has been submitted with this application.

### **Draft Heads of Terms**

- 16.11 The Applicant anticipates entering into a legal agreement with LBC to secure the reasonable and necessary planning obligations associated with the Proposed Development in accordance with Regulation 122 of the CIL Regulations and LBC's Developer Contributions CPG.

16.12 It is envisaged that during the planning application determination period the Applicant will discuss an appropriate package of Section 106 contributions with Officers.

16.13 In terms of the Proposed Development, the potential Section 106 heads of terms are listed below to form the basis for discussions:

- Affordable Housing; 35% through a blended approach;
- Apprenticeships and work placement opportunities;
- BREEAM Excellent;
- Carbon offsetting contribution of £119,975;
- Car-free development;
- Demolition and Construction Management Plans;
- Construction Management Plan Monitoring Fee;
- Demolition and Construction Management Plan Implementation Support Contribution and necessary bonds;
- Delivery and Servicing Management Plan;
- Employment and Training Strategy;
- Employment and Training Contribution;
- Energy Efficiency and Renewable Energy Plan;
- Highways contribution;
- Local procurement and recruitment;
- Pedestrian, Cycling and Environmental Improvement Contribution;
- Public Open Space Contribution;
- Service Management Plan;
- Student Housing: management, eligibility;
- Sustainability Plan;
- Travel Plan.

### **Planning Conditions**

16.14 Paragraph 56 of the NPPF states that planning conditions should only be imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects. It goes on to set out the pre-commencement

conditions should be avoided unless there is clear justification. It is envisaged that potential planning conditions will be agreed with Officers during the determination period.

## 17 Summary and Conclusions

- 17.1 Section 38(6) of the Town and Country Planning Act 1990 requires applications for planning permission to be determined in accordance with the statutory development plan unless material considerations indicate otherwise.
  
- 17.2 Section 66 of the Planning (Listed Buildings and Conservation Area) Act 1990 also requires local planning authorities to have special regard to the desirability of preserving the setting of listed buildings in the exercise of all planning functions.
  
- 17.3 Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out that local planning authorities should pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas when considering applications.
  
- 17.4 This Statement has provided a comprehensive review and analysis of national, regional, local and neighbourhood planning policy and guidance which applies to the Proposed Development. It sets out the planning case for the scheme, having full regard to Development Plan policies and other material considerations and should be read in conjunction with the other supporting documents submitted in support of the Application.
  
- 17.5 The Proposed Development is in accordance with the Statutory Development Plan, when read as a whole and on this basis planning permission should be granted without delay. In addition, the strong material considerations pertinent to this Application also indicate that planning permission should be granted.
  
- 17.6 The development potential of the Site in terms of land use, layout, public realm and height, bulk and mass has been thoroughly considered and optimised. The Proposed Development has been designed to respond positively to the character of the surrounding townscape in terms of disposition of massing, material palette and architectural articulation. The proposals constitute buildings of high-architectural quality to transform the Site that otherwise detracts from the townscape and this part of the Regent's Canal Conservation Area.
  
- 17.7 Notwithstanding the heritage, townscape and visual benefits, the application proposals will, through realising positive transformation change to the Site, cause some minor, less than

substantial harm to heritage significance of Regent's Canal Conservation Area and grade II\* listed Roundhouse. The scheme will however, deliver numerous public benefits as follows:

#### **Land use and economy**

- 17.8 The unlocking of an important allocated site within the Camden Goods Yard ('CGY') area, a part of the borough identified as having the potential to create a new dynamic and animated mixed-use neighbourhood, for existing and new communities to enjoy as a place to live, work and visit.
- 17.9 The site which is currently vacant and underutilised fails to engage with the street and has no reference to its surrounding context. The proposed development would open up the site on to the street, providing level access and new publicly accessible space, thereby contributing towards the activation of the town centre and Chalk Farm Road and towards the Council's wider placemaking objectives for the area. Critically, it would make optimal use of this highly accessible brownfield site.
- 17.10 Provision of a high-quality purpose-built student accommodation development with a proportion of affordable student rooms which will help contribute towards an unmet demand for this type of housing in the borough. In total, the scheme will bring forward 165% of Camden's annual PBSA bedspace target and will also help limit additional pressure on the wider private rented market.
- 17.11 Alongside the student housing, delivery of 24 high-quality on-site affordable homes in a purpose-built block, of which a quarter will be 3-bed homes, to meet a defined need for new social rented family homes in the borough.
- 17.12 Provision of commercial uses that contribute to the vitality and vibrancy of the high street and Camden Town Centre through the activation of the ground floor plane and provision of level, step-free thresholds.
- 17.13 The provision of modern, flexible, and adaptable ground floor commercial units that are adaptable to varying and changing business needs, such as SME workspace.

- 17.14 Creation of significant local employment opportunities, estimated at 210 construction jobs and up to 80 full time jobs in the operational phase alongside a commitment to employment and training initiatives during build out and on occupation.
- 17.15 Additional household spending on goods and services to the order of £3 million per year, a significant proportion of which would be spent locally.

### **Townscape and design**

- 17.16 A scheme which better celebrates the role and respects the setting of the adjacent Roundhouse (Grade II\* Listed), responding to the wider industrial heritage of the area and high street location through its design, whilst resonating with local townscape character, the wider setting of the conservation area and other nearby heritage assets.
- 17.17 The provision of new high quality, accessible public realm designed by local landscape architects BBUK, which will enhance permeability and accessibility to the adjacent Roundhouse, complementing its function as a world-renowned entertainment venue.
- 17.18 A significant uplift in amenity space for local residents, workers and visitors, comprising two generous and fully inclusive public spaces fronting Chalk Farm Road. The site is currently closed off and inaccessible.
- 17.19 The provision of public realm which takes its cue from the local heritage context, including the 'Camden Wall' and features such as the Grade II Listed 'Former Cattle Drinking Trough' and railway vernacular.
- 17.20 Investment in the Grade II Listed 'Former Cattle Drinking Trough' which is currently on Historic England's at Risk Register, prolonging its life and giving it a vital new purpose by way of being incorporating into the landscaping proposals as part of the associated S278 works and a future separate listed building consent application
- 17.21 High quality building design having regard to all aspects of relevant planning policy including layout, appearance, height, residential standards, fire safety and security.

- 17.22 Enhanced safety and reduced opportunity for crime through creating spaces that benefit from overlooking as natural surveillance.
- 17.23 A scheme with 'Agent of Change' principles at the forefront of the design process to ensure that the new residential buildings can sit comfortably alongside the Roundhouse and the railway line.

### **Environmental**

- 17.24 A sustainable, inclusive, and energy-efficient place, achieved through a comprehensive approach to reducing energy use and carbon emissions including the use of renewable and low-carbon technology. Whole life carbon and circular economy principles are at the core of the proposals, and commitments will be made to reusing or recycling material where possible.
- 17.25 A car-free scheme that will include the provision of high-quality cycle commuter facilities to encourage sustainable transport options such as cycling and walking to reduce pollution from transport. Transport mitigation measures will ensure that the adjacent street network and public transport infrastructure will not be adversely impacted and where possible, improved.
- 17.26 The existing building is poorly performing environmentally, and the site contains a significant amount of hardstanding. The proposed development will result in significant improvements in terms of urban greening and biodiversity compared to the existing arrangements, with planting (including the introduction of new trees), soft landscaping and improvements to the railway viaduct wall proposed, alongside the use of a blue roof system on the podium.
- 17.27 BREEAM 'Excellent' to be achieved with provision of energy efficient light fittings, controls and metering, low water use and rainwater harvesting.

### **Social Value**

- 17.28 The proposed development will contribute to key social value outcomes including creating jobs for local people, supporting the local economy, providing new homes and places of work,



and providing new public realm to contribute to the environmental and physical wellbeing of local people.

- 17.29 Regal London is exploring opportunities for the proposed development to create social value through collaboration with local organisations. Thus far, an official partnership with the Roundhouse Trust has been announced. The partnership will focus on enhancing the opportunities given to young people who take part in Roundhouse programmes through engagement with the Regal London team across all departments. As the Proposed Development moves forward in development, build out and occupation stages, these relationships will be forged and strengthened.
- 17.30 The Applicant is also to take on a custodianship role in relation to the proposed Youth Space. There has been ongoing dialogue with the developers of the adjacent site, which includes bringing forward a new area of open space for the young people of Camden. With two frontages to this space, the Applicant committed to ensuring that this is a successful community asset in the future.
- 17.31 Cumulatively, the public benefits associated with the Proposed Development are material and compelling. They will lead to significant positive change to Chalk Farm Road and this part of Camden, in line with the objectives of planning, and wider public policy.
- 17.32 These public benefits are concluded to decisively outweigh any limited, less than substantial heritage harm in accordance with the NPPF. The Application accords with national, regional and local policy objectives to deliver sustainable, mixed-use and balanced communities and should therefore be approved.

