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FAO: Kristina Smith

Our ref: NFR/SAWE/EMOU/TSM/U0020547

Your ref: 2024/0479/P

29th May 2024

Dear Kristina

100 Chalk Farm Road
Application for Full Planning Permission and Listed Building Consent
Town and Country Planning Act (1990)
Planning (Listed Buildings and Conservation Areas) Act 1990

We write on behalf of Regal Chalk Farm Limited ('the Applicant') in relation to the pending planning application (Ref: 2024/0479/P) and associated listed building consent application (Ref 2024/0539/L) for 100 Chalk Farm Road ('the Site').

As a result of the consultation process and on-going dialogue with planning and design officers at the London Borough of Camden ('LBC'), a series of amendments have been made to the planning application by the Applicant, which are supported by updated plans and documents for formal substitution in then enclosed pack.

Matters for Substitution

The documents submitted for substitution represent amendments which are considered appropriate to respond to comments raised by consultees during the statutory consultation period. In addition to responding to consultee comments, the opportunity has also been taken to improve and enhance the proposed development.

In summary, the proposed changes to the scheme comprise:

- Extending the affordable housing building to the eastern boundary line;
- Adding a new lightweight 'crown' to the affordable housing building;
- Increasing the number of affordable homes being brought forward from 24 to 30;
- Ground floor enhancements to the entrance of the affordable housing building;
- Internal reconfiguration of the basement to the PBSA building including the location of plant;
- Plan layout amendments to the PBSA building to provide improved amenity of residents; and
- Design improvements and enhancements to the façade of the PBSA building.

The proposed changes to the scheme do not alter the description of development. A schedule of the physical changes to the proposed development is set out in the Design and Access Statement (DAS) Addendum, prepared by DSDHA.

This letter provides a summary of the proposed changes to the application to be read alongside the DAS Addendum. Where planning considerations have changed as a result of the changes, this letter provides an update to the Planning Statement prepared by Gerald Eve LLP as part of the original submission.

Substitution Documents

The documents submitted for formal substitution or as addendum to those previously submitted are:

Updated Documents (to supersede February 2024 Submission Version)

- Community Infrastructure Levy Additional Information Form, prepared by Gerald Eve LLP;
- Proposed Drawings, prepared by DSDHA;
- Drawing Schedule, prepared by DSDHA;
- Circular Economy Statement, prepared by Whitecode;
- Whole Life Carbon Assessment, prepared by Whitecode.
- Energy Statement, prepared by Whitecode;
- Sustainability Statement, prepared by Whitecode;
- Overheating Assessment, prepared by Whitecode;
- Structural Engineering Report, prepared by Pell Frischmann;
- Wind Microclimate Assessment Report, prepared by GIA.

Supplementary Documents (to be read alongside February 2024 Submission Version)

- Daylight and Sunlight correspondence, prepared by Consil;
- Design and Access Statement Addendum (including updated area schedules), prepared by DSDHA;
 - Includes Updated Landscape Chapter, prepared by BBUK;
- Transportation Technical Note, prepared by Icen;
- Heritage, Townscape, Visual Statement (HTVS) – Addendum Note – Minor Revisions, prepared by Turley; and
- Response to LB Camden Energy and Sustainability Comments, prepared by Whitecode.

Application documentation originally submitted in support of the application which is not referenced above is not subject to change as a result of the proposed scheme amendments.

Summary of Consultee Responses and Public Comments

Appendix A of this letter comprises a tracker which has been prepared to summarise the matters raised by statutory consultees and the public through the consultation process and how these are addressed or have been responded to by the Applicant.

Planning Considerations

As a result of the amendments, a robust review of the original submission reports has been undertaken in order to confirm that the conclusions reached remain valid. The key areas of review are as follows:

- Land Use Matters
- Design and Massing
- Townscape and Heritage
- Daylight and Sunlight
- Transport and Highways
- Energy and Sustainability

Each matter is considered in turn below.

Land Use Matters

The changes to the plans proposed under the May 2024 substitution pack will amend the land use provision as follows:

Land Use	Existing Floorspace (GIA)	February 2024 Submission		May 2024 Substitution	
		Proposed Floorspace (GIA)	Net Change from Existing (GIA)	Proposed Floorspace (GIA)	Net Change from Existing (GIA)
Commercial (Use Class E)	3,433 sqm	824 sqm	-2,650 sqm	1,089 sqm	-2,344 sqm
Purpose Built Student Accommodation (Sui Generis)	0 sqm	9,474 sqm	+9,474 sqm	8,858 sqm	+8,858 sqm
Affordable Residential (Use Class C3)	0 sqm	2,765 sqm	+2,765 sqm	3,505 sqm	+3,505 sqm
Total Floorspace	3,433sqm	13,063sqm	+ 9,630 sqm	13,452 sqm	+10,019 sqm

The broad distribution of uses brought forward under the May 2024 substitution remains consistent with that proposed under the February 2024 submission. The proposed development will continue to optimise the use of the Site to provide accommodation for purpose built student accommodation as well as much needed affordable homes, complementary town centre uses, and new public realm. The conclusions reached in Section 8 (Planning Principles) of the submitted Town Planning Statement, dated February 2024 remain valid.

Changes to C3 Affordable Housing Provision

As a result of extending the affordable housing building to the eastern boundary line and adding a new residential unit at level 10, it has been possible to optimise unit layouts whilst also increasing the quantum of affordable homes being brought forward. The revised proposal now includes the provision of 30 affordable homes (Use Class C3), an increase of 6 homes to that previously proposed. The table below details the originally proposed quantum of homes and mix, and the revised quantum of homes and mix.

Changes to the quantum, tenure and mix of the affordable housing provision are as follows:

February 2024 Submission			May 2024 Substitution	
<u>Tenure Split</u> Social Rent: 13 units (54% of units) Intermediate Rent: 11 units (46% of units)			<u>Tenure Split</u> Social Rent: 18 units (60% of units) Intermediate Rent: 12 units (40% of units)	
Unit Size	No. Units / %	Wheelchair User Units - M4(3)	No. Units / %	Wheelchair User Units - M4(3)
1B/2P	6 / 25%	0	4 / 13%	0
2B/4P	12 / 50%	1	13 / 43%	6
3B/5P	6 / 25%	2	8 / 27%	0
4B/5P	0 / 0%	0	5 / 16%	0
Total	24	3	30	6

The proposed amendments continue to deliver a range of unit sizes and types whilst delivering an increased number of affordable homes, including larger family sized units. A key benefit of the revised scheme is a 25% increase in the delivery of affordable homes, as is the introduction of 4B/5P home to the scheme and the provision of an additional seven larger sized family homes, for which there is a identified need in the Borough.

As with the February 2024 proposal, 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.

The conclusions of Section 9 (Student and Affordable Housing) of the submitted Town Planning Statement, dated February 2024 as they relate to the C3 affordable housing offer including in terms of housing mix and residential quality remain valid.

Changes to Purpose Built Student Accommodation

Over the course of the consultation period, there has been a review of the student building in consultation with LBC officers. This has resulted in the layout of rooms in the two larger cylindrical buildings being rotated in order to give better window locations in the facade to the rooms located at the centre of the plan, where the three cylinders are joined.

These changes to the window locations result in improvements in terms of outlook and view, and privacy for future occupants. Large studios have been moved to the centre of the plan, which can better accommodate windows that allow for long views. The large studios and DDA rooms at the centre of the plan that have two windows allow for additional daylighting with the option of one window being obscured for privacy. The DDA rooms have been re-distributed across the buildings. This offers greater choice in terms of orientation and room layout, and responds to feedback received during the consultation process.

The changes to the plans proposed under the May 2024 substitution will amend the provision of PBSA rooms as follows:

PBSA Room Types	February 2024 Submission	May 2024 Amendments/ Variance
	No. of Rooms	No. of Rooms
Cluster	42	24 (-18 rooms)
Studio	155	171 (+16 rooms)
Large Studio (inc. 10% DDA Accessible)	68	69 (+1 room)
Total	265	264 (-1 room)

The changes to the plan layouts of the PBSA buildings represent a betterment over the previous proposal in terms of enhancing amenity and promoting a greater choice of DDA units in particular.

There has also been an amendment to the room type within the PBSA building as a result of the increase in conventional C3 affordable housing (discussed below), resulting in the reallocation of some cluster rooms as studio rooms.

The design changes are minor in the context of the overall scheme and the conclusions of Section 9 (Student and Affordable Housing) of the submitted Town Planning Statement, dated February 2024 as they relate to the PBSA offer, including in terms of mix and amenity.

Affordable Offer and Fast Track Route

Paragraph 24 of the GLA Stage 1 Response (dated 05th April 2024) confirmed that GLA officers accept the hybrid approach to affordable accommodation in this instance:

“Whilst not strictly compliant with London Plan Policy H15, GLA officers accept the hybrid approach to affordable housing in this instance. Engagement has taken place with Council officers regarding the inclusion of this accommodation in response to local housing considerations and need. GLA officers were supportive of the principles of the inclusion of on-site conventional affordable housing during pre-application discussions.”

Paragraph 25 goes onto state that GLA officers consider the level of affordable accommodation (35% based on NIA along with habitable rooms) ‘could follow the Fast Track Route’.

The approach to the affordable offer being brought forward under the amendments remains consistent with that proposed in the February 2024 submission (i.e the information assessed in the GLA Stage 1 Report).

The Applicant is proposing to meet its affordable housing obligations by bringing forward the 30 conventional C3 affordable homes alongside a proportion of affordable student accommodation (ASA) to reach the equivalent London Plan Fast Track threshold of 35%.

The proposed affordable C3 housing equates to circa 28% of the scheme based on floorspace (GIA) and habitable rooms in line with London Plan and Camden Council requirements. Alongside this, the 24 cluster rooms 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). The amended scheme

has reduced the number of cluster rooms from 42 to 24 rooms, prioritising the provision of conventional C3 affordable housing, as sought by Camden Council.

As such, whilst the blend of affordable C3 and affordable student has altered slightly as a result of the amendments, the overall level of affordable housing being proposed accords with the threshold level in the London Plan. Accordingly, there still remains no requirement to submit detailed financial viability information (a financial viability appraisal) with this application and there is still no requirement for a late-stage review being attached to any planning permission.

Design and Massing

In response to on-going dialogue with planning and design officers at LBC, the design and appearance of the proposed development has evolved. A summary of the enhancements is provided below, and further detail is provided in the Design and Access Statement Addendum which forms part of this re-submission. This includes updated verified views.

Key amendments to the PBSA buildings comprise façade enhancements including altered terracotta header panels to the windows, and revisions to the brick plinth/bases to the drums/cylinders to incorporate corbelled brick head detailing around their perimeter. The massing and form of the building is not subject to change.

Key amendments to the affordable housing building include:

- Extending the building to the site's eastern flank wall toward the boundary of the adjacent petrol filling station site;
- The provision of an additional residential unit at level 10, largely contained within the volume that was previously proposed as a plant enclosure;
- The provision of a new lightweight 'crown' at roof level above the new residential unit, to align the building with the PBSA buildings and to contain the revised roof level plant and lift overrun;
- A redesign of balustrades and gates at ground floor level to enhance the relationship with the future 'Youth Space' expected to be delivered under the neighbouring petrol filling station site.

As a result of enhancements at roof level (namely the revised lift overrun and provision of a lightweight 'crown'), the height of the affordable housing building is subject to a minor increase of 2.03m (from 62.580m to 64.610m).

The proposed development continues to provide an inherently sustainable development of high architectural quality that is fitting to this high street and town centre location. The conclusions of Section 8 (Planning Principles) of the submitted Town Planning Statement, dated February 2024 remain valid.

Heritage and Townscape

A 'Heritage, Townscape and Visual Statement Addendum Note' has been prepared by Turley which assesses the heritage impact of the proposed revisions, the townscape impact of the proposed revisions (based on remodelled verified views) and provides a response to stakeholder comments as they relate to the heritage impacts of the proposals.

In terms of impact upon heritage significance and setting, the following conclusions are made:

“The evolution of well-considered design and detailing will further enhance the overall design and visual qualities of the proposal, whilst increasing the number of affordable housing units. Insofar as the proposed revisions affect the external form and appearance of the application proposals, the overall impact on heritage significance and setting and townscape and visual context, will to a degree, be further improved.”

In terms of visual impact, Turley identify the minor lift overrun and new ‘crown’ to not be apparent within the overall massing of the proposals within the majority of the views, and note there to be ‘no perceptible change to the impact on LVMF View 2A.2’. In terms of closer views it is acknowledged that the new ‘crown’ is “visible as an additional lightweight structure against the sky, matching the crowns to the cylinders that form the student housing building”.

The HTVS Addendum Note concludes as follows:

“The revised design, clarification on materials and amended detailing of the buildings further strengthens their relationship one to another and to their wider heritage and townscape contexts, whilst allowing for an important and beneficial increase in the number of affordable housing units provided on the site”

The conclusions of Section 11 (Heritage, Visual Impact and Townscape) of the submitted Town Planning Statement, dated February 2024 therefore remain valid.

Landscape, Play Space and Urban Greening

An updated Landscape chapter prepared by BBUK forms part of the DAS Addendum. This includes a revised play space assessment alongside an updated urban greening factor assessment to reflect amendments to the proposed development.

The play space calculation for the proposed development has been re-calculated based on the revised development and to align with the formula set out in the Public Open Space Camden Planning Guidance document (2021). This generates a total requirement of 223sqm of which 90sqm is to be allocated to the under 5 age group, 81 sqm to 5 – 11-year-olds and 52 sqm to 12 – 15-year-olds. The play space for the 0-4 and 5-11 age group is provided on-site to the south-west of the affordable housing building. Teenagers of 12-15 are catered for off-site at nearby open spaces, which will include the adjacent Youth Space in due course.

In terms of urban greening, the revised proposal results in an increase in Urban Greening Factor score from 0.33 to 0.34.

Daylight and Sunlight

The changes to the scheme have been reviewed in terms of the effect they may have on daylight and sunlight amenity compared to the submitted scheme. Accordingly, the re-submission is supported by correspondence from Consil which considers the potential effect on the neighbouring properties and the adequacy of light within the proposed development.

In terms of impact on neighbouring properties, Consil draw the following conclusions:

“Whilst the affordable housing building has shifted approximately one metre towards the eastern boundary line and the lift overrun has been extended, the size of the building is materially unchanged. In

our opinion, these minor changes would not materially affect the daylight and sunlight results set out in our daylight and sunlight report, nor would it alter our conclusions.”

In terms of the adequacy of light within the proposed affordable housing building, Consil draw the following conclusions:

“Turning to the light received to the habitable rooms within the affordable housing building, having reviewed the proposed amendments, our opinion is that the levels of light will be very similar to that for the submitted scheme. All main living rooms from the second floor up are expected to meet or exceed the recommended minimum levels set out in the BRE guidelines, as was the case for the submitted scheme. This includes the additional unit at roof level, which would receive high levels of daylight and sunlight amenity.

In terms of the adequacy of light within the proposed PBSA buildings, Consil draw the following conclusion:

“In respect of the student accommodation building, the minor internal alterations to the wheelchair accessible units and amendments to the façade would not materially change the daylight and sunlight analysis results and our conclusions would remain the same.”

The correspondence ultimately concludes that the proposed amendments will not materially alter the potential for daylight and sunlight to be enjoyed by future occupiers and that the conclusions set out in the previous Daylight and Sunlight Report remain valid.

Wind and Microclimate Assessment

An updated Wind and Microclimate Assessment Report is submitted in response to the minor revisions to the footprint and height of the affordable housing building. The proposed amendments are considered in Section 2.6 of the report. GIA conclude that the changes do not substantially change the overall external building envelope so would not have a material impact on the expected impact of the development on wind conditions on and around the site.

As such, GIA confirm that the conclusions of the earlier Wind and Microclimate Assessment remain valid. Namely, that there are no wind safety risks associated with the proposed development at either ground level or elevated levels and that 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 spaces at ground floor or podium level and proposed amenity terraces.

Transport and Highways

The ‘Transport Technical Note’ which forms part of this re-submission provides a response to consultee comments provided to date from LBC Highways and Transport for London on the application, alongside an assessment of the impacts of the revised proposal in transport terms (including in terms of cycle parking provision and trip generation).

Of note is the commensurate increase in residential cycle parking to align with the increase in number of homes. In total the number of residential cycle parking spaces has increased from 60 spaces to 78 spaces.

The Transport Technical Note draws the following conclusions:

“In summary, the previously established conclusions of the Transport Assessment submitted as part of the current application remain valid, in that the Proposed Development satisfied the criteria of NPPF and local / regional policy and as such there is no justifiable reasons to object to the application on highways and transportation grounds”.

The conclusions of Section 14 (Transport, Highways and Servicing) of the submitted Town Planning Statement, dated February 2024 therefore remain valid.

Energy and Sustainability

In response to consultee comments received from LB Camden and the GLA and as a result of amendments to the scheme, a comprehensive review of the submission documents has been undertaken with updates having been made to the Circular Economy Statement, Whole Life Carbon Assessment, Energy Statement, Sustainability Statement and Overheating Assessment.

The updated documents form part of this submission pack alongside the ‘Response to LB Camden Energy and Sustainability Comments’ correspondence prepared by Whitecode which details how the reports have been updated in response to comments received.

A response to the GLA comments will be issued under separate cover.

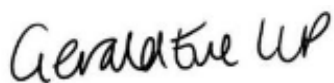
Fire Safety

As a result of the amendments to the layouts, the fire consultant has reviewed the scheme and an updated Fire Statement and Gateway 1 form have been prepared and will be provided imminently under separate cover.

Next Steps

We look forward to receiving confirmation of receipt of the substitution documents, alongside confirmation of the commencement of the re-consultation period. In the meantime, please contact Nia Fraser (+44 795 769 1616) or Samantha Wells (+44 782 462 6388) of this office should you have any questions.

Yours faithfully,



Gerald Eve LLP



Appendix A

100 Chalk Farm Road – Stakeholder and Consultee Responses (May 2024)

1. This document is intended to summarise consultation responses to the planning proposals (reference: 2024/0479/P) at 100 Chalk Farm Road (London Borough of Camden).

Consultee	Date Received	Summary of Camden Comments	Design Team Response
Statutory			
London Borough of Camden			
Affordable Housing Officer	06/03/2024	<ul style="list-style-type: none"> Is the tenure of the individual units shown anywhere? Clarification on wheelchair affordable unit proposals. Plan 356_P20.167 – AH floor plan levels 7 & 8 shows the middle flat Flat 06_14 – presumably this is supposed to be Flat 07_14. 	<p>DSDHA updated the DAS, accommodation schedule and floor plan to clarify the queries.</p> <p>Shared with LBC on 21/03/24 under separate cover. No further feedback/ responses received from LBC Officer on the plans as submitted. It is noted that amended plans have been produced which increases the number of affordable homes and a subsequent change to tender. There are also updates to layouts and some of the wheelchair</p>



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			homes have been revised to address design officer comments..
Transport	25/03/2024	<p>Camden officers have assessed the transport statement and conclude that the proposals are generally acceptable in terms of transport implications subject to further queries and a series of conditions and planning obligations being secured by legal agreement.</p> <p>Clarification has been sought as to why taxi trips were not included in the mode share calculations.</p> <p>Considering that no vehicles would likely need to enter the site, it is suggested that the existing crossover is removed, and the footway reinstated to enhance the pedestrian and cycling environment. The second crossover would also not be required.</p> <p>The applicant is requested to consult ‘Statutory guidance on Fire safety Requirement B5: Access and facilities for the fire service’, to demonstrate how the development can be safely attended to in emergency, without the requirement for the crossovers.</p>	<p>Comments noted. Response to be issued under separate cover.</p> <p>Conditions and S106 obligations agreed in principle, details of which will be the subject of further discussion with the case officer.</p>
Air Quality	24/04/2024	The applicant should specifically list which life safety functions the generator will be used to power.	Response to be issued under separate cover.



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		<p>The location and flue height of the generator should be clearly shown on sections and diagrams of the site – Applicant has indicated flue will terminate 3m above Block B, show this on a diagram/section.</p> <p>Conditions relating to mechanical ventilation, construction related impacts – monitoring and mitigation, and non-road mobile machinery have been proposed.</p>	<p>Suitably worded condition agreed in principle subject to further discussions in respect of appropriate triggers and mechanisms.</p>
Energy and Sustainability	26/03/2024	<p><u>Energy</u></p> <ul style="list-style-type: none"> • Overall carbon reduction of 36% does not meet the requirement for net zero carbon and therefore a carbon offset payment of £119,975 is required (42.1 tonnes £95 per tonne for 30 years) – secure through s106. • The carbon reduction of 11% at Be Lean for the non-domestic space falls below the requirement of 15%, options to increase reductions at Be Lean should be explored. • The carbon reduction of 5% at Be Green for the non-domestic space falls below the requirement of 20%, options to increase reductions at Be Green should be explored. • EUI benchmarks have been exceeded across the development, the applicant should investigate options to further reduce EUI on site. 	<p>A comprehensive response provided by Whitecode as part of the addendum pack. This pack includes response tables to address LBC and GLA queries and updates the reports to reflect the amendments being made to the application.</p> <p>Updated Energy, WLC, CE and Sustainability reports produced to address the amendments and comments received.</p> <p>Suitably worded condition agreed in principle subject to further</p>



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		<ul style="list-style-type: none"> Solar panels are proposed at roof level with a total array size of around 30.4kWp maximised across viable roof space, this should be conditioned. 	discussions in respect of appropriate triggers and mechanisms.
Sustainability		<ul style="list-style-type: none"> Active cooling is proposed due to acoustic constraints at the site which limit the use of openable windows, leading to overheating in many areas. Active cooling is proposed in the form of MVHR with tempered air cooling - Could the applicant please further define what is meant by tempered air cooling - i.e. is this partial cooling to bring the temperature down a few degrees rather than a fully operable AC system? The retail units do not meet the policy requirement of achieving 60% of water credits. Further water credits should be secured. 	<p>See response from Whitecode – MHVR is proposed not active cooling.</p> <p>See Whitecode response confirming anomalies regarding simulated energy end use and estimates.</p>
Circular Economy		<ul style="list-style-type: none"> Report acceptable -a detailed audit of the materials onsite and how these can be reused or recycled is set out. Suggested conditions set out. 	Suitably worded condition agreed in principle subject to further discussions in respect of appropriate triggers and mechanisms.



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Whole Life Carbon		<ul style="list-style-type: none"> Barriers to meeting the Aspirational Benchmarks for each stage should be fully explained and measures to further decrease WLC impact should be considered. Once the above is resolved post construction reporting of WLC targets will be conditioned. 	<p>See response from Whitecode - the WLC carbon report has been updated to include further opportunities to reduce embodied carbon.</p> <p>Suitably worded condition agreed in principle subject to further discussions in respect of appropriate triggers and mechanisms.</p>
Green Infrastructure		<p>The development includes areas of biodiverse green roof - it is encouraged that roof areas should investigate combined blue/green roofs with solar PV appropriately spaced over the top to maximise biodiversity, attenuation and carbon reduction benefits. Clear roof plans showing what is proposed and a cross section of the roof build-up should be submitted so we can understand proposed substrate depth and attenuation potential at roof level.</p>	<p>A response to this item will be provided under separate cover.</p>
Mayoral Organisation			



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Greater London Authority Stage I Report	05/04/2024	See Stage I GLA Report.	A detailed response to matters raised by the GLA is being provided under separate cover.
LBC Third Party Technical Reviews			
Campbell Reith	First round of comments received 12/03/2024. Second round of comments received 03/04/2024	Comprehensive review of the BIA has been carried out on behalf of LBC with a report and audit checklist provided to team for response. Details of Appendix K“Wallap Output – Preliminary” requested together with further details on the excavation and retaining wall, including figures showing the depth and location of the proposed excavation including the temporary slopes.	Pell Frischmann undertook a review and provided a response on 26 th March including an update of the BIA inc App C sketches and App 2 table submitted 22/03/24 Response and sketch sent to Camden on 08/04/2024. No further comments received.
Other			
Historic England	04/03/2024	Historic England provided detailed comments about the proposal, raising some concerns regarding the application on heritage grounds albeit support is offered for the principle of development and that it shows some promise to positively manage and mitigate some impacts through the design responding	Comments noted. The team has been working with Camden Council to refine the design proposals, which is reflected in the



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(Listed Buildings /Conservation Areas)		<p>to local character. They do consider that harm will be caused to the significance of the Roundhouse and the CA, but note that this could be reduced through further design amendments.</p> <p>Given the complexity of the surrounding topography, the irregularity of form of the significant historic buildings and their rich interrelationships, the specific impacts of the proposed development in townscape views need to be considered dynamically. They recommend that the effect of the proposals on these views from within the historic railway yards should be examined, alongside significant views connected with the other historic buildings linked with the Roundhouse in the wider area.</p> <p>Historic England would be happy to engage in discussions regarding the future of the trough, including repair and relocation.</p>	<p>amendment pack that has been submitted.</p> <p>A detailed response to other points raised by HE has been provided within the Heritage, Townscape and Visual Statement Addendum prepared by Turley.</p> <p>The team would welcome engagement with HE over a future Listed Building Consent and s278 application in relation to the listed cattle drinking trough.</p>
Historic England (Archaeology) (GLAAS)	05/03/2024	<p>Recommend a condition as follows:</p> <p>No demolition or development shall take place until a written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, which shall include the statement of significance and research objectives, and</p>	<p>Suitably worded condition agreed in principle subject to further discussions in respect of appropriate triggers and mechanisms.</p>



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		<p>A. The programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works</p> <p>B. Where appropriate, details of a programme for delivering related positive public benefits</p> <p>C. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI</p>	
Thames Water	22/02/2024	<p><u>Waste Comments</u></p> <p>Thames Water requests a condition:</p> <p>“No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling</p>	<p>Comments noted.</p> <p>Suitably worded condition agreed in principle subject to further discussions in respect of appropriate triggers and mechanisms.</p>



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	<p>must be undertaken in accordance with the terms of the approved piling method statement.”</p> <p><u>Water Comments</u></p> <p>Thames Water request that the following conditions be added to any planning permission.</p> <p>“No development shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional demand to serve the development have been completed; or - a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan. Reason - The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development”.</p> <p>“No construction shall take place within 5m of the water main. Information detailing how the developer intends to divert the asset / align the development, so as to prevent the potential for damage to subsurface potable water infrastructure, must be submitted to and approved in writing</p>	
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		<p>by the local planning authority in consultation with Thames Water. Any construction must be undertaken in accordance with the terms of the approved information. Unrestricted access must be available at all times for the maintenance and repair of the asset during and after the construction works.”</p> <p>“No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.”</p>	
Health and Safety Executive (HSE)	12/03/2024	<p>HSE welcomes the provision of access to at least two stairs in each building.</p> <p>Following a review of the information provided in the planning application, HSE is content with the fire safety design as set out in the project description, to the extent it affects land use planning considerations. However, HSE has identified some matters as supplementary information, set out below, that the applicant should try to address, in advance of later regulatory stages.</p>	Comments noted. Ashton Fire have confirmed no further action/response is required at the planning stage and more detailed matters will be addressed at the next design stage (Building Regulations).



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	<p>Section 7 of the fire statement states: “The upper floors of the eastern drum of the Student Accommodation building are supported by two common stairs, though at Level 06 the secondary escape stair will have onward escape via a transfer to the separate compartment of the western drum via the external terrace area. To facilitate both day-to-day circulation but to also provide suitable separation of the escape routes in a fire, a 120 minute rated fire-and-smoke curtain will be provided at Level 06 in support of this transfer. Firefighting would be required to take a longer hose-laying path while the curtain is closed, but this would remain within the limits recommended within BS 9991.”</p> <p>This is noted and it will be for the applicant to demonstrate compliance at later regulatory stages.</p> <p>The basement floor plan appears to show a connection from the ‘Commercial Unit’ to the residential stairs. The cited fire safety standard states that all stairs serving dwellings, which are not ancillary to the main use of the building, should not communicate with any other occupancy in that building.</p> <p>However, it is noted that the London Fire Statement (Figure 1 – page 8) does not show this arrangement. Accordingly, the ‘Commercial Unit’ should not connect with the residential stairs. In this instance the removal of the</p>	
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		connection should not affect land use planning considerations. However, if the removal of the connection between commercial and residential areas affects travel distances and a separate basement stair(s) is required this then may affect land use planning considerations. It will be for the applicant to demonstrate compliance at later regulatory stages.	
Lead Local Flood Authority (LLFA)	First comments received 06/03/2024. Second comments received 16/04/2024	<p><u>Recommendation and Requests</u></p> <p>We require more information and improved proposals before recommending approval of the application for the following reasons:</p> <ol style="list-style-type: none"> 1. The applicant has not included rainwater harvesting measures such as water butts within the drainage strategy. 2. Clarity is required on the design on the blue roof, which is stated as being located “underneath the permeable paving”. 3. The applicant has not included drawings showing the locations of the proposed rain gardens, tree pits, and rainwater harvesting features (if included following feasibility review). 4. The applicant has not demonstrated that the minimum 150mm substrate for storage has been provided within the blue roofs and green roofs. 	Detailed response (including updates to the FRA and Drainage Report) provided by Pell Frischmann and issued via email on 24/05/2024.



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		<ul style="list-style-type: none">5. The applicant has provided greenfield runoff rates for 1 in 1-, 30-, and 100-year events that vary between the main report, the greenfield runoff calculations, and the SuDS Proforma.6. The applicant has not provided calculations to support the existing runoff rate values given.7. The applicant has not demonstrated that the proposed runoff rates are below the greenfield runoff rates.8. The applicant has not provided the existing runoff volume for the site (1 in 100 yr 6 hr).9. The applicant has provided conflicting information regarding the total attenuation volume provided by the proposed SuDS features.10. The applicant has not provided calculations for the 1 in 30 yr event.11. The applicant has not submitted drawings showing anticipated overland exceedance flows.12. The applicant has not confirmed the named maintenance owner for the proposed drainage system.	
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		<p>13. The applicant has not provided evidence that Thames Water have confirmed sufficient sewer capacity.</p> <p>14. The applicant has not confirmed that the proposed basement will not increase groundwater flood risk to the local area or be at risk of groundwater flooding, and that flood protection measures have been included within the basement due to its location along a previously flooded street.</p> <p>15. The applicant has not provided information detailing the management of Health and Safety risks related to the SuDS design.</p> <p>16. The applicant has not provided a Flood Risk Emergency Plan.</p> <p>To address the above, please can the applicant submit information which:</p> <ol style="list-style-type: none">1. Demonstrates the inclusion of rainwater harvesting measures such as water butts within the drainage strategy unless technical justification can be provided for their non-inclusion.2. Confirms details of the proposed blue roof, currently shown as being located “underneath the permeable paving”.3. Shows the locations of the proposed rain gardens, tree pits, and rainwater harvesting features.	
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		<ol style="list-style-type: none">4. Demonstrates that the minimum 150mm substrate for storage has been provided within the blue roofs and green roofs.5. Confirms the greenfield runoff rates for 1 in 1, 30, and 100 year events, and ensures these are consistent between the report and calculations provided.6. Shows calculations to support the existing runoff rate values given.7. The applicant should examine the opportunity to propose one discharge point, and provide justification for its feasibility, which would allow for a lower runoff rate.8. Demonstrates the existing runoff volume for the site (1 in 100 yr 6 hr).9. Confirms the total attenuation volume from all proposed SuDS features.10. Shows calculations for the 1 in 30 yr event to demonstrate there will be no flooding on site.11. Shows the anticipated overland exceedance flows.12. Clarifies the named maintenance owner for the proposed drainage system.	
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		<p>13. Demonstrates evidence that Thames Water have confirmed sufficient sewer capacity.</p> <p>14. Provides detail to demonstrate that the proposed basement will not increase groundwater flood risk to the local area or be at risk of groundwater flooding, and that flood protection measures have been included within the basement.</p> <p>15. Demonstrates information detailing the management of Health and Safety risks related to the SuDS design.</p> <p>16. Demonstrates the inclusion of a Flood Risk Emergency Plan.</p>	
General Public (Key Themes)			
<p>25 objections received and 4 comments in support (as at 21/05/2024). Having reviewed the responses received to date, the following themes have been observed in relation to the objections with a response provided on each theme below:</p> <ul style="list-style-type: none"> • Height/scale/massing: concern about the proposed massing (12 storeys) being out of keeping with the local area and the potential impact on local views; • Privacy: impact on neighbouring privacy and potential overlooking; • Daylight/Sunlight: impact on the sunlight and daylight of the surrounding properties and failure to meet BRE Criteria; • Student Use: demonstration of demand for student accommodation in Camden, management measures of the student accommodation; 			



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- **Loss of employment:** exceptional circumstances have not been demonstrated;
- **Heritage:** the impact on the Grade II* listed Roundhouse and the Regent’s Canal Conservation Area;
- **Noise:** impact of noise and vibration during construction;
- **Affordable Housing:** the quantum of affordable housing being provided on site being too low.

Height	<p>Applicant Response: 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 office floors. These provide a backdrop for the Proposed Development.</p> <p>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. Most notably arising from discussions with Camden Officers and other stakeholders is the arrangement of the drums on the site, with the taller elements to the rear of the site and then stepping down towards Chalk Farm Road. It is noted that Historic England has responded with the conclusion that the scheme would have a ‘less than substantial harm’.</p> <p>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.</p> <p>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.</p>
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	The amendments to the scheme do not alter this conclusion.
Privacy	Applicant Response: The front elevation of the PBSA block fronting Chalk Farm Road is 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. The amendments to the scheme do not change the findings in terms of impact upon privacy of adjacent residential neighbours.
Daylight/Sunlight	<p>Applicant Response: A detailed DSL analysis has been carried out by Consil, to confirm that the Proposed Development would have an acceptable impact on daylight and sunlight amenity to neighbouring properties, all neighbouring properties retain VSC figures in mid-teens or higher. In the case of the Chalk House, Consil’s report notes that design of the development itself, including the presence of brise soleil and balconies are the main factors in the loss of daylight rather than the Proposed Development. Overall, when considering the site allocation, central location and the need to optimise the site’s potential, in accordance with the NPPF, LBC, London Plan planning policy and BRE guidance, the Proposed Development would have an acceptable effect on daylight and sunlight amenity to the neighbouring residential properties. Whilst there would be some noticeable reductions in daylight, the retained levels of light are consistent with what has been considered acceptable elsewhere in the borough and on numerous other urban developments across London. A supplementary report prepared by Consil (dated 19/04/24) also notes that in order to achieve full compliance with BRE Guidelines, more than half the development would need to be removed, which would impact the wider scheme benefits, including much needed affordable housing and would not optimise the use of this central London site.</p> <p>As observed in decision making at a local level and by the Planning Inspectorate and Secretary of State, the BRE guide needs to be applied sensibly when assessing daylight and sunlight to allow for a more practical approach to central London urban design. This is echoed in the Camden Planning Guidance on Amenity (2021) which states that the Council “...support the aims of the BRE methodology for assessing sunlight and daylight we will consider the outcomes of the assessments flexibly where appropriate, taking</p>



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	<p><i>into account site specific circumstances and context... it may be necessary to consider exceptions to the recommendations cited in the BRE guidance.</i></p> <p>The amendments to the scheme do not change the findings and conclusions.</p>
Student Use	<p>Applicant Response: There is a significant demand for student accommodation within London, particularly in locations well-connected to local transport services. 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. The provision of PBSA can help to limit additional pressure on the wider private rented market.</p> <p>The proposed 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). The nearest PBSA is the Stay Club some 200 metres away, and it can therefore be said that there is not an overconcentration of a PBSA use within this area of Camden. The proposed student accommodation is of a high specification and will address the needs of numerous students studying in Central London.</p> <p>A Student Management Plan prepared by CRM has been prepared and submitted in support of the application which sets out the measures in place to manage the student use efficiently and ensure it does not impact on neighbouring amenity negatively. The proposed student housing would be managed by a dedicated and experienced operator and ensures 24/7 management and security.</p>
Loss of employment	<p>Response: The principle of a loss of employment floorspace on the site was accepted during the consideration of the previous planning application with the Council acknowledged that whilst it would result in a reduction in job opportunities on the site, the</p>



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	<p>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. 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 the site allocation setting out a requirement for a mix of uses including residential uses and student housing is noted.</p>
Heritage	<p>Applicant Response: As concluded within the Heritage, Townscape and Visual Statement prepared by Turley, any 'harm' on the Roundhouse would be minor and within the less than substantial harm spectrum set out by National Planning Policy. Such harm is outweighed by the significant public benefits that the scheme creates, as set out below:</p> <ul style="list-style-type: none"> • 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);



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	<ul style="list-style-type: none"> • 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. <p>In addition, the existing buildings on the site rely on the Roundhouse for structural support and do not complement the circular form of the Roundhouse. One of Regal’s main objectives has been to bring forward a scheme that responds positively to the Roundhouse and improves the pedestrian experience along Chalk Farm Road. We see a key benefit of the scheme being the improvement of the present site condition, transforming this part of Chalk Farm Road and delivering a development of the highest architectural quality that activates the high street and makes a positive contribution to the Conservation Area, whilst enhancing the Roundhouse’s iconic curved structure. The amendments would result in a similar impact to that assessed initially.</p>
Noise	<p>Applicant Response: A draft Construction Management Plan has been prepared and submitted in support of this application which highlights the mitigation measures that will be in place to minimise noise, dust and vibration for surrounding neighbours arising from the construction process. A more detailed Construction Management Plan will also be required to be submitted prior to any demolition or construction to ensure that these mitigation measures occur in practice. There will also be a bond in place and the applicant will also comply with Considerate Constructors Scheme and be part of the local Construction Working Group.</p> <p>A Noise Assessment prepared by Sandy Brown Consultants has also been submitted to confirm that all plant will be designed such that cumulative noise levels remain within the Camden requirements. It concludes that neighbouring amenity will be protected. A condition would also be attached to any Decision Notice to confirm the noise levels that the scheme must comply with.</p>



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Affordable housing	<p>Applicant Response: The Applicant is proposing to meet its affordable housing obligations by bringing forward 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 and has been strongly supported by Officers due to the onsite delivery of much needed affordable homes.</p> <p>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.</p> <p>The proposed affordable C3 housing equates to circa 28% of the scheme based on floorspace (GIA) and habitable rooms in line with London Plan and Camden requirements. Alongside this, there would be 24 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). The proposed approach has also been agreed in principle by the GLA as the strategic authority.</p>
Responses in support	<p>We note comments received regarding the outstanding architectural design and the support offered for provision of student accommodation, as well as the provision of much-needed affordable housing. Other comments note that the scheme will add vibrancy to this strategic, under-utilised site and that Regal are excellent developers with a proven track record and have a strong relationship with the local community. The support offered is welcomed and the comments align with conclusions reached by the consultant team</p>