

<b>Address:</b>	<b>14-19 Tottenham Mews London W1T 4AA</b>		<b>4</b>
<b>Application Number</b>	<b>2020/5633/P</b>	<b>Officer: John Sheehy</b>	
<b>Ward:</b>	<b>Bloomsbury</b>		
<b>Date Received:</b>	<b>02/12/2020</b>		
<p><b>Proposal: Erection of a six storey building (and basement) to provide office (use Class E) at part ground and basement levels and self-contained flats (use class C3) at ground and floors one to five; with associated landscaping, cycling parking and enabling works.</b></p> <p><b>CONSULTATION NOTE: Application is linked to redevelopment of Network building and flats (ref 2020/5624/P).</b></p>			
<p><b>Background Papers, Supporting Documents and Drawing Numbers:</b></p> <p><b>Existing Drawings:</b></p> <p>13565-A-L01-01-001; 002; 100; 101; 200 A; 201; 300; 301; 302; 303.</p> <p><b>Proposed Drawings:</b></p> <p>13565-A-B01-03-099 A; 100 A; 101 A; 102 A; 103 A; 104 A; 105 A; 106 A; 200 A; 201 A; 203 A; 300 A; 301 A; 302 A; 303 A.</p> <p><b>Supporting Documents:</b></p> <p>Energy Statement by TFT Revision 02 dated 27 May 2021; Sustainability Statement by TFT dated 24/11/2020; Preliminary Ecological Appraisal by The Ecology Consultancy dated 11/11/2020; Plant Noise Assessment Report, ref 27931 dated 12 October 2020; Environmental Noise Survey and Acoustic Design Statement Report ref. 27931/ADS1.Rev1 dated 12 November 2020; Air Quality Assessment by Air Quality Consultants dated November 2020; Transport Statement by Caneparo Associates dated November 2020; Travel Plan by Caneparo Associates dated November 2020; Delivery, Servicing and Waste Management Plan by Caneparo Associates dated November 2020; Archaeological Desk Based Study by Andrew Francis, dated 16/11/2020; Daylight and Sunlight Report by Point2 dated 25/11/2020; Daylight/ Sunlight letter from Point2 Consultancy dated 18<sup>th</sup> of May 2021; Internal Daylight Summary letter from Point2 Consultancy dated 19<sup>th</sup> of May 2021; Fire Strategy by Norman Disney &amp; Young Revision 2.0 dated 5 November 2020; Ventilation and Extract Statement by Norman Disney &amp; Young Revision 3.0 dated 14<sup>th</sup> May 2021; Affordable Housing Statement by DS2 LLP dated May 2021; Inclusive Design and Access Statement by Proudlock Associates dated 25-11-2020; Email at 14:05 on May 17 2021 from Hannah Willock setting out Affordable Workspace Terms; Geotechnical and Geoenvironmental Interpretative Report by CGL dated September 2020; Structural Engineering Report and Subterranean Construction Method Statement by Elliott Wood dated 13<sup>th</sup> November 2020; Surface Water Drainage Statement by Elliot Wood dated 13<sup>th</sup> November 2020.</p>			
<p><b>RECOMMENDATION SUMMARY: Grant conditional Planning Permission subject to a Section 106 Legal Agreement</b></p>			

## ANALYSIS INFORMATION

<b>Land Use Details:</b>			
	Use Class	Description	Floorspace (GIA sq. m)
Existing	None	Cleared site	0
	<b>Total</b>		0
Proposed	C3	Affordable homes	2,214
	E(g)	Affordable workspace	364
	<b>Total</b>		2,578

<b>Parking Details:</b>		
	Parking Spaces (General)	Parking Spaces (Disabled)
Existing	0	0
Proposed	0	0

## OFFICERS' REPORT

**Reason for Referral to Committee: Major Development involving the construction of 10 or more new dwellings [clause 3(i)].**

### EXECUTIVE SUMMARY

The proposed redevelopment of 14-19 Tottenham Mews comprises a mixed-use scheme that would provide 23 affordable housing units and 364 sqm of affordable workspace.

This long, narrow site occupies approximately half of the western side of Tottenham Mews in Bloomsbury ward and within the Charlotte Street Conservation Area. There are a number of period properties in the mews but no listed buildings.

Planning permission is sought for the construction of a building 6 storeys tall and with one basement storey to provide 23 affordable homes and 364sqm of affordable office space.

The 23 affordable homes would comprise 10 social rented homes, 4 of which would be large family sized units of 3 bedrooms, the other 6 units would be 2-bed 4 person units. The remaining 13 homes would be studios and 1- and 2- bedroom flats in intermediate rented tenure. All the flats would have access to external space in the form of balconies, roof terraces and Juliet balconies opening onto the mews with large double doors. Access decks at the rear would double as informal amenity space in a quiet part of the site, while the main outlook would be onto the mews at the front which has lost its traditional industrial uses and is now predominantly residential.

The previous two-storey NHS building was of no architectural quality and has been demolished. The proposed building is heavily influenced by its mews location. The design reflects the location and historic development where front elevations are flat-fronted with limited

projections and where utilitarian materials like brick and metal are common. The design team have carefully considered the way the building relates to its context and have sought to integrate the building as much as possible into its setting.

Seven objections were received, from five members of the public. These focussed on a number of issues, including the amenity impact of the proposed building. While the proposal would cause loss of sunlight/ daylight to neighbouring occupiers, and this would be beyond the BRE recommendations in some cases, this needs to be balanced against the dense developed inner urban context, the recent history of decisions in the mews and site-specific factors such as the underdeveloped scale of the previous NHS building on the site.

The proposed development also represents a number of public benefits:

- A high quality piece of architecture.
- A purpose built block of 23 affordable homes.
- Affordable workspace.
- A link through to Bedford Passage, improving permeability of the area.
- A package of contributions would be secured toward CIL funding, Carbon Offset and new or improved public open space.
- The building would incorporate net gains in biodiversity and soft landscaping.

Both this site and the Network Building on Tottenham Court Road are owned by Derwent London. If granted permission, this site could provide housing required under policy as part of re-development proposals for the Network Building, should applications at that site also be granted. However, regardless of the outcome of applications at the Network Building, the 14-19 Tottenham Mews scheme could still go ahead as a conventional one-site mixed-use development should permission be granted, and it is on this basis that the scheme is put forward with a recommendation to approve subject to a Section 106 Legal Agreement.

Paragraph 10 of the NPPF states that there is a presumption in favour of sustainable development, which should be a golden thread running through decision making. The dimensions of sustainable development are economic, social and environmental which should be sought jointly. The proposed development would result in significant benefits through all 3 strands of sustainable development. The proposal is considered to be in accordance with the aims of relevant National and Regional Policy and the Camden Local Plan for the reasons noted above.

Overall the proposed development is considered to benefit the area, and is therefore recommended for approval.

## 1. SITE

- 1.1 Tottenham Mews is located to the rear of the western side of Charlotte Street within Charlotte Street Conservation Area. The eastern side of the mews is occupied by a series of individual mews buildings of varied design which are predominantly 4 storeys in height. The north is closed off by No.13 Tottenham Mews. The mews is accessed from the south via Tottenham Street. The buildings at the southern end of the mews increase in scale with an 8 storey building (Arthur Stanley House) on the south western side of the mews. To the west is Middlesex House, a substantial 5-storey office building, the rear lift shaft of which adjoins the application site.



**Birds eye view of site with Charlotte St/ Fitzroy St in foreground.**

- 1.2 The mews was historically dominated by businesses, however there has been a growing trend towards residential uses with 4, 6, 10 and 11-12 along the eastern side now being in residential use. The general character of the mews is brick faced buildings with panel infills and metal railings with several having tall, large windows at ground level.



**Birds eye view of site from south**

- 1.3 The site is within the area of the Fitzrovia Area Action Plan (adopted 2014) and is one of the sites within the Bedford Passage Group of Opportunity Sites. Formation of a link between Tottenham Mews and Bedford Passage is identified as an objective of this plan. Further development principles for redevelopment of this site include high quality design respecting context and a preference to retain medical use as part of a mixed use scheme also providing C3 housing.

#### **Existing condition**

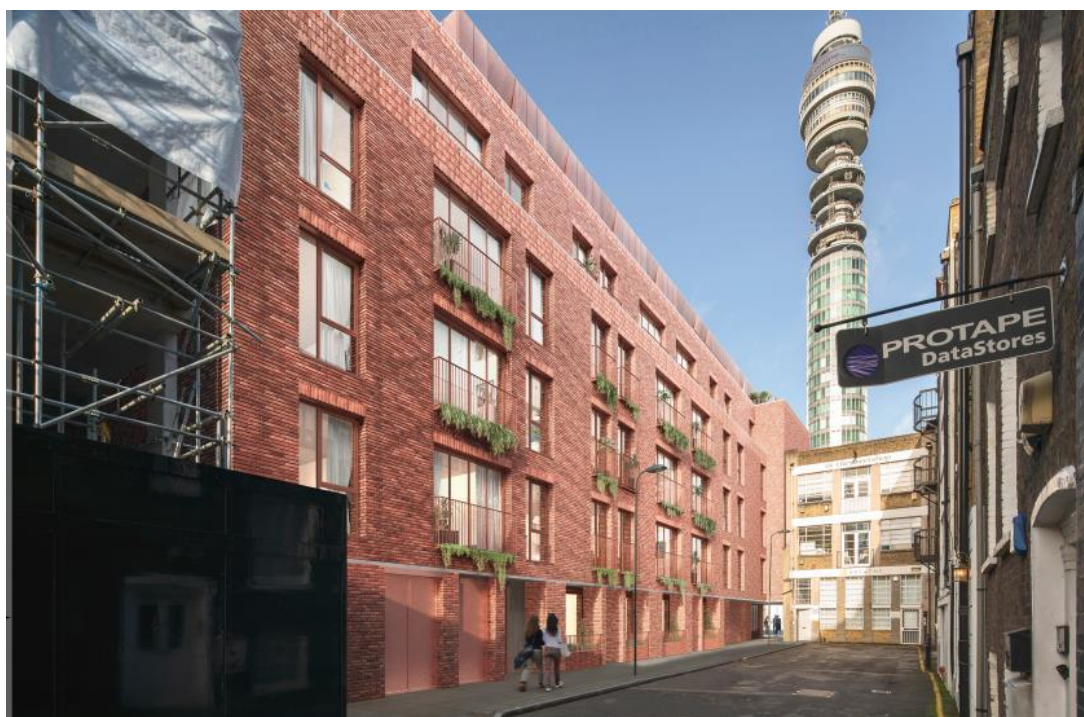
- 1.4 Permission was granted for the demolition of the two-storey building in November 2020 and the site is now cleared.

## 2 PROPOSAL

- 2.1 The application proposes to redevelop the site through the erection of a building rising to 6 storeys in height (7 levels including basement accommodation) to provide 23 affordable homes and 364 sqm of affordable workspace. At the northern end of the site there would be a ground floor pedestrian link connecting Tottenham Mews to Bedford Passage.



**Illustrative view of proposal, looking southward.**



**Illustrative view of proposal, looking northward.**

## Revisions/further information

- 2.2 A number of revisions and clarifications to drawings and supporting documents were received and the following revisions were made to the design, following officer advice:
- Deck access has been introduced to the rear at levels 1 to 5. This has involved:
    - re-orientating the stair core;
    - a change to internal circulation with entrances (and windows) onto the decks;
    - change to the rear elevation which previously had a flat elevational treatment.
  - As a result:
    - the residential units have been reconfigured internally. There has, however, been no change to the mix, tenure or quantum of housing proposed;
    - the entrance for the upper floor flats has been moved northward, closer to the proposed Bedford Passage link.
    - the two ground floor units would now be directly accessible from the street.
  - Grilles have been added to the windows on the northern elevation to ensure privacy;
  - Some windows on mews elevation have been enlarged.

## 3 RELEVANT HISTORY

### *Application site*

- 3.1 Planning permission granted 13/12/2012 subject to S106 Legal Agreement for erection of a 5 storey building, including basement level and roof level plant enclosure, to provide a Mental Health Resource Centre (MHRC) including recovery centre, consultation and activity rooms (Class D1) and 6 x 1 bed short-stay bedrooms (Class C2) (following demolition of existing two storey MHRC building (Class D1)). Refs. 2012/4786/P and 2012/5306/C. The Legal Agreement secured the following obligations:
- Environmental Contribution (£60,000)
  - Highways Contribution (£85,000)
  - Energy Efficiency and Renewable Energy Plan
  - Construction Management Plan
  - Sustainability Plan
  - Service Management Plan
  - Strategic Travel Plan
  - Local Procurement Programme
  - Local Employment Payment
  - Car Free Development
  - Planning Monitoring Fee
- 3.2 November 2020 Permission granted subject to S106 Legal Agreement for demolition of existing two storey building, ref. 2020/3289/P. The Legal Agreement secured the following obligations:
- Demolition Management Plan

- Construction Impact Bond

*Nearby sites*

*Arthur Stanley House, 40-50 Tottenham Street*

3.3 **August 2018** Planning permission granted subject to S106 Legal Agreement for Refurbishment of the existing eight storey Arthur Stanley House (ground plus seven storeys, with two lower ground floor levels), reconfiguration of the seventh floor and extension at the rear of the building and construction of a four storey plus basement new build element to the rear facing Tottenham Mews to enable a change of use from healthcare (Class D1) to a mixed use development comprising office floorspace (Class B1), flexible office (Class B1)/ healthcare (Class D1) floorspace at ground and first floor levels and 10 residential units (Class C3) (2 x 1 bed (private); 6 x 2 bed (private); 2 x 3 bed (social rented)) and associated landscaping fronting Tottenham Mews, ref. 2017/4306/P.

- Affordable Housing (provision on site);
- Car free development;
- Cycle parking contribution £10,980.
- Construction and Demolition Management Plan and monitoring costs £7,564;
- Highways contribution £34,435;
- Environmental Improvement contribution £20,000;
- Travel Plan and monitoring costs £6,432;
- Design stage and post construction Sustainability Plan;
- Energy efficiency plan;
- Decentralised energy contribution £85,404;
- Training and employment contribution £159,190;
- Public open space contribution £52,723
- Local employment, skills and local supply plan;
- Applicant to use reasonable endeavours to negotiate with NHS England with a view to leasing floorspace within the development for use as a GP Surgery at a rent commensurate with community use in the area.

## 4 CONSULTATION SUMMARY

### Statutory Consultees and Local Groups

#### **Historic England Greater London Archaeological Advisory Service (GLAAS)**

- GLAAS have considered the proposals and looked into the information held in the Greater London Historic Environment Record. There is evidence for quarry pits backfilled with domestic rubbish at the Middlesex Annexe site to the north. A significant number of burials have been recorded to the immediate north of the site, and although the site is thought to have been outside the burial ground boundary, alterations and underpinning to the boundary wall may have resulted in disarticulated remains extending to within the site. There may also have been earlier



workhouse buildings extending onto the site which are not shown on historic mapping.

- Considering the nature of the development, the archaeological interest and/or practical constraints are such that a two-stage archaeological condition is advised. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation.

### **Charlotte St Conservation Area Advisory Committee**

- Summary of comments - no objection
- Overall scale is acceptable but the massing of the upper storeys could have been done better to mitigate the height. The building as a whole could have been broken up into vertical 'plot widths' by use of some clever massing and would make the development look less monolithic. In the local vernacular the ground floor is always treated as something distinctive and 'stronger' and the use of little gardens is quite strange and doesn't support the upper storeys very well.
- We would query the brick being used. Is the plan to use typical 'mansion block' red brick or something quite different?
- Route/tunnel is too understated and small. It needs to be much more of a feature if people are going to use it at all, could result in anti-social behaviour.

### **Thames Water**

#### *Waste Comments*

- The proposed development is located within 15 metres of a strategic sewer. Thames Water request a condition to be added to any planning permission relating to piling method statement.

#### *Sewer infrastructure*

- Thames Water requests that development incorporates protection to the property to prevent sewage flooding. Any basement proposals to discharge ground water to the public network would require a Groundwater Risk Management Permit from Thames Water. Expect developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer.
- Thames Water advise no objection to the planning application in terms of impact on waste water network and sewerage treatment, based on the information provided.

#### *Surface water drainage*

- Thames Water advise that if the developer follows the sequential approach to the disposal of surface water they would have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required.

### **Metropolitan Police**

- No objections to the overall proposal but design recommendations in relation to main doors, design of lobby, security standards to residential units, CCTV, bin store and management of office space.

#### *On Bedford Passage*

- "The biggest concern I have for this proposal is the creation of the undercroft passageway at the bottom of Tottenham Mews. Any location within the Holborn area that has this kind of design attracts crime and anti-social behaviour as it offers cover and concealment due to there being no natural surveillance covering the area. The

office space has windows overlooking, but this will not be used 24hrs a day and from the plans there is a perfect 'seat' as a result of the ledge protruding from the window. It has been proven that a 'cul-de-sac' or a 'mews' are one of the safest locations as there is one way in and out which criminals do not like as they have no options for escape if challenged. I strongly recommend that this undercroft is removed".

### **Charlotte Street Association**

- We support the objections made by the Tottenham Mews Residents Association (see 'individual and adjoining occupier responses' below), in particular those relating to the poor quality of the proposed new housing in terms of outlook, daylight, lack of private amenity space and privacy; and the unacceptable loss of amenity suffered by the existing units in terms of outlook and privacy. The lack of POS provision.
- We also strongly support the concerns about the covered link between the sites given the serious identified shortcomings in Plan Policy both schemes should be refused.

### **TfL Crossrail Safeguarding**

- TfL have been considered the proposals and Crossrail Limited does not wish to make any comment on the application as submitted.

### **Other Consultees**

#### **Origin Housing**

##### *Letter in support of the scheme*

- We write as the selected affordable housing partner to the projects at Arthur Stanley House and the Middlesex Annexe/ Bedford Passage projects, which bookend the site at 14-19, Tottenham Mews, where we are also the prospective partner.
- Site: this is a constrained site with but we feel that the application has managed to balance the compromises required to produce a viable affordable housing scheme in an exceptional location.
- Location: affordable housing provision is still limited south of the Euston Road in Camden and this scheme will provide an invaluable opportunity to house those people who live and work in central London who depend on residence in this area.
- Standards: the individual homes meet and generally exceed our minimum requirements of complying with space standards set out in the London Housing Design Guide.
- Mix: the mix of homes offered provide much needed affordable family size accommodation for rent at lower floor levels with homes for smaller families, couples or individuals at intermediate rents which will be targeted at local key workers on the upper floors.
- Wheelchair homes: wheelchair nominees are often circumspect about accepting offers of accommodation in homes above ground floor, so these homes are likely to be popular and would be less likely to have been provided as part of a larger scheme.
- Amenity space: layout generally complies with the key design requirements for affordable housing, the only area of exception being the lack of private amenity space in the form of balconies, although it has to be accepted the central location of

the scheme and the specific site arrangement will limit the ability to achieve this. A better solution for children in family sized accommodation will be to designate part of Tottenham Mews as amenity/ play space.

### Individual and adjoining occupier responses

<b><i>Total number of responses received</i></b>	<b>7</b>
<i>Number in support</i>	0
<i>Number of objections</i>	7

- 4.1 Site notices were displayed from 9/12/2020 inviting comments until 2/01/2021. A local press advert was placed on 10<sup>th</sup> December 2020 inviting comments until 3<sup>rd</sup> January 2021. Seven letters objecting to the proposal were received from individuals.
- 4.2 In addition to this, a combined objection was received from Tottenham Mews Owners Association, an ad hoc group of owners of 8 residential properties and 3 commercial properties within the mews. A letter was also subsequently received from a barrister representing the Tottenham Mews Owners Association. An objection letter was also received from Right of Light Consulting on the impact of the proposal on daylight and sunlight to neighbours - residents of Flats 1, 3 and 7 of 11-12 Tottenham Mews, appointed the consultants.

#### *Principle of Development*

- Housing should be provided at Network Building rather than off-site at Tottenham Mews;
- Displacing housing requirement from Tottenham Court Road to mews site delivers net loss of market homes and insufficient number of affordable homes to satisfy policy;
- Proposed housing crammed onto this site instead of multiple sites;
- As it is quantum of housing falls short of minimum policy requirement, providing 87% of minimum affordable housing requirement and 0% of minimum market housing requirement.
- Proposed commercial floorspace in basement generates further unmet requirement for housing at the site and results in additional height in a small and sensitively located site.

#### *Quality of Units*

- No private open space provided for residents of the scheme. Some private amenity space is provided for intermediate affordable units. Only Juliet balconies are offered to the rest.
- Some units have no private open space e.g. disabled persons flats at ground floor
- Scheme does not comply with private open space standards;
- Juliet balconies are modest in size, not of a practical shape or utility and do not provide privacy.

- Agree with Design Review Panel that any large social rented unit should be provided with at least some directly accessible private external amenity space.
- Justification for lack of amenity space insufficient – if incapable of satisfying need for private open space scheme should be reduced/ reconfigured or abandoned.

### *Impact on Neighbours*

- Loss of sunlight and daylight to occupiers of the mews due to the height of the proposal;
- Numerous windows in numerous flats affected;
- Justification for height in 2012 was because a public health building was proposed and mews had limited residential use;
  - what is now proposed is a commercial building;
  - there are more residential uses in mews, and there will be a substantial daylight/ sunlight impact on a number of residents;
  - design and form of two schemes are sufficiently dissimilar in terms of key dimensions and relation to neighbours that the impact on neighbouring properties of the two schemes cannot reasonably be compared (e.g. overall proposed height is 20.45m compared to 18m approved in 2012);
- Loss of privacy to existing occupiers with new views opened across mews
- This is 4<sup>th</sup> major development in mews in past 5 years with resultant nuisance, noise, dust and access issues;
- Loss of amenity likely to impact on people who are working from home;
- Reducing height of buildings would also lead to shorter construction period;
- Objectors accept that BRE Guidelines are intended to be applied flexibly but impact on residential and commercial neighbours nevertheless unacceptable. The applicant should have made a greater effort to relate the scheme more closely to mews neighbours in terms of height and massing.

### *Scale, massing and design*

- Scale of proposal will ruin “look and feel” of the mews.
- Additional scale over and above 2012 permission is of concern even if 2012 scheme is taken as a ‘baseline’, which it should not be.
- Larger surrounding buildings e.g. Arthur Stanley House relate to primary streets rather than secondary mews lane of lower historic scale.

### *Heritage*

- Existing scale of mews buildings allows appreciation of larger nearby buildings (Arthur Stanley House, BT Tower)
- Two-storey building on site was representative of historic scale of traditional mews buildings
- Potential to affect setting of nearby listed buildings
- Harmful impact on character and appearance of Conservation Area, including impact on views of landmarks, in particular BT Tower.

### *Financial Viability*

- Cost of demolition should not be factored into viability as this has been granted under a different permission;
- No justification provided for lack of provision of market housing.

#### *Public Open Space/ Bedford Passage*

- Public Open Space should be provided on site (at 9sqm per occupant) but none is provided and no justification is provided for this failure. Financial contribution may be pursued as a last resort, but no indication that on site provision has been appropriately investigated.
- Bedford Passage is a poor quality covered connection, not open to the sky.
- Objectors agree with Metropolitan Police concerns about Passage and recommend that this element of the scheme be removed.
- With Bedford Passage opening mews will lose its traditional character and become a lot busier.

#### *Significance of 2012 decision*

- Since this decision the following have been adopted: Fitzrovia Area Action Plan (2014); Local Plan (2017); 2021 Camden Planning Guidance – Amenity. Little if any weight should be put on the 2012 permission when considering the current scheme.
- Caselaw indicates if previous decision is “distinguishable” it cannot be a material consideration; that is the case here.
- The situation in the mews has changed relative to the 2012 Committee Report with habitable rooms at ground floor of 11-12 which require daylight, so circumstances that the officer considered justified the grant of permission then no longer apply.
- “The change of circumstances at the site and Tottenham Mews generally but specifically 11-12, together with the findings in the Right of Light Report are such that it cannot possibly be said that 2012 Consent can be considered to be a material consideration at all”

#### *Parking*

- No parking provided for disabled residents and not clear where in Tottenham Street the three nearest spaces mentioned by the applicant are.
- Not clear whether three bays are sufficient as disabled units have a combined capacity for 7 occupants.

***See the main body of the report for the case officer’s response.***

#### **Engagement:**

- 4.3 The applicant had initial pre-application meetings with officers in 2018 and 2019. Discussions on more detailed proposals took place in June and July 2020.

May 2020



- 4.4 A public consultation webinar was held on 13<sup>th</sup> of October 2020.
- 4.5 Webinars with local stakeholders were held on 8<sup>th</sup> and 22<sup>nd</sup> of October 2020.
- 4.6 Meetings with local councillors were held on 28<sup>th</sup> of September 2020 and with direct neighbours 15<sup>th</sup> October 2020.
- 4.7 An account of the meetings is set out in the Statement of Community Involvement. Discussions at these events covered key planning issues including land use, design, sustainability, transport, scale and bulk of proposed building and impact on neighbour amenity.

### **Camden Design Review Panel**

September 2020



- 4.8 The scheme was presented to the Camden Design Review Panel meeting on 11<sup>th</sup> September 2020. The following key comments were discussed:

- The panel was impressed by the overall design quality of the proposals, and considered the proposed bulk and massing broadly acceptable. However, it recommends that the building layouts are improved to ensure high quality of accommodation for all units.
- The panel is concerned that number of units included in the building is excessive, that they appear squeezed in, with internal layouts and the quality of accommodation compromised.
- Single aspect flats with only a rear aspect should be avoided, flats should have mews aspect.
- The panel was concerned by the lack of amenity space for flats, particularly for social rented units and those that are likely to house children. It asked the team to explore the potential for small balconies, a communal roof garden, and play space in Tottenham Mews.
- Lighting levels should be carefully tested to ensure that homes on both sides of the mews receive good levels of daylight.
- Privacy to the ground floor units is a concern as bedrooms face public route.
- Small balconies should be added to ensure all residents have access to at least some outdoor space.
- Basement workspace will be dark, can daylight be introduced from Middlesex House courtyard?

## 5 POLICIES

- 5.1 The National Planning Policy Framework (NPPF) sets out the government's planning policies for England and how these are expected to be applied. It must be taken into account in preparing the Development Plan, and is a material consideration in planning decisions. The revised NPPF was published 24 July 2018 and updated on 19 February 2019, replacing the previous document published in March 2012.
- 5.2 The Camden Local Plan was adopted by the Council on 3 July 2017 and replaced the Core Strategy and Camden Development Policies documents as the basis for planning decisions. Other local documents which are of relevance include the Proposals Map, and Camden Planning Guidance (CPG).
- 5.3 The Fitzrovia Area Action Plan was adopted as a local plan on 3 March 2014. In the Area Action Plan, the application site is allocated as Opportunity Site 4. The Camden Site Allocations Document 2013 did not include sites in Fitzrovia, since development sites in the area were allocated through the Fitzrovia Area Action Plan, but the draft Site Allocations Local Plan 2020 allocates the site in Policy IDS2. When the draft Site Allocations Local Plan is adopted, it will supersede allocations in the Area Action Plan and the Site Allocations Document 2013.
- 5.4 The London Plan 2021, along with the Mayor's Supplementary Planning Guidance (SPG), are also important considerations as are sections 16, 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

5.5 In making any decisions as part of the planning process, account must be taken of all relevant statutory duties including section 38(6) of the Planning and Compulsory Purchase Act 2004. Section 149 of the Equality Act 2010 is also relevant to the determination of the applications. It sets out the Public Sector Equality Duty, which states that a public authority must have due regard to eliminate discrimination, harassment and victimisation; advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

5.6 The relevant Camden Local Plan 2017 policies are listed below:

G1 (Delivery and location of growth)  
H1 (Maximising housing supply)  
H2 (Maximising the supply of self-contained housing from mixed-use schemes)  
H4 (Maximising the supply of affordable housing)  
H6 (Housing choice and mix)  
H7 (Large and small homes)  
C1 (Health and wellbeing)  
C2 (Community facilities)  
C5 (Safety and security)  
C6 (Access for all)  
E1 (Economic development)  
E2 (Employment premises and sites)  
A1 (Managing the impact of development)  
A2 (Open space)  
A3 (Biodiversity)  
A4 (Noise and vibration)  
A5 (Basements)  
D1 (Design)  
D2 (Heritage)  
CC1 (Climate change mitigation)  
CC2 (Adapting to climate change)  
CC3 (Water and flooding)  
CC4 (Air quality)  
CC5 (Waste)  
TC1 (Quantity and location of retail development)  
TC2 (Camden's centres and other shopping areas)  
T1 (Prioritising walking, cycling and public transport)  
T2 (Parking and car-free development)  
T3 (Transport infrastructure)  
T4 (Sustainable movement of goods and materials)  
DM1 (Delivery and monitoring)

5.7 The relevant policies of the Fitzrovia Area Action Plan are listed below:

F1 (Planning decisions in Fitzrovia)  
Land Use Principle 1 (Housing and affordable housing)  
Land Use Principle 2 (Public open space)



Land Use Principle 4 (Small and medium enterprises)  
Land Use Principle 9 (Residential amenity)  
Land Use Principle 10 (Sustainability and local energy networks)  
Urban Design Principles (Howland Street Character Area)  
Masterplanning Principles (Bedford Passage sites)  
Opportunity Site 4 (Tottenham Mews Day Hospital)

5.8 Relevant supplementary planning guidance is listed below:

Camden Planning Guidance (CPG):

CPG Access for all  
CPG Amenity  
CPG Air Quality  
CPG Artworks statues and memorials  
CPG Basements  
CPG Biodiversity  
CPG Community uses, leisure facilities and pubs  
CPG Design  
CPG Developer contributions  
CPG Employment sites and business premises  
CPG Energy efficiency and adaptation  
CPG Interim Housing  
CPG Planning for health and wellbeing  
CPG Public open space  
CPG Transport  
CPG Trees  
CPG Water and flooding

Charlotte Street Conservation Area Appraisal and Management Strategy April 2011

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## ASSESSMENT

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

<b>6</b>	<b>Land Use</b>
<b>7</b>	<b>Design, Character and Appearance, Impact on Heritage Assets</b>
<b>8</b>	<b>Housing</b>
<b>9</b>	<b>Open space, Landscaping, Trees, Nature and Biodiversity</b>
<b>10</b>	<b>Basement</b>
<b>11</b>	<b>Neighbouring Amenity</b>
<b>12</b>	<b>Transport and Highways</b>
<b>13</b>	<b>Sustainable Design and Construction</b>
<b>14</b>	<b>Air Quality</b>
<b>15</b>	<b>Flooding and Drainage</b>
<b>16</b>	<b>Accessibility</b>
<b>17</b>	<b>Community Safety</b>
<b>18</b>	<b>Land Contamination and Archaeology</b>
<b>19</b>	<b>Refuse and Recycling</b>
<b>20</b>	<b>Economic Benefits, Local Employment and Procurement</b>
<b>21</b>	<b>Equality</b>
<b>22</b>	<b>Fire Safety</b>
<b>23</b>	<b>Community Infrastructure Levy (CIL)</b>
<b>24</b>	<b>Conclusion and Recommendations</b>
<b>25</b>	<b>Legal Comments</b>

### **6 LAND USE**

#### **Land use / principle of development**

- 6.2 As a guiding principle the NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development (paragraph 7) and that a presumption in favour of sustainable development should run through decision making (Paragraph 10). The dimensions of sustainable development are economic, social and environmental which should be sought jointly.
- 6.3 The Council's Local Plan sets a similar guiding principle to the NPPF and has identified four key priorities for the location and delivery of growth. These are set out in the supporting text of Policy G1 at paragraph 2.6:
- Securing self-contained housing and affordable housing;
  - Supporting businesses and job provision by providing or retaining premises to support businesses staying or expanding in Camden and supporting training, apprenticeships and qualification opportunities;
  - Securing infrastructure and services to meet the needs of residents, workers and visitors including transport, utilities, education, health, open

space, emergency services needs and digital infrastructure requirements; and

- Ensuring growth is delivered in a way that protects amenity and avoids harmful effects on existing and future occupiers and nearby properties.

6.4 Policy G1 expects a mix of uses where appropriate and in particular in the most accessible parts of the borough. Policy H1 seeks to maximise opportunities for providing self contained homes with the aim of exceeding the Borough’s housing targets.

6.5 The proposals at this site are housing led (Class C3) but include affordable workspace at ground and basement level (Class E(g)).

6.6 The proposed mix of uses is as follows:

	GIA			
	C3		E(g)	
	sqm	sqft	sqm	sqft
L-01	144.71	1,558	254.73	2,742
L00	279.89	3,013	109.67	1,180
L01	392.27	4,222		
L02	392.27	4,222		
L03	392.27	4,222		
L04	371.89	4,003		
L05	240.28	2,586		
<b>Totals</b>	<b>2,213.58</b>	<b>23,827</b>	<b>364.40</b>	<b>3,922</b>

6.7 The policy assessment below focuses on the following considerations:

- A. **Redevelopment of a site formerly in community use** by providing an affordable housing led scheme
- B. **How the proposed workspace** responds to the policy aim of securing affordable workspace

**A. Redevelopment of a site previously in community use**

6.7 Policy C2 (Community Facilities) sets out that the Council will work with its partners to ensure that community facilities and services are developed and modernised to meet the changing needs of our community and reflect new approaches to the delivery of services. Part g of the policy expects facilities to be retained unless either a replacement facility of a similar nature is provided that meets the needs of the local population or its current/intended users or the existing premises are no longer required or viable in their existing use and there is no alternative community use capable of meeting the needs of the local area.

6.8 The site was used in the past by the NHS as a mental health resource centre. The Committee Report for the replacement facility on this site 2012/4786/P confirms that the former centre on this site closed in April 2011, and occupied a temporary structure built in 1974. The services previously provided at the site have all been relocated and continue to be provided in the local area:

- Community Mental Health Teams: South Camden Services have been relocated to the St Pancras Hospital South Wing, Camley Centre and Residence Building;
- New 6-bed Crisis House and Crisis Resolution Team: constructed in 2014 at St Pancras Hospital;
- South Camden Recovery Centre: this is provided at the Jules Torn Day Centre, St Pancras Way;
- Approved Mental Health Professional Duty Team: provided at St Pancras Hospital.

6.9 Permission was granted for demolition of the two-storey building on the site in November 2020 on the basis that the accommodation was not needed, as confirmed by the NHS, ref. 2020/3289/P.

6.10 The preferred land use in the case of a discontinued community use, is set out in supporting text to paragraph C2 in which paragraph 4.45 states:

“Where an alternative community use cannot be found for the existing facility, the Council will seek the provision of affordable housing as its preferred alternative use. Community facilities generally have a relatively low capital value compared with housing sites. We will seek the maximum reasonable amount of affordable housing in accordance with Policy H4 Maximising the supply of affordable housing, having regard to financial viability. We will expect the proportion of affordable housing to reflect the value of the development site in its former community use”.

6.11 In the Fitzrovia Area Action Plan 2014 the site is identified as an opportunity site within the group of Bedford Passage Sites. The preferred land use is set out as medical/healthcare with any additional floorspace matched by an equal addition to permanent self-contained housing (Class C3) subject to relevant development plan criteria for mixed use development. The allocation reflected a planning permission for a replacement Mental Health Resource Centre (2012/4786/P), which was to have been funded as part of the package of section 106 planning obligations associated with development of the University College Hospital on Euston Road and the former Odeon Site on Tottenham Court Road/ Grafton Way. The Planning Committee acknowledged in March 2018 that the provision of mental health services had now shifted from acute to community support, and agreed to vary the s106 planning obligations to provide support for other mental health services rather than a replacement Resource Centre.

6.12 The Draft Site Allocations Local Plan 2020 allocates the site in Policy IDS2 for self-contained homes and community or health uses. Supporting text summarises the history of the former health use and subsequent Resource Centre proposals, and indicates that a mental health facility is no longer needed on the site. The supporting text notes that the allocation does not seek a community use, but that a small community or health

facility would be an *acceptable* use of part of the site (in conjunction with a housing-led development), reflecting Local Plan Policy C2. Policy IDS2 also indicates that development must provide a safe pedestrian-cycling connection from Tottenham Mews to the route through the former Middlesex Hospital Annexe, respond positively to the character of the Charlotte Street Conservation Area, and contribute to the creation or enhancement of publicly accessible open space nearby.

- 6.13 Camden's Local Plan policies seek to ensure that assessed housing needs to 2031 are met; the requirement is for the provision of 16,800 additional homes, equivalent to 1,120 additional homes per year. Policy G1 expects that much of this need will be met in the designated growth areas and in other highly accessible locations.
- 6.14 The Local Plan's housing target is significantly higher than previous targets. In 2010, the former Camden Local Development Framework set an annual target of 595 additional homes, which was increased by subsequent London Plan revisions up to an annual target of 892 in 2015. The Local Plan acknowledges that meeting the increased housing target of 1,120 per year will be challenging. To respond to this challenge, Policy H1 indicates that we will regard self-contained housing as the priority land-use of the Local Plan, and Policy H2 indicates that, where non-residential development is proposed, we will promote the inclusion of self-contained homes as part of a mix of uses.
- 6.15 In 2018, the Government introduced the Housing Delivery Test as a formal measure of whether development is providing the number of homes required. The NPPF indicates that planning decisions should reflect the outcome of the Housing Delivery Test.
- 106% of Camden's requirements were met in the three years to 2018;
  - 87% of Camden's requirements were met in the three years to 2019;
  - 79% of Camden's requirements were met in the three years to 2020.
- 6.16 In principle the proposed use of the site for an affordable housing-led mixed use scheme accords with Local Plan Policies C2 and G1 and Policy IDS2 of the draft SALP.
- 6.17 Objections have been received based on the commercial development proposed at the Network Building, and that it would not meet the housing requirement generated by that scheme. However, this is a standalone application and its acceptability as a donor or linked site to the Network Building application relates to the acceptability of that scheme in policy terms, whereas this scheme should be considered on its own merits as an affordable housing-led development.

## **B Affordable workspace**

- 6.18 The basement and ground level would provide 364.40sqm of affordable workspace. This duplex unit would provide good quality office space with an active use comprising the entrance and full height glazing onto Bedford Passage and an entrance on the short northern elevation.

- 6.19 The site is located in the Knowledge Quarter area. A 2018 Science and Innovation Audit of the area, sponsored by the Department for Business, Energy & Industrial Strategy, found that the success of the innovation district has placed multiple pressures on its infrastructure including housing, public transportation, digital and telecommunications networks. It also identified specific needs within the innovation district such as:
- the low availability and high cost of appropriate commercial sites and premises;
  - a shortage of innovation space, especially wet-laboratory space for Life Sciences start-ups and small businesses;
  - a lack of suitable move-on space; and
  - lack of business accelerators for start-ups and other small firms.
- 6.20 The site is ideally located to provide affordable workspace responding to the above needs, being a short walk from commercial uses on Euston Road, Tottenham Court Road and Central London as well as the numerous institutions and world-class education and research facilities in close proximity. The provision of affordable workspace is welcomed in the context of Camden Planning Guidance Employment Sites and Business Premises (2018), supplementary to the Camden Local Plan.
- 6.18 The floorspace of 364.40 sqm would be provided at 50% discount for a period of 10 years. At ground floor level 67.20 sqm would be provided, with the remainder in the basement. Floor to ceiling heights would be 2.60m on both levels. The basement level would rely on artificial light and mechanical ventilation as no lightwells are proposed. There are, however, a wide range of processes within Class E(g) which are suited to sites, or parts of sites, where conditions can be more easily controlled. This use class is defined as a commercial or business use that can be carried out in a residential area without detriment to its amenity and comprises:
- **E(g)(i)** Offices to carry out any operational or administrative functions,
  - **E(g)(ii)** Research and development of products or processes
  - **E(g)(iii)** Industrial processes
- 6.19 In the context of the site constraints and the range of uses possible within Class E(g) the quality of the space is acceptable and welcomed.
- 6.20 It is recognised that in order to maximise its success the space will need to be available at the right price for the right occupier. Therefore the s106 obligation for the affordable workspace will require it to be fitted out at no cost to the occupier. Furthermore, in order to ensure that the affordable workspace is targeted at the most suitable occupiers, a s106 head of term will secure a Management & Marketing Strategy which will require preparation and ongoing oversight from a provider or facilitator who is experienced in managing/marketing such facilities for the preferred target market.
- 6.21 Overall the provision of affordable workspace is welcomed, subject to s106 heads of terms which secure its affordability, fitout, marketing and ongoing management, all focussed on occupation by companies focussed on knowledge economy activities.

### *Policy Conclusion*

- 6.22 In land use terms, the proposal is acceptable in principle and is in accordance with the Council's detailed policies and guidance.

## **7 DESIGN and HERITAGE**

### *Introduction*

- 7.1 The site is located on the western side of Tottenham Mews, with a site area of approximately 0.053 hectares. Tottenham Mews is 190m west of Goodge Street underground station, accessed from Tottenham Street running northwards.
- 7.2 The eastern edge fronts onto the mews and its southern edge abuts Arthur Stanley House. Its northern edge faces the Middlesex Hospital Annexe currently being redeveloped. To the west, the site faces the rear of Middlesex House.
- 7.3 The site is within the designated Fitzrovia East Neighbourhood Area, though no Neighbourhood Plan has been adopted for the area.
- 7.4 The building is in the Charlotte Street Conservation Area. There are a number of positive contributors within the mews (6-12 consec) facing the site. The recently demolished prefabricated building on site was identified as a detractor to the conservation area.
- 7.5 There is a designated LVMF view crossing the site: View 2A.2 Parliament Hill summit to the Palace of Westminster. Additionally the conservation area appraisal identifies notable views to local landmarks, primarily the grade 2\* listed BT Tower (outside the conservation area), which serves as a reference point and aid to orientation. There are clear views of the BT Tower from Tottenham Mews.

### *Legislative background*

- 7.6 The site is within the Charlotte Street conservation area which is a designated heritage asset. The site itself has been cleared of built structures. There are no listed buildings in the mews; the nearest listed buildings are the Grade II Former Strand Union Workhouse on Cleveland Street and the Grade II 39 Tottenham Street, a late 18<sup>th</sup> century townhouse with ground floor shop on the corner of Tottenham Street and Goodge Place. Neither of these sites is within close proximity of the site and would not be affected in any way by the proposal. The Grade II listed BT Tower dominates the view looking north from the entrance of the mews and would be a prominent landmark from within the mews if the proposal was granted. On the opposite side of the mews numbers 6-12 are identified as positive contributors to the character and appearance of the Conservation Area.

### *The Planning (Listed building and Conservation Area) Act 1990*

- 7.7 In considering developments affecting listed buildings or their setting, Sections 16 (listed building consent applications) and 66 (planning applications) require local planning authorities to have special regard to the desirability of preserving the buildings and their setting, as well as any features of special architectural or historic interest they possess.
- 7.8 When local planning authorities are considering development affecting a conservation area, Section 72 requires them to pay special attention to the desirability of preserving or enhancing the character or appearance of that area.

*The National Planning Policy Framework 2019 (NPPF)*

- 7.9 The NPPF requires its own exercise to be undertaken as set out in chapter 16 - Conserving and enhancing the historic environment. Paragraph 127 states that planning policies and decisions should ensure that developments function well and add to the overall quality of an area; are visually attractive as a result of good architecture, layout and appropriate and effective landscaping; and are sympathetic to local character and history, including the surrounding landscape setting. Paragraph 189 states that in determining applications, local authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution to their setting.
- 7.10 Paragraph 190 requires local planning authorities to identify and assess the particular significance of any heritage assets that may be affected by a proposal. Paragraphs 193-196 and 202 require consideration as to the impact of a proposed development on the significance of a designated heritage asset, including an assessment and identification of any harm/the degree of harm. Paragraph 193 states: *When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.*
- 7.11 Paragraph 194 says : *“Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:*  
a) *grade II listed buildings, or grade II registered parks or gardens, should be exceptional;*  
b) *assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.*
- 7.12 Paragraph 196 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, where appropriate, securing its optimum viable use.’*
- 7.13 Paragraph 200 requires that opportunities to enhance or better reveal the significance of heritage assets be considered favourably. It states: *‘Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their*



*significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.'*

### *Design quality*

- 7.14 The Council's design policies aim to achieve the highest standard of design in all developments, including where alterations and extensions are proposed. Policy D1 of the Local Plan requires development to be of the highest architectural and urban design quality which improves the function, appearance and character of the area; and Policy D2 states that the Council will preserve, and where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas and listed buildings.
- 7.15 The site is identified in the Fitzrovia Area Action Plan (March 2014) as an opportunity site as part of the 'Bedford Passage' group. It states that, "development at the Tottenham Mews Day Hospital should improve the frontage to Tottenham Mews. Buildings here should address the mews and positively contribute to the streetscape and the environment of the office and residential uses opposite."
- 7.16 The Plan states that development that increases the use of open space should provide new on-site public open space, however where on-site public open space provision is not practical, development should provide improved permeability and contribute towards the creation of public open space between Tottenham Mews and the Middlesex Hospital Annex/Bedford Passage, or an identified site in the vicinity.
- 7.17 Based on the above development at this site should:
- Preserve and enhance the character of the mews as well as the character of the wider Charlotte Street Conservation Area
  - Respond to the character of the mews with appropriate rhythm, scale and massing.
  - Ensure suitable access to the facility and provide good levels of amenity for neighbouring properties.
  - Be of a height which does not harm the strategic viewing corridor from Parliament Hill to the Palace of Westminster

### *Site appraisal*

- 7.18 Historic plans show the site has been occupied by a single building for over 100 years in contrast to the finer urban grain of the east side of the mews. Previously the building on site was a robust brick foundry building, demolished in the 1970s to make way for a prefabricated building, last occupied c. 10 years ago as a mental health resource centre.
- 7.19 Considered to make a negative contribution to the character and appearance of the conservation area, and detracting from the overall character of the street, the prefabricated building has now been demolished. There is an opportunity to redevelop the site and significantly improve the contribution it makes to the townscape by:
- enhancing the character and appearance of the conservation area

- providing good quality affordable housing
- providing a new pedestrian route from Tottenham Mews to Bedford Passage
- improving the public realm within the mews

*Surrounding townscape and development context*

- 7.20 Building heights around the mews reflect the mid-rise urban character of the wider Fitzrovia area, and the development context as an area of ongoing change. At the southern end of Tottenham Mews, Arthur Stanley House is currently being redeveloped as a part eight, part four storey building. The 'Corner House' completed in 2015, to the south-east of the site, with frontages on Charlotte Street and Tottenham Mews is 4/5 storeys, and to the north of the site, the Middlesex Annexe site is currently being redeveloped. To the west, Middlesex House is a five storey Art Deco commercial building.
- 7.21 Immediately adjacent to the site, a planning application has been submitted for a single-storey mansard extension to the top of 13 Tottenham Mews for office use, and also within the mews an infill site is currently under construction at the back of 77-79 Charlotte Street facing Tottenham Mews to accommodate office use.

*Historic development and surrounding townscape*

- 7.22 The character of the Charlotte Street Conservation Area is strongly influenced by its initial development in the Georgian period as a residential suburb and the subsequent social and economic changes that have affected patterns of use and occupation of the buildings. This, and subsequent changes in architectural tastes and styles, is expressed in the changes to the physical fabric and current occupation of the area.
- 7.23 The urban morphology comprises a grid pattern of relatively generous streets dating from the mid-late 18th century, with long streets running north-west to south-east parallel with Tottenham Court Road (the first to be established in the area) and shorter cross streets running south-west to north-east. Underlying this pattern there is a secondary system of narrower mews streets: some are dead ends, others through routes.
- 7.24 The change in the social status of the area during the 18th and 19th century from a wealthy residential suburb to a poorer, more varied area saw the establishment of various commercial and retail uses and smaller residential units on the upper floors of buildings. At the same time the former mews streets that had accessed the rear service accommodation for the large houses became a mix of commercial premises and workshops during the 19th century as the pattern of occupation changed. This pattern of use remains today. Many of the original two storey mews properties were replaced with three storey workshop development in the 19th century with features such as hoists, and large windows to provide light to the workspaces. This area has been an area of change.
- 7.25 The mews are characterised by narrow entrances, shared, generally cobbled surfaces and a range of commercial uses within former mews properties or subsequent 19th century workshop buildings. The interest in the buildings is in the retained large ground

floor doors and small scale of the mews buildings, the large workshop windows, the doors at upper levels often with hoists that would have enabled the delivery of materials, and the retained surfacing. The roofs of the buildings are generally concealed by a parapet. Tottenham Mews retains some interest in their more humble commercial buildings. The mews comprises predominantly brick buildings, with fenestration of a horizontal emphasis and large openings at ground floor. These existing mews properties are characterised by a hardworking ground floor that has a direct and open connection with the street.

### **Assessment of proposals**

#### **Design response**

- 7.26 The proposed building stands at six stories, comprising a ground floor commercial unit and residential accommodation above.
- 7.27 The proposals seeks to respond to the existing mews character with a robust brick building that provides good quality housing.
- 7.28 The use of masonry with punched apertures reflects the rhythms of the fenestration seen in the surrounding buildings. Depth is added through Juliet balconies, set backs at lower and upper floors and subtle detailing within the brickwork. The result is of a building that interprets materials and details local to the context.

#### **Ground floor/access/public realm**

- 7.29 The ground floor presents a self-contained affordable workspace unit, two wheelchair accessible units and a residential entrance and core for the flats across the upper floors.
- 7.30 There are two access points to the commercial unit – one from Bedford Passage and the other from the northern corner of the Tottenham Mews elevation – which are defined clearly and visibly and will help to activate the new routes around the building. The main residential core is accessed from the mews, together with two independent entrances for the GF flats, providing a separation between commercial and residential entrances. The ground floor arrangement and location of the residential element is considered logical due to the location of the passage and moves to activate this new route.
- 7.31 The building line steps back at ground floor to offer some defensible space to the flats at ground floor level, which also has a 1.1m balustrade, increasing privacy to the wheelchair units and providing the opportunity for greening, with a designed planting zone.
- 7.32 Towards the northern end of the mews, the building line steps back further, widening to provide a new route through to Bedford passage to the north, which is a key aim of the Fitzrovia AAP, and will improve permeability in the area. The passage, cantilevered over by the proposed building, is proposed to be well lit, with windows facing it from the affordable workspace to enhance security and to prevent anti-social behaviour.
- 7.33 Further public realm proposals being explored include improvements to the mews surfacing with the introduction of planters, bike stands etc. These plans should be developed further with Highways to ensure improvements to the pedestrian environment.

## **Scale and massing**

- 7.34 The proposed building is six storeys overall with a full storey basement and follows the existing building line fronting Tottenham Mews. The building is c.20.45m above existing ground level to the top of the lift overrun. The primary frontage of the building is 33.6m wide and is 12.7m at its deepest point.
- 7.35 This height is consistent with prevailing building heights in the area and concurrent with the immediate development context including Arthur Stanley House, the Corner House, Middlesex Annexe. In addition, thought has been given to the way the building relates to its more sensitive mews context and heritage assets: several devices have been employed to break down the massing of the building, particularly where visual impact and amenity is most sensitive.
- 7.36 The tallest element is stepped back from the mews, towards Middlesex House, which is a robust office building fronting Cleveland Street. At six storeys, the proposal is taller than the mews properties to the east, which are three and four storeys, however through the sculpting of the building form ensuring the upper floors are recessive, it is considered that the proposed building will sit comfortably in the mews context.
- 7.37 Within Tottenham Mews, the proposed building has a four storey shoulder height, reflecting the proportions of the mews buildings; at upper levels the roof steps back from the main body of the building in order to reduce the sense of scale when in the mews itself. The building mass is articulated with two set-backs, one on the fourth floor to respond to the prevailing four storey building heights within the mews, and a further set-back on the fifth floor, reading as a separate roof form. These set-backs will distinguish the upper floors from the primary three storey body of the building and will reduce the perceived height of the building as experienced at street level, and ensure that the top floor will not be in view from within the mews.
- 7.38 The gable elevation to the north has also been carefully designed: the massing steps away at upper levels from Bedford Passage and reduces the visual bulk when viewed along the new route.
- 7.39 The views tested as part of the application show that the development would not cause harm to views of the BT Tower from within the mews, nor encroach on the LVMF viewing corridor.

## **Detailed design and materiality**

- 7.40 The mews elevation creates texture and richness in the facade of the building through its use of a subtle material palette and a variety of window opening sizes and Juliet balconies, introducing a contemporary interpretation of the mews character.
- 7.41 The Tottenham Mews elevation responds to the character of the mews by offering a variety of opening sizes, materiality and facade rhythm across the building. There is subtle variation in the fenestration grid which ensures the proposed building facade is broken down to avoid a monolithic building. The longer window apertures respond to the horizontal emphasis of window openings further along the mews through discussion with Camden officers. The ground floor is more open with wider openings to reflect the mews shopfront typology and to present a more vibrant ground floor adjacent to the pedestrian route across the site leading to Bedford Passage to the north.

- 7.42 Turning the corner into Bedford Passage, the fenestration is more regular and visual screening is proposed to increase privacy to bedroom windows. The entrance to the new pedestrian route through to Tottenham Mews has been detailed in a traditional manner with rounded glazed brick corners. The entrance to the passage is further detailed with a reflective, ceramic ceiling to light up the space. These high quality elements add an additional layer of visual richness to the building, which is particularly welcomed to enhance the conservation area.
- 7.43 A robust, warm-toned material palette has been developed to compliment the immediate surroundings, adding to the rich variety of masonry and materials already apparent in the local vernacular and the upcoming developments on the mews.
- 7.44 The overall material palette identifies red brickwork across the facades, reconstituted stone detailing, and metal cladding. The proposed materials respond contextually to the established palette in the area and are welcomed in this proposal. Brick is a prevalent building material in the Charlotte Street Conservation Area, and predominant within the mews itself. It is an appropriate choice due to its robustness and ability to stand the test of time.
- 7.45 Painted metal cladding in a warm tone is proposed to be used at ground floor to create variety which reflects the character of the mews frontages. Together with the brick, the red-toned metalwork, and upper floor cladding further contribute to the richness of the façade. Reconstituted stone details will help to add further detail and refinement to the façade, breaking down the mass of the building through horizontal banding at first and fourth floor levels.
- 7.46 The design relies on the quality and subtlety of materials and detailing. These are conditioned to ensure a building of the highest quality with a durable finish that weathers gracefully. Condition 4 requires submission of a wide range of design details.

### **Design Review Panel**

- 7.47 The scheme was presented to the Camden Design Review Panel meeting on 11th September 2020. The following key comments were discussed and subsequently addressed:
- Single aspect units facing Middlesex House (west) were omitted, replaced by dual-aspect units with frontages to Tottenham Mews.
  - Privacy to the ground floor units has been increased with the introduction of a wider defensible zone between ground level windows and the pavement.
  - The depth of Juliet balconies facing Tottenham Mews has been increased

### **Conclusion**

- 7.48 This high quality contemporary design response draws on surrounding influences, responding creatively to the site and is welcomed. Composition and detailing have been well considered and this proposal demonstrates a high quality example of how to positively plan for growth in a sensitive context.
- 7.49 The conservation area has many fine architectural examples dating from the 18th, 19th and 20th centuries, and the qualities of those examples have been sensitively drawn upon to help provide a contemporary expression of those characteristics on the site. The proposed building is carefully crafted in form and in detail to create a high quality piece of architectural design. Consequently, the building provides a significant enhancement

to this site, which has a negative impact on the CA, improving the frontage to Tottenham Mews, and would serve to enhance the character and appearance of the conservation areas in compliance with policies D1 and D2.

7.50 In order to ensure consistency throughout the construction phase of the development the Legal Agreement will require retention of the scheme architects Piercy & Company.

## **8 HOUSING**

### *Principle of residential*

8.1 The development will provide 23 affordable homes across 2,214sqm (GIA) of floorspace. As the site was previously in medical use the net uplift in the number of homes is therefore 23. The 23 homes would be provided as 10 Social Affordable Rent and 13 Intermediate Rent. The principle of residential uses on the site is discussed in section 6 above.

### *Mix of tenures*

8.2 The 10/ 13 split equates to percentage ratios of 43:57 by unit count and 49.7: 50.3 by floorspace.

8.3 London Plan Policy H4 seeks to maximise the delivery of affordable housing, with the Mayor setting a strategic target of 50% of all new homes delivered across London to be genuinely affordable.

8.4 For the purposes of London Plan policy H5 the development proposals are classified as 100% affordable housing. Policy H4 of the Local Plan seeks a 60/40 split between Social-affordable Rent and Intermediate Housing. The proposed scheme provides 43% as Social Affordable Rent and 57% as Intermediate Rent and 49.7% and 50.3% when measured by floorspace. The mix of tenures has been prepared with input from LB Camden Housing officers and Registered Providers and has focused on balancing the mix of larger, family sized social rented homes alongside a focus on smaller intermediate rent units in order to achieve affordability. The proposed tenure mix has greater intermediate rented weighting, however, as the overall benefits in housing terms of a 100% affordable housing scheme are substantial and in line with Camden's wider policy aims, this split is considered acceptable.

### *Mix of sizes*

8.5 The table below sets out the mix of unit sizes. The Intermediate homes are provided in 1- and 2- bed units, with the larger 2B4P designed for sharers, in order to achieve the necessary affordability. There are no 1-bed social-affordable homes, nor are there any 2B3P units but this is considered acceptable in the context of the overall mix which targets high-priority 2- and 3-bed units for 4- and 5- person households. Overall the mix responds well to the priorities identified in Camden's Dwelling Size Priorities Table, and is welcomed.

	<b>Social-affordable Rent (%age)</b>	<b>Intermediate Rent</b>	<b>%age of total</b>
Studio	0	2 (15%)	(2) 9%
1B2P	0	3 (23%)	(3) 13%
2B3P	0	3 (23%)	(3) 13%
2B4P	6 (60%)*	5 (38%)	(11) 48%
3B5P	4 (40%)	0	(4) 17%
<b>Total</b>	<b>10 (100%)</b>	<b>13 (100%)</b>	<b>100%</b>

\*Includes 2 wheelchair units

### *Rents and Service charges*

- 8.6 The application proposes that the Social-affordable rent homes will be provided for London Affordable Rent. The rent levels in Table 9 of the Affordable Housing Statement (see Table below) are in accordance with GLA London Affordable Rent levels for 2020/21 and would be secured as part of the Head of Terms 'On-site Affordable Housing' in the s106 legal agreement.

<b>Unit size</b>	<b>Rental levels 2020/21(pw)</b>
2-bed	£169
3-bed	£178

### **London Affordable Rent levels**

- 8.7 London Affordable Rents are exclusive of service charges. Camden Housing SPG 2020 (para 3.22) sets out that '*service charges for affordable housing are generally expected to be around £15 per week or £780 a year at most. To ensure that service charges are kept to a minimum, the communal parts of affordable housing should be designed for durability and low maintenance costs*'. Details of the service charge would be secured as part of the s106 legal agreement, with a view to securing a sustainable and affordable approach to long term service charges.
- 8.8 Intermediate Rent (inclusive of service charge) is proposed for the intermediate tenure, with homes affordable to households on gross incomes of between £31,950 and £42,600 (adjusted for wage inflation). Rents are calculated on the basis that housing costs (rent and service charges) being no greater than 40% of net income and net income being 70% of gross income.
- 8.9 These levels would be secured as part of the 'On-site Affordable Housing' Heads of Term in the s106 legal agreement.
- 8.10 London Affordable Rent (LAR) and Social Rent (SR) are broadly the same, and are both accepted by our CPG Housing as suitable forms of low cost rent for those most in need, but grants are paid for LAR under the Mayor's 2016-2023 funding programme, and will only be paid for SR under the subsequent programme. The Legal Agreement will have flexibility to allow for SR if the scheme is built out after the end of the LAR grant programme has come to an end. If they are provided for Social Rent, rent levels will be at target rents calculated in accordance with the national formula, and are likely to be marginally lower.

### *Quality of residential accommodation*

- 8.11 Policy D1 of the Local Plan seeks to secure high quality design in development and D1(n) focuses on need for a high standard of accommodation. Housing quality and standards also receive significant attention in the London Plan and associated guidance.
- 8.12 The flats are located over 6 floors from levels 0-5. Levels 0, 1 and 2 have London Affordable Rent tenure with two flats on ground floor and four flats at first and second. Level 3, 4 and 5 would be Intermediate Rent. The Apartment Schedule indicates that the flats exceed national space standards for all units apart from the studio units, which measure 35.1sqm and 32.6sqm rather than the 37sqm target. These both benefit from good outlook and access to a Juliet balcony on the mews side as well as the semi-private deck on the other side which provides informal amenity space in a secluded part of the site with south-west aspect. On balance this shortfall in space can be considered to be justified in the context of the quality of the layouts and the fact that they represent 2 out of 23 units, many of which are well in excess of the minimum standards. The building would have a single lift core, serving 3 to 5 flats per floor, each accessed from a short and naturally lit communal corridor. The circulation stairs would be prominently located off the entrance lobby a convenient alternative to using the lift.
- 8.13 Dual aspect has been achieved to all units in the development apart from the two studios which have a shower room against the wall onto the deck. These are through-units with a doorway onto the deck, which will enable cross-ventilation and easy access to this semi-private informal amenity space. The applicant has worked positively with officers to minimise single aspect and this is especially welcomed in the context of this tight urban location. For design, heritage and townscape reasons the principal elevation onto the mews has limited capacity to accommodate large balconies, however Juliet balconies have been accommodated here. The introduction of deck access to the rear has provided additional outdoor space at the site in the form of semi-private space that would be shared by 2, 3 or 4 flats, depending on the level. This is a quiet rear area which will benefit from good levels of privacy outside of office hours when Middlesex House is shut. It will be shielded from road noise and air pollution and will benefit from a south-westerly aspect. Along with Juliet balconies on the mews elevation the scheme would provide a high quality of accommodation, bearing in mind the tight central location.
- 8.14 The apartments achieve 2.5m floor to ceiling height in accordance with the Mayor's housing SPG. The room sizes are considered to be acceptable and the layout of each flat is considered to be well planned. This has been achieved by revisions carried out by the applicant during the application period. In each unit, the entrance door opens into a hallway rather than directly into living space, which is welcomed. The improvements of the layout are largely a result of the relocation of the stair core. This has facilitated dual aspect to all units and more efficient layouts that are easier to plan than the narrow units initially proposed. These improvements were requested by the Camden Design Review Panel.



- 8.15 The internal daylight report states that 45 of the 68 rooms (66%) will achieve the suggested ADF values for their relevant room use. If 1.5% is taken as the suggested ADF value for the Living Kitchen Diners then this figure increases to 48/68 (71%).
- 8.16 Daylight levels are affected by overhanging access decks and constraints related to the location of the site in a dense central London context next to substantial buildings such as Middlesex House to the southwest.
- 8.17 Officers consider that the decks perform an essential role in providing access and semi-private external space for occupiers, so the slight reduction in internal daylight levels as a result is acceptable.
- 8.18 Due to the linear layout of the site there would be limited potential for occupants to overlook each other. Views into flats could, however, be afforded via windows onto the access decks at the rear. The rooms served by these windows are mostly kitchens which are not the most sensitive in terms of visual privacy. Kitchen windows overlooking the deck could enable its use by children as a supervised play space. On the northern elevation screening is proposed, using a slatted structure to disrupt views between units but not block daylight.
- 8.19 Across the floors, the flats are stacked to mitigate noise transfer between different room types.

#### *Management of deck space*

- 8.20 Internal corridors were initially proposed, however these would have needed to be mechanically ventilated and artificially lit. During the application period discussions took place to secure improvements to the layout. The applicant was concerned that a switch to deck access may not be agreeable to registered providers who may have issues with management of such spaces. Officers requested a meeting on this subject, which was attended by one of the potential registered providers, Origin Housing. At the meeting, the Origin representative did not raise specific concerns about the management of deck space when questioned by officers on this subject. Camden's Housing Department do not share these concerns and it is considered that the deck layout is acceptable from a management point of view.

#### *Accessibility*

- 8.21 Policy H6 of the Local Plan requires 90% of new-build self-contained homes in each development to be accessible and adaptable in accordance with Building Regulation M4(2), and 10% to be suitable for occupation by a wheelchair user or easily adapted for occupation by a wheelchair user in accordance with Building Regulation M4(3).
- 8.22 All of the residential units accord with Building Regulations M4(2) and this would be secured by condition. Two ground floor 2-bed flats (Social-affordable Rent) are proposed as wheelchair units. London Plan Policy D7 require at least 10% of new build dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings'. As the scheme is 100% affordable, the local authority will be responsible for allocating or nominating tenants and the two units should therefore be 'wheelchair accessible', but as the application site falls within the definition of Small Sites (Policy H2 of London Plan), there is flexibility in applying the accessible housing requirements. As a result, the

proposed accessible provision goes beyond normal policy expectations and is welcomed. A condition secures the two nominated units as Wheelchair Accessible (ie fitted out prior to occupation).

#### *Communal space*

- 8.23 Policy C2 (Community facilities) sets out that the Council will seek planning obligations to secure new and improved community facilities and services to mitigate the impact of developments. The CPG Community Uses, Leisure and Pubs Jan 2021 notes that the Council will address the cumulative impacts of development on community facilities using funding from the Community Infrastructure Levy (CIL). In some instances where the potential impact is significant a financial contribution will be sought via S106 legal agreement rather than relying on funding through CIL. In this case officers have considered whether it would be appropriate to secure a S106 financial contribution to further mitigate the impact of increased housing on community facilities in the local area. Taking account of the scale of the development and the difficulty of matching a contribution to a specific need generated by the proposal, it is considered that an additional contribution is not required in this instance. There is scope for the local CIL contribution to be used towards local facilities and a further contribution will therefore not be sought.

#### *Housing: conclusion*

- 8.24 Overall it is considered that the development would provide high quality new affordable homes, each generously sized and with a high quality of amenity. The housing would make a significant contribution to meeting housing need in the borough and is welcomed, subject to securing the delivery of the affordable homes to the identified levels of affordability, in accordance with policies H1, H2, H4 and H6.

## **9 OPEN SPACE, LANDSCAPING, TREES AND NATURE CONSERVATION AND BIODIVERSITY**

#### *Ecology*

- 9.1 The ecological report submitted with the application was prepared before the site was cleared in late 2020 and deals with condition when the previous building was in place. This structure covered the complete site apart from small areas of hardstanding. The report states that natural or semi-natural habitat was largely absent from the site, apart from some introduced shrub and ephemeral vegetation growing in cracks. The site contained no areas which are Habitats of Principal Importance or Camden BAP (Biodiversity Action Plan) habitats. The survey found no evidence of protected species or their habitats on site. The report makes recommendations for adding net biodiversity gain to the site through incorporating nesting boxes for sparrow and black redstarts and planting opportunities.
- 9.2 Given the presence of PV panels and the extent of the blue roof drainage, there are limited opportunity to introduce biodiversity on the roof, however the applicant has introduced an area of green roof, details of which would be secured by condition. The

access decks to the rear benefit from a favourable aspect and provide opportunities for localised planting in pots and on trellises. A condition would also secure incorporation of bird boxes.

### *Trees*

- 9.3 There are no trees on or near the site the site and no trees are proposed to be removed in order to facilitate development.

### *Public open space*

- 9.4 Local Plan policy A2 seeks public open space provisions for major applications. The policy applies a standard requirement of 9sq. m of public open space per occupant for residential schemes. When assessing the occupancy of developments, the formula for calculating the public open space requirement recognises that occupancy rates vary across the borough and so it takes account of the local average household size. Using the CPG formula for 23 new flats in Bloomsbury ward (average household size of 1.84 people) provides an open space requirement of 380.88sqm.
- 9.5 The existing building covers the full plot and provides no public open space. The only public open space contribution that can be reasonably be made on-site is a Bedford Passage measuring 28.7sq which will be secured for this purpose. As recognised in the Fitzrovia Area Action Plan, the majority of this provision for this constrained site will need to be provided off site. Therefore in accordance with policy A2 and CPG Public Open Space a pro-rata financial contribution towards improving the quality and capacity of existing public open space as a payment in lieu (PIL) of provision will be secured by a head of term 'Open space contribution' in the s106 legal agreement.
- 9.6 In calculating the financial contribution, the residential contribution of 352sqm (380.88 – 28.7) and the Class E affordable of workspace, which measures a total of 364sqm. The CPG formula for capital costs and 10 years maintenance provides an open space contribution figure of £95,040 from the residential element and £6,142.50 from the workspace elements amounting to a total of £101,182.50. This figure would be secured by s106 legal agreement.

## **10 BASEMENT DEVELOPMENT**

- 10.1 Policy A5 states that developers are required to demonstrate with methodologies appropriate to the site that schemes maintain the structural stability of neighbouring properties; avoid adversely affecting drainage and runoff or causing other damage to the water environment; and avoid cumulative impact upon structural stability or water environment in the local area. Furthermore the siting, location, scale and design of basements must have minimal impact on, and be subordinate to, the host building and property.
- 10.2 A number of criteria for basement development on smaller sites or under existing buildings are included within the policy but would not be applicable to this development, being a comprehensively planned site.

- 10.3 The proposals are to develop a single basement level to house plant equipment and affordable workspace accommodation.
- 10.4 The submitted Basement Impact Assessment (BIA) was reviewed by the Council's independent auditor Campbell Reith. Initial comments on shortcomings and issues were resolved with revisions to the BIA.

*BIA: technical content*

- 10.5 The proposed basement will cover the full extent of the site including Bedford Passage and will require c.4.1m of excavation. Following preliminary works of site clearance a contiguous piled wall will be installed around the basement perimeter. Once this is completed and fully propped, excavation will take place to prepare and construct to base slab and lift pit. It is stated that new basement liner walls will be constructed inside the existing as well as columns up to the ground floor slab. The ground floor slab will then be cast, providing a permanent prop to the basement retaining walls.
- 10.6 The applicant's Geotechnical Report states that restricted access inside the previous building due to the presence of asbestos allowed only external trial pits to be undertaken in order to identify the depth and geometry of the existing and the neighbouring building foundations. This data has been supplemented by adjacent site investigations undertaken at Arthur Stanley House to the south and Bedford Passage to the north.
- 10.7 The available information indicates that the on-site geology comprises Made Ground to 4.0m depth over Lynch Hill Gravel Member to 8.5m depth over London Clay. Groundwater monitoring data suggest groundwater (to a level of 5.0 bgl) within the Lynch Hill Gravel Member.
- 10.8 The proposed single basement floor is anticipated to be above the groundwater level, with localised dewatering possibly required only for the construction of the lift pit excavation. CR accept that the proposed development is not anticipated to impact the hydrogeology of the local area.
- 10.9 A Ground Movement Assessment has been undertaken to predict the impact on surrounding structures from the installation of a contiguous piled wall proposed. The assessment indicates minimal vertical and horizontal ground movement within Burland Category 0 to Category 1 damage for the neighbouring properties, which is within the range accepted by policy A5. Detailed input and output data from the modelling has been provided to justify the conclusions presented.
- 10.10 A Surface Water Drainage Statement has been provided which includes a SuDS strategy for the proposed development. CR have advised that the proposed surface water management will be significantly better than the existing case and there will be no harmful impact to the surface water from the proposed development.
- 10.11 It is accepted that, assuming appropriate design and good control of workmanship, the proposal will not have an adverse impact on the stability of the surrounding buildings and infrastructure.

### *BIA: conclusions*

- 10.12 Campbell Reith (CR) conclude that the proposed development will not have a significant impact on the hydrogeology or slope stability of the area. Furthermore, with the proposed SUDS and attenuation measures, CR accept that the proposed development will not impact on the hydrology of the area. An outline design of the proposed retaining wall for the new basement was included and the revised BIA submission indicates that damage to surrounding properties will not exceed Burland Category 1. No significant impact to surrounding infrastructure is expected.
- 10.13 A condition requires the engagement of a suitably qualified engineer for the final basement design and the duration of the construction works. A condition also requires compliance with the methodologies of the approved Basement Impact Assessment. Subject to these conditions, the basement proposals accord with the requirements of policy A5 and Camden Planning Guidance and are acceptable. A requirements for 'Approval In Principle' to excavate next to the highway would be secured as part of the separate legal agreement.

## **11 IMPACT ON AMENITY OF NEIGHBOURS**

- 11.1 The Development Plan requires decision makers to have due regard to impacts on neighbouring uses and occupiers, particularly residential, on matters including daylight and sunlight, outlook, overlooking and noise, construction impacts and disturbance.

### **Daylight and Sunlight**

- 11.2 The height of the building would be substantially greater than the pre-existing NHS building. The NHS building had a height of 7.5 metres whereas the proposed building would have a height of 20.45m to top of the highest point of the roof, a stair overrun.
- 11.3 The following are photos of the mews with the previous building in place:



2017

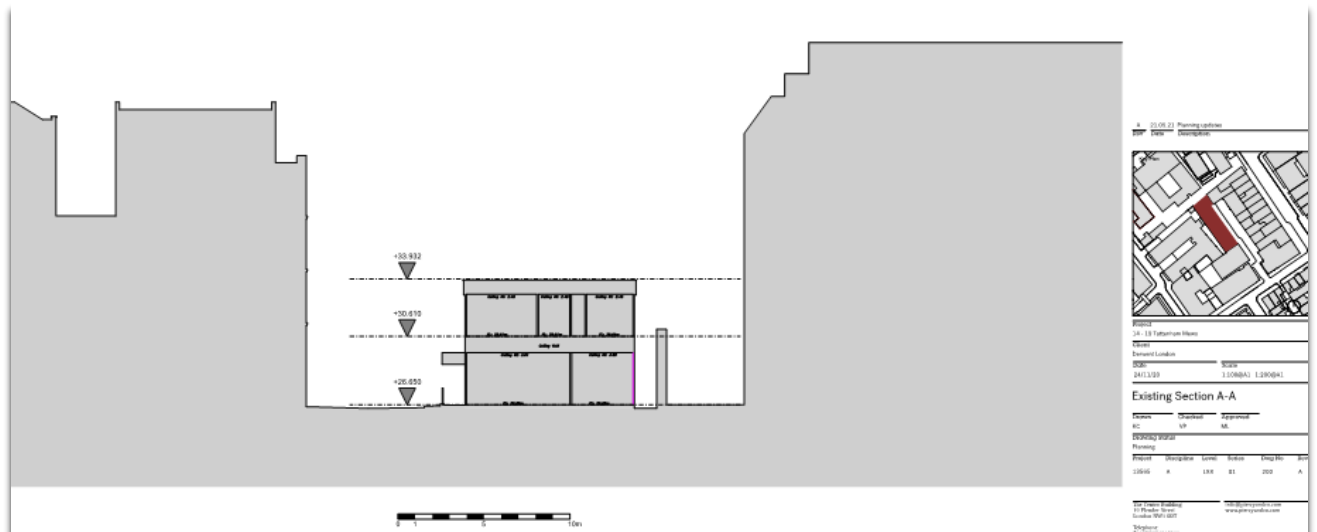


2020



2020

11.4 Section through previous building:



Section drawing (Tottenham Mews on left, Middlesex house on right)

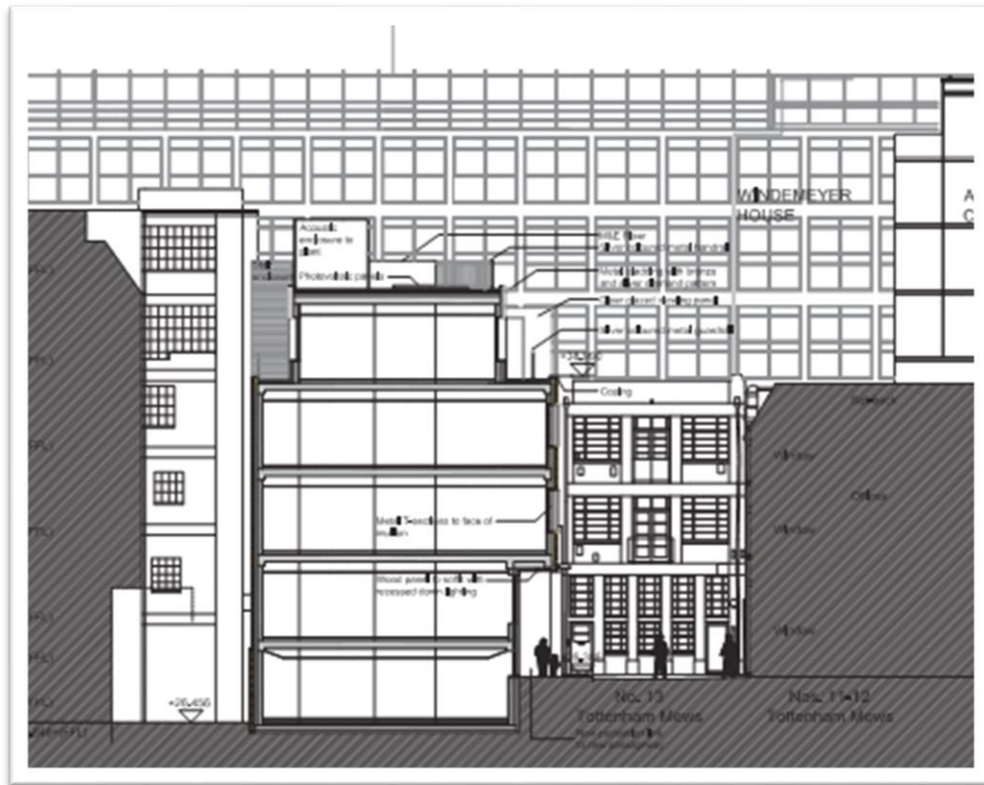
11.5 Permission was granted in November 2012 for a ground plus four storey scheme, comprising a new mental health resource centre (2012/4786/P).

**2012 permission**

11.6 The 2012 permission, now expired, relates to the same site as the application building. It sought to develop the same plot of land to a greater scale than the 2-storey NHS day

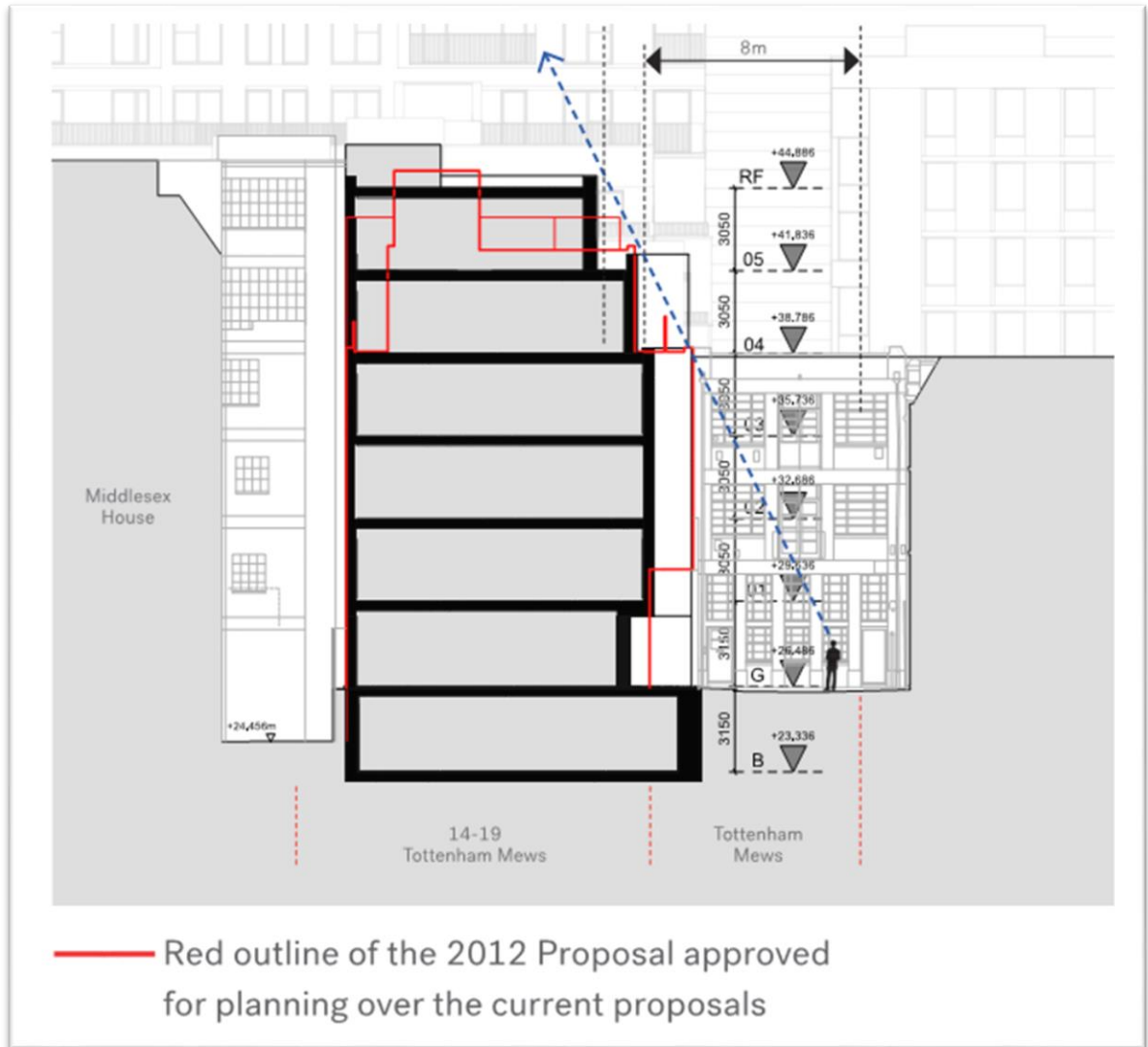
hospital. The Council is not bound or constrained by the decision made in 2012, nevertheless the scheme is a useful indicator of the heights and impacts that were found to be acceptable in the recent past. While the two schemes are not identical, as set out in further detail below, the 2012 scheme is a useful comparator when considering the amenity impacts of the current proposal.

Section through the 2012 approved scheme:



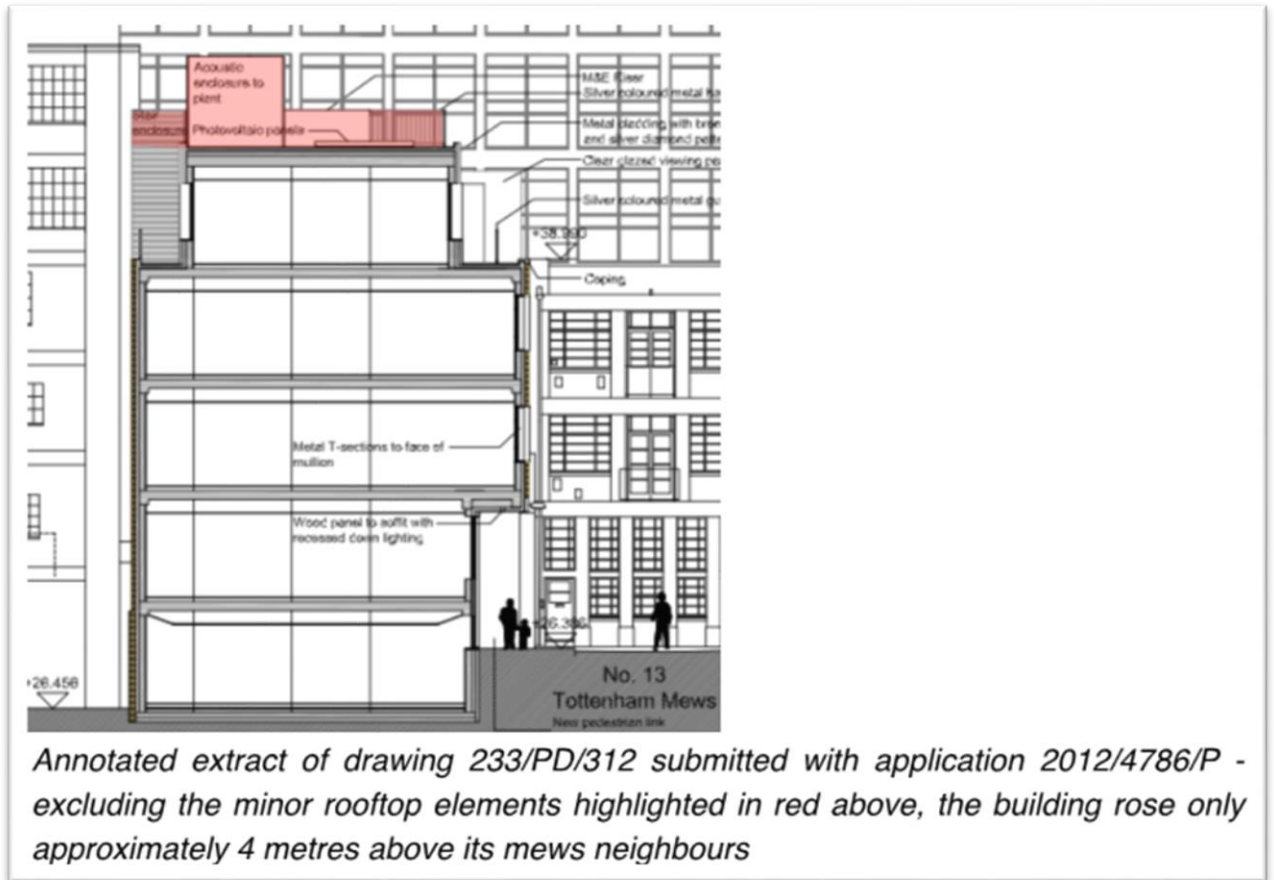


11.7 To illustrate the difference in massing the applicant has represented the difference to the proposed scheme in the Design and Access Statement as follows:

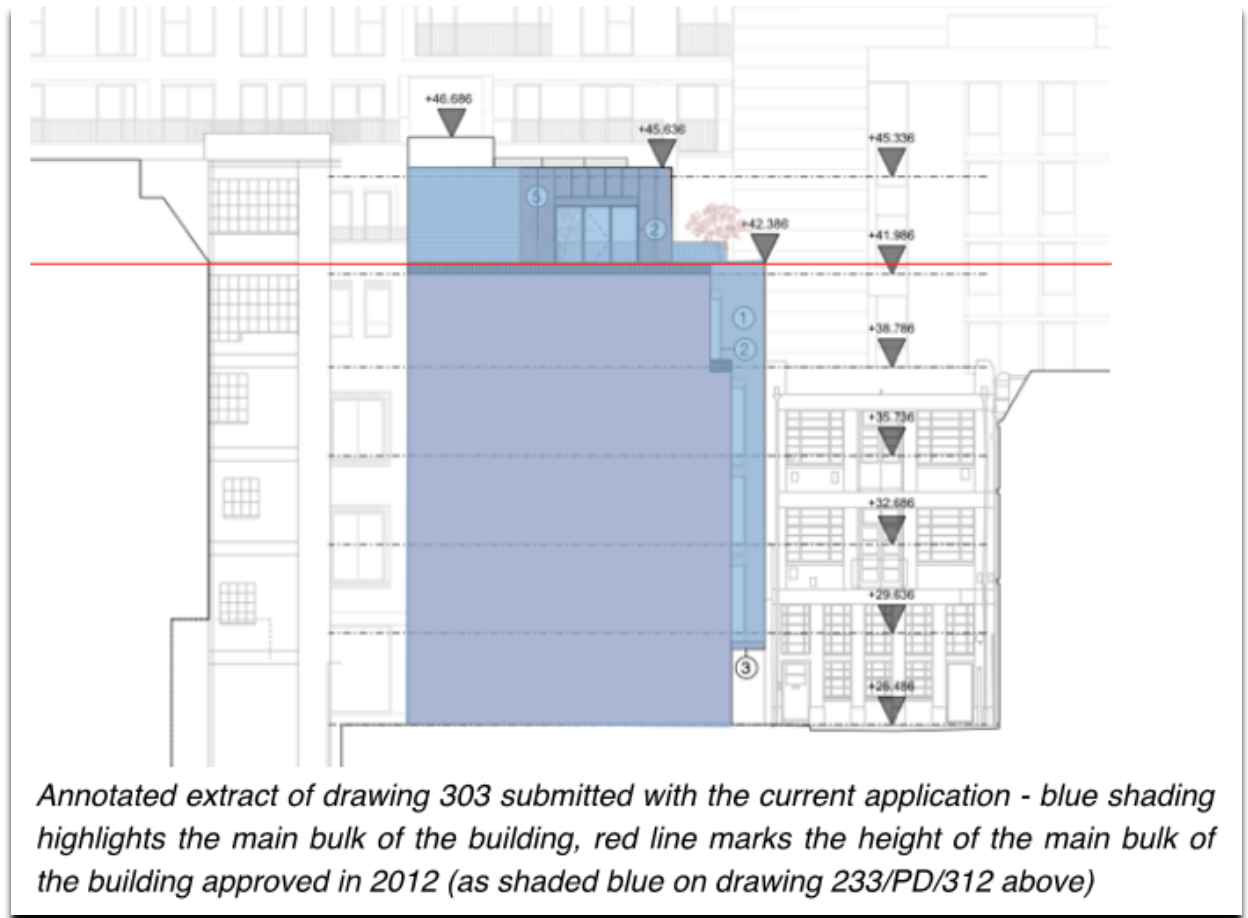


11.8 Objectors to the proposal have illustrated the difference as follows:

**2012 Approved scheme** (rooftop plant highlighted in pink):



Proposed scheme (image from objectors):



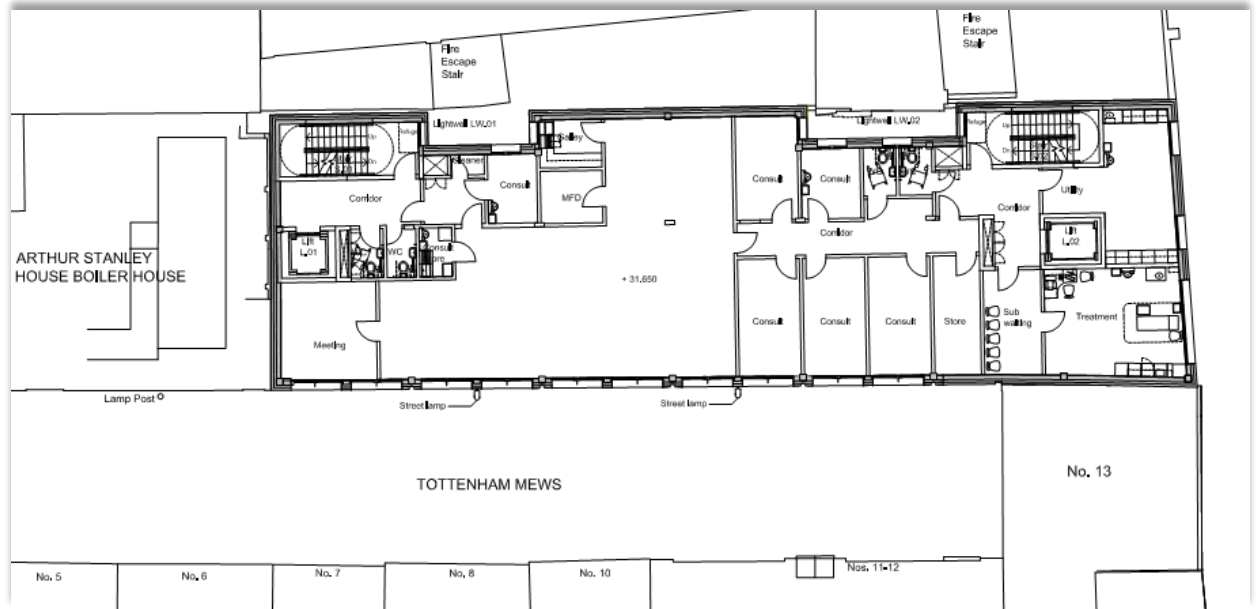
11.9 The difference in heights between the NHS building, the 2012 permitted scheme and the current application is as follows:

<b>2012 scheme vs. current scheme</b>			
	<u>Existing building</u>	<u>2012 building</u>	<u>2020 building</u>
<u>Total height (m)</u>	7.5	18	20.45
<u>Height excluding plant/ancillary rooftop elements (m)</u>	7.5	16	19.2

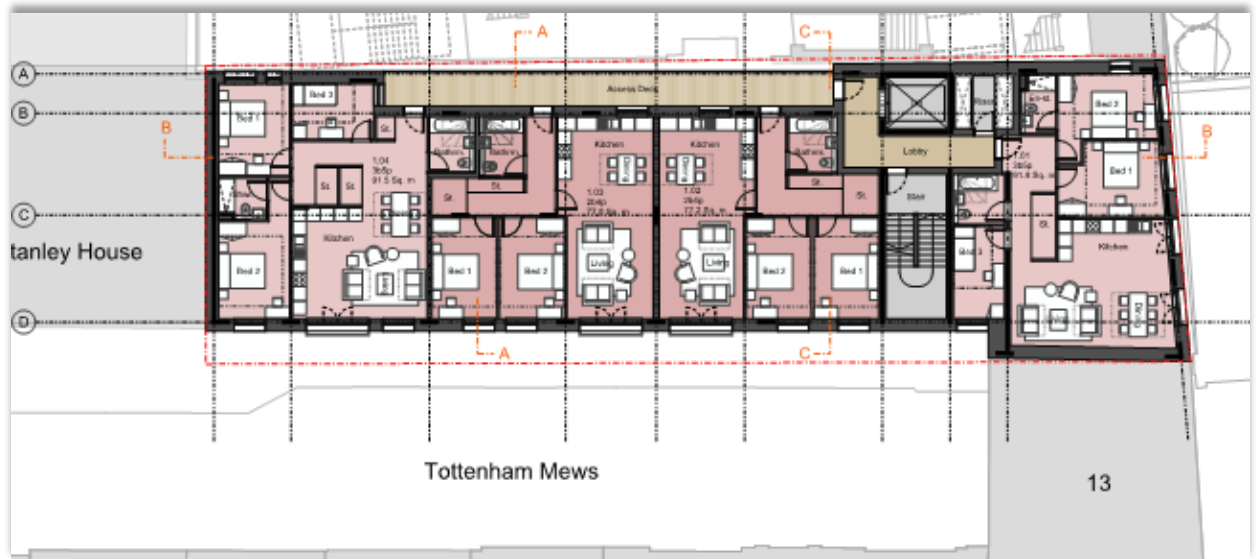
*Building line: 2012 scheme and current scheme*

11.10 An important difference to note between the schemes relates to the front building line.

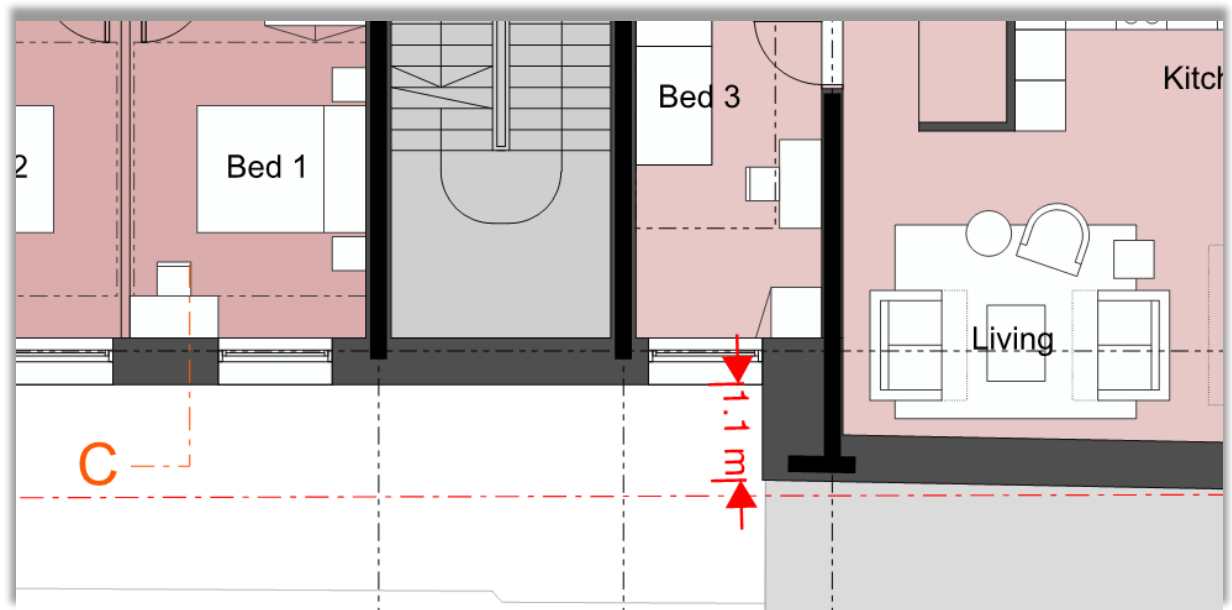
2012 scheme – Approved first floor



Proposed first floor plan (current scheme)



11.11 The 2012 scheme stepped further forward into the mews than the proposed scheme. This can also be seen in the section drawings above. The difference in distance is 1.1m:



## Analysis

11.12 To quantify the impact on daylight and sunlight the applicant has engaged independent consultants Point 2 to model the impact of the proposed development on neighbouring properties including in Tottenham Mews and has submitted a Daylight and Sunlight Report. A follow-up report was received following the internal inspection of nos. 10 and 11-12 Tottenham Mews. However, while this provided some further information on the uses of affected rooms, it did not depart materially from the findings of the main report which are summarized below.

11.13 In terms of impact on neighbouring occupiers, the report makes use of three standards in the assessment of existing versus proposed daylight and sunlight levels:

1. Vertical Sky Component (VSC) - A measure of the amount of sky visible at the centre of a window. *The BRE considers that daylight may be adversely affected if, after development, the VSC is both less than 27% and less than 0.8 times (i.e. a reduction of more than 20%) its former value.*
2. Daylight Distribution (DD), also known as No Sky Line (NSL) - The area at desk level inside a room that will have a direct view of the sky. *The DD figure can be reduced by up to 20% before the daylight loss is noticeable (i.e. retain 0.8 times its existing value).*
3. Annual Probable Sunlight Hour (APSH) - A measure of the amount of sunlight that windows within 90 degrees of due south receive and a measure of the number of hours that direct sunlight reaches unobstructed ground across the whole year and also as a measure over the winter period. *The BRE considers 25% to be acceptable APSH, including at least 5% during the winter months.*

- 11.14 It is industry practice to review changes in light by reference to the BRE methodology and criteria. Due to the built up nature of the urban environment it is an inevitable that daylight and sunlight will be more limited in urban areas, such as surrounding the application site in the Central London Area. Officers consider that in such situations there may be many factors to be considered in addition to daylight and sunlight in contributing to overall amenity for occupiers of existing buildings. The BRE notes that while the Guidance offers numerical target values in assessing how much light from the sky is blocked by obstructing buildings, 'these values are purely advisory and different targets may be used based on the special requirements of the proposed development or its location'.
- 11.15 Within the report a wide range of properties were assessed for daylight/ sunlight impacts, of which the most affected residential properties are as follows:
- 11.16 No. 6 Tottenham Mews The assessment shows reduction in VSC daylight to the most affected windows was 14.9% and 19.38% where a reduction of no more than 20% would be considered adequate.
- 11.17 In terms of Annual Probable Sunlight Hours, the report states that all rooms will adhere to BRE Guidelines.
- 11.18 No. 10 Tottenham Mews – this is a 4-storey residential property opposite the application site, with commercial use below. Vertical Sky Component reduction would be 50% at first floor, 43% at second floor and 35% at third floor and 19.55% at fourth floor. A reduction of 20% of the former VSC is considered to be noticeable, so these reductions would be noticeable to residents of the property. The modelling states that when compared to the 2012 consent, the 1st floor living room would retain absolute VSC values within 0.7% of those that would have been retained if the 2012 consent was implemented. The 2nd floor bedrooms would retain a VSC within 1.4% of the consent. At third floor the retained VSC would be within 2.6% of the 2012 scheme. The report does not state what the difference between the schemes would be at fourth floor level but at 19.5% reduction the windows at this level meet the BRE guidance
- 11.19 The No Skyline test indicates there would be a 71% reduction at the first floor window, 63% at second, 60.5% at third and 27% at fourth floor. These would be similar to the effects of the 2012 scheme at first and second floor. At the third floor the impact would be 13% more significant. The 4<sup>th</sup> floor living room would experience what the report describes as a "more noticeable change between the two schemes although it should be remembered the room only marginally exceeds the NSL criteria in the existing baseline condition and meets the VSC test".
- 11.20 In terms of APSH the rooms on the 1st and 2nd floors would experience alterations beyond recommended levels in the BRE guidance. The 2nd floor bedroom would retain the suggested winter APSH of 5% and an Annual APSH of 22%, just below the suggested 25%. When considered against the 2012 consent, the winter APSH levels would stay the same, while the reduction in annual APSH for the 1st and 2nd floors would not exceed 2%.

## *Assessment*

- 11.21 The reduction in sunlight and daylight to this property raises concerns as in many cases the results set out in the report would not meet the targets set out in the BRE guidelines and there would be a noticeable impact within properties.
- 11.22 However, the guidelines also advise that a more flexible approach needs to be taken to the target values particularly in city centres (para 1.6, BRE Guidelines 2011).
- 11.23 This property is dual aspect with windows to the rear which would not be affected by this proposal. It is also noted that the front rooms at second and third level, which would be affected by loss of sunlight and daylight are bedrooms, which may have less need of sunlight. In the 2012 application the sunlight and daylight impact on 10 Tottenham Mews was assessed within the Committee Report and the impact was taken into consideration when permission was granted, although it is accepted that the overall sunlight/ daylight impact of this proposal on no. 10 is greater than that scheme, albeit marginally so.
- 11.24 Considering all of the above these factors and the constraints of the mews, while there would be a reduction in sunlight and daylight levels, on balance this would not be to such a significant extent as to warrant refusal of the application.
- 11.25 No. 11-12 Tottenham Mews: in relation to this property the report demonstrates that there would be a reduction in VSC to some windows that would not comply with targets set out in the BRE guidelines.
- 11.26 Flats 1 and 2: at lower ground and ground, four windows would experience reduction in VSC of 56% or 57%. Retained VSC for Flat 1 would be 5.95%. When compared to the 2012 consent, there is less than 0.8% difference in the VSC between the two schemes which would not be noticeable. In terms of NSL, the two LKD's would experience alterations of 52% or 31%. When compared to the 2012 consent, there would be a change to these rooms of 11% and 24%.
- 11.27 In terms of Annual Probable Sunlight Hours, the report states that they would retain an annual level of 16% or 17% which is reasonable for a dense mews location; the windows to these flats are obscure glazed so a reduction in sunlight relative to the 2012 scheme may not be noticeable for residents.
- 11.28 Flats 3 and 4: at first floor, five of the windows would experience reductions in VSC of between 47% and 52%, the sixth window, located beneath an overhang, would experience an reduction in VSC of 74%. Retained VSC for windows to flats at this level would be 8.74%, 9.90% and 10.02%, 11.95% and 12.15%. In terms of NSL, three rooms would experience alterations between 60-69%.
- 11.29 In terms of Annual Probable Sunlight Hours, the report states that the main habitable rooms (LKDs) at this level would retain the suggested winter APSH value of 5% and an Annual APSH of between 21% and 22%, which is just below the 25% suggested but good sunlight for a mews in central London.
- 11.30 Flats 5 and 6: at second floor three of the windows would experience reductions in VSC of between 38% and 39%. Again, a window under an overhang would see a large

reduction in VSC of 69%. Compared to the 2012 consent, the difference would be less than 3.2% at this level.

- 11.31 In terms of Annual Probable Sunlight Hours, the report states that the difference between the 2012 scheme and the current proposal is between 2% or 3% so it would be difficult to distinguish between the two schemes in terms of sunlight. The sunlight levels are in accordance with BRE Guidelines at this level in any case (apart from the anomalous window under the overhang), achieving 28% of available sunlight, which is in excess of the 25 % target and 6% in winter (against 5% target).
- 11.32 On the 3<sup>rd</sup> floor, Flat 7 contains two bedrooms and an LKD which are served by a total of four windows. One of these windows would adhere to the BRE Guidelines for VSC. The other three windows would experience alterations in VSC between 29% and 31%. All three windows would retain a VSC in excess of 20%, which is reasonable for a dense central London location. In comparison with the 2012 consent, these three windows would see a reduction in VSC of between 4% and 4.2%. In terms of NSL, two of the three rooms would adhere to the BRE Guidelines. The remaining room serves a bedroom, which, as the report states, the BRE guidelines consider to be 'less important'; it would experience a reduction of 58%.
- 11.33 In terms of Annual Probable Sunlight Hours, the report states that the difference between the 2012 scheme and the current proposal is between 2% or 3% so it would be difficult to distinguish between the two schemes in terms of sunlight. The sunlight levels are in accordance with BRE Guidelines at this level in any case, achieving 41% of available sunlight, in excess of the 25 % target and 11% in winter (against 5% target).

#### *Assessment*

- 11.34 As is the case with Number 10, the reduction in sunlight and daylight to this property raises concerns. In many cases the results would not meet the targets set out in the BRE guidelines and the impact would be noticeable within properties.
- 11.35 The relative impacts and resulting VSC levels would not comply with BRE guidance. However, in practice greater flexibility is usually afforded to VSC levels in urban environments such as this, where a retained level of over 15% is generally considered to be consistent with comparable daylight levels at ground level and above in Central London traditional streetscapes. The levels at ground and first would not quite achieve 15%, however the flats are dual aspect flats with access to west and east light.
- 11.36 When considering the 2012 scheme, the sunlight and daylight impact on 11-12 Tottenham Mews was assessed within the Committee Report. These properties were not in residential occupation at the time but permission was in place for change of use to residential at all levels (ref. 2011/5279/P). The proposal would have also resulted in a loss of daylight and sunlight to the properties that was outside of the BRE Guidelines nevertheless permission was granted for the proposal. This is an important material consideration as amenity policies have not changed significantly since the 2012 decision.
- 11.37 The application site has been underdeveloped in comparison to the remainder of the mews where properties are generally built over 4 or 5 levels, with the 8-storey Arthur



Stanley House at the mews entrance. The NHS facility was over two levels at 7.5m in height. When replacing underdeveloped sites with higher density developments, it is often the case that daylight and sunlight reductions exceed the national advice set out in the BRE Guidelines. This is one of the reasons why a flexible approach is advised within the Guidelines.

*Rights of Light Consultants Sunlight/ Daylight letter*

11.38 This letter submitted by neighbours provides an analysis of the impacts based on the measurements set out in the applicant's report in relation to flats within 11-12 Tottenham Mews.

11.39 This categorises the impacts as follows:

Negligible	No alteration or a small alteration from the existing scenario which is within the numerical levels suggested in the BRE guidelines.
Minor Adverse	Marginal infringements (20.1-30%) of the numerical values suggested in the BRE guidelines, which should be viewed in context.
Moderate Adverse	Moderate infringements (30.1-40%) of the numerical values suggested in the BRE guidelines, which should be viewed in context.
Major Adverse	Major infringements (40%+) of the numerical values suggested in the BRE guidelines, which should be viewed in context.

11.40 The VSC results for the affected properties are categorised as follows:

**Flat 1, 11-12 Tottenham Mews**

Room	Window	Existing VSC %	Proposed VSC %	Loss
R1/19 – LKD	W1/20	13.74	5.95	56.70%

**Flat 3, 11-12 Tottenham Mews**

Room	Window	Existing VSC %	Proposed VSC %	Loss
R1/41 - LKD	W1/41	16.82	8.74	48.04%
R1/41 - LKD	W2/41	19.77	9.90	49.92%
R1/41 - LKD	W3/41	20.85	10.02	51.94%

**Flat 7, 11-12 Tottenham Mews**

Room	Window	Existing VSC %	Proposed VSC %	Loss
R1/43 - LKD	W2/43	28.81	20.10	30.23%
R2/43 - Bedroom	W3/43	29.05	20.19	30.50%
R3/43 - Bedroom	W4/43	29.09	20.67	28.94%

11.41 The NSL results are categorised as follows:

The NSL results in Point 2's report also demonstrate that the above flats will experience major adverse impacts as a result of the proposed development. To summarise:

- The LKD (room R1/19) at Flat 1 will experience a loss of 51.6% and be left with light to 45% of its area
- The LKD (room R1/41) at Flat 3 will experience a loss of 68.8% and be left with light to 28% of its area
- The LKD (room R1/43) at Flat 7 will experience a loss of 18.2% and be left with light to 81% of its area
- The bedroom (room R2/43) at Flat 7 will experience a loss of 58.1% and be left with light to 41% of its area
- The bedroom (room R3/43) at Flat 7 will experience a loss of 8.2% and be left with light to 91% of its area

11.42 In terms of loss of sunlight the letter states

*Out of the five LKD windows mentioned above which need to be considered for the sunlight test, four windows (W1/20 at flat 1 and W1/41, W2/41 & W3/41 at flat 3) all experience losses in excess of 50% both annually and in the winter months. This clearly demonstrates the major adverse impact that the proposed development will have on the sunlight receivable by these windows at*

*ground and first floor level. The second floor LKD window (W2/43 at flat 7) will receive APSH to less than 0.8 times its former value annually and in the winter months, but will maintain more than 25% annually and 10% in the winter months, so this does not amount to non compliance with the BRE guide, but highlights a significant absolute loss nonetheless.*

*Daylight/ Sunlight Other Issues*

- 11.43 Objections have been received on the grounds that the proposal would result in loss of daylight and overshadowing to the commercial units in the mews. Commercial units are not protected in terms of access of daylight in the same way that residential properties are therefore this does not form part of the consideration of the proposal.

*Daylight/Sunlight: conclusion*

- 11.44 The proposal would result in an impact on the daylight and sunlight to certain homes compared to the previous condition. This would result in harm to the living conditions of some residents as set out above. The impact on these residents would be greater than if the 2012 permission was built out.
- 11.45 The 2012 scheme developed the same plot of land with a single building. The scale and density of the 2012 scheme was typical of a central London location. Because of the similarity of the schemes, the 2012 approval is a useful comparator to what impacts and heights may be acceptable.
- 11.46 While the proposed building is taller than the 2012 scheme it should be noted that the 2012 scheme came further forward into the mews which explains why the Point 2 Report finds that the differences in sunlight/ daylight between the 2012 scheme and the current scheme are relatively marginal. There are large impacts on the upper floors but daylight and sunlight levels would still be relatively good at those levels for a central London location.
- 11.47 The absolute loss of daylight and sunlight is in large part due to the application site being underdeveloped, and the proposal being of a density and scale that would be more typical of a central London location.
- 11.48 It could be argued that the residents who would experience a loss of sunlight and daylight as a result of this scheme have benefitted from unusually high levels of sunlight and daylight for such a central location. The homes that would be impacted are generally dual aspect with other sources of daylight than the mews elevation. They would continue to receive levels of daylight which are broadly typical for their central London location and on balance the development is considered acceptable in terms of sunlight and daylight.

## **Outlook**

- 11.49 The additional bulk proposed follows established building lines, albeit being taller than the previous building on the site. The outlook and sense of enclosure experienced within properties in the surrounding area would not be impacted harmfully from the proposed development.

## **Privacy and Overlooking**

- 11.50 The closest residential windows are located approximately 10 metres from the application site on the opposite side of the mews at no. 10 and nos. 11-12. It is generally expected that 18 metres is sufficient distance between windows to prevent overlooking, however this is not always possible to achieve in urban environments. The mews already has building in residential use on either side of the highway with windows facing each other and this is accepted as providing an appropriate level of privacy. New views would be opened to properties to the north across Bedford Passage: a condition is attached requiring screening to the windows and the terrace that face northward in order to ensure no loss of privacy to properties to the north. Subject to this condition, the proposal is considered to be acceptable in terms of privacy.

## **Noise and vibration**

- 11.51 The proposal includes provision of plant. This would be located at roof level to the rear of the building within a plant enclosure. The application is accompanied by an acoustic report which details the plant that will be installed. The report provides the background noise levels and sets the noise limits the plant must comply with to meet Camden's Noise standards. The report demonstrates that the proposed plant will comply with the noise standards. The report has been assessed by the Council's Environmental Health Team who consider that the plant would operate within the required noise standards. A condition will be imposed to ensure that the plant continues to operation with the Council's noise standards.

## **12 TRANSPORT**

- 12.1 A Transport Statement (TS) has been submitted in support of this application. This includes details of trip generation analysis from the TRICS trip generation software. The person trip generation of the proposed development, office + residential, would be generate 22 trips (10 in, 13 out) in the AM peak, 18 trips (8 in, 10 out) in the PM peak, and 165 (81 in and 84 out) daily (07:00-19:00). The trip generation of the previous healthcare floor space has not been assessed, however the uplift caused by the proposed development is unlikely to be significant.

### *Car Parking*

- 12.2 Policy T2 of the Camden Local Plan states that the Council will limit the availability of parking and require all new developments in the borough to be car-free. To prevent the future occupants from obtaining on-street parking permits from the Council, the

development should be car free and this should be secured by means of a Section 106 Agreement.

#### *Cycle parking*

- 12.3 Cycle parking will be provided for all site uses in line with the new London Plan standards. The residential units will be provided with a dedicated cycle store, located at basement level and accessible via lift, providing cycle parking for 45 cycles, in the form of 2-tier cycle stands. The office element of the site will be provided with a dedicated cycle store at ground floor level adjacent to the office space, with space for 6 cycles to park through the provision of 2-tier cycle stands. The space between the stands is less than 2500mm, as required by CPG Transport clause 8.44. The spacing has been amended accordingly.
- 12.4 In accordance with CPG Transport clause 8.16, the route to cycle parking from street level must be step free. If a lift is to be used, the internal dimensions should be a minimum of 1.2 x 2.3m as per London Cycle Design Standards. This has been amended to 2.4m x 1.5m and complies.
- 12.5 Internal doors should have a minimum width of 1.2m; all doors to be used by cyclists conform with this minimum dimension and the door to the cycle store will be automated.

#### *Excavation near the public highway*

- 12.6 The works would include excavation for a new basement floor and the installation of a piled retaining wall around the perimeter of the site. We must ensure that the stability of the public highway adjacent to the site is not compromised by the proposed basement excavations. The applicant would be required to submit an 'Approval in Principle' (AiP) report to our Highways Structures & Bridges Team within Engineering Services as a pre-commencement obligation. The template for the AIP is found in the British Standard CG300. The AIP would need to include structural details and calculations to demonstrate that the proposed development would not affect the stability of the public highway adjacent to the site. The AIP would also need to include an explanation of any mitigation measures which might be required. The AIP and an associated assessment fee of £1584.01 + VAT would need to be secured as a section 106 planning obligation if planning permission is granted.

#### *Pedestrian route to Bedford Passage*

- 12.7 This should be built to adoptable standards and in the interests of public safety, the link should be illuminated. Illumination levels would be set at an appropriate level will be set by condition.

#### *Deliveries and servicing*

- 12.8 It is expected that delivery vehicles for the proposed development will make use of suitable sections of single yellow line within Tottenham Mews, in the same manner as

other properties within the mews are currently serviced. It is expected that larger delivery vehicles such as 7.5t box vans, will be required to reverse into Tottenham Mews, due to the narrow width of the mews street preventing turning manoeuvres by large vehicles. This is an existing constraint experienced by existing properties on Tottenham Mews.

- 12.9 The TA estimates that the 23 residential units will generate 2-4 deliveries per day and the office space will generate circa 1 delivery per day giving a total of approximately 3-5 deliveries per day.
- 12.10 A draft Delivery, Servicing & Waste Management Plan (DSWP) has been submitted with the application and this is welcomed. The DSWP would need to be covered by a section 106 agreement if planning permission is granted.

#### *Managing and mitigating the impacts of construction*

- 12.11 Construction management plans (CMPs) are used to demonstrate how developments will minimise impacts from the movement of goods and materials during the construction process (including any demolition works). The proposal is also likely to lead to a variety of amenity issues for local people (e.g., noise, vibration, air quality, temporary loss of parking, etc.). A framework CMP has been submitted in support of the planning application. Details include the erection of welfare facilities in Tottenham Mews and various parking suspensions in the area. These would be subject to approval following submission of the draft CMP. While the information provided in the draft is useful, a more detailed CMP would be required if planning permission is granted. The final CMP would require significant input from Council officers, local residents, and other stakeholders before being approved. We would seek to secure a CMP, a CMP implementation support contribution of £28,520 and a Construction Impact Bond of £30,000 as section 106 planning obligation in accordance with Policy A1.
- 12.12 In order to manage the impact of the construction works on neighbours, the Legal Agreement requires the developer to set up a Construction Working Group and to arrange regular meetings for the duration of the project.
- 12.12 The Council would expect construction vehicle movements to and from the site to be scheduled to avoid peak periods to minimise the impacts of construction on the transport network. This is particularly important due to the location of cycle and pedestrian routes adjacent to the site. The contractor would need to register the works with the Considerate Constructors' Scheme. The contractor would also need to adhere to the CLOCS standard.

#### *Travel planning*

- 12.13 A draft workplace travel plan – for the office component – has been submitted in support of the planning application. This is welcomed as it demonstrates a commitment to encouraging and promoting trips by sustainable modes of transport.

12.14 A Local Level Travel Plan and associated monitoring and measures contribution of £4,881 should be secured as a section 106 planning obligation if planning permission were granted. The Travel Plan would be targeted towards the office use, to encourage staff to make walking, cycling and travel by public transport the natural choice for day-to-day trips.

*Public highway impacts in the vicinity of the site*

12.15 The carriageway and footway directly adjacent to the site on Tottenham Mews is likely to sustain significant damage because of the proposed demolition, excavation and construction works required. The Council would need to undertake remedial works to repair any such damage following completion of the proposed development.

12.16 A highways contribution would need to be secured as a section 106 planning obligation if planning permission is granted. This would allow the Council to repave the carriageway adjacent to the site, provide a new footway along the western frontage of the building and repair any other damage to the public highway in the general vicinity of the site. The highway works would be implemented by the Council's highways contractor on completion of the development. A cost estimate for the highway works has been requested from the Council's Transport Design Team.

*Street lighting - Tottenham Mews*

12.17 There are two streetlights next to the site frontage in Tottenham Mews. In situations where there is a narrow footway, such as that in Tottenham Mews, we expect developers to replace existing street lighting with wall mounted bracket lamps. Camden would take on the liability and maintenance under a legal agreement.

*Transport Summary and conclusions*

12.18 The application is acceptable in transport terms, subject to the following obligations/conditions.

- A section 106 obligation requiring the developer to submit an 'Approval in Principle' (AIP) to our Highways Management Team, prior to commencement, and an associated assessment fee of £1584.01 + VAT. The obligation would only be discharged once an AIP had been approved by our Highways Management Team.
- The development should be subject to a car free agreement and this should be secured by means of a Section 106 Agreement.
- A Delivery, Servicing & Waste Management Plan should be secured by a Section 106 Agreement.
- A CMP, a CMP implementation support contribution of £28,520 and a Construction Impact Bond of £30,000 should all be secured by a section 106 planning obligation.

- A Construction Working Group.
- A Local Level Travel Plan and associated monitoring and measures contribution of £4,881 should be secured as a section 106 planning obligation.
- A highways contribution to secure reinstatement/ repairs as a section 106 planning obligation.

## 13 SUSTAINABLE DESIGN AND CONSTRUCTION

13.1 The Local Plan requires development to incorporate sustainable design and construction measures, to ensure they use less energy through decentralised energy and renewable energy technologies. All developments are expected to reduce their carbon dioxide emissions by following the steps in the energy hierarchy (be lean, be clean and be green) to reduce energy consumption. Policies CC1 and CC2 of the Local Plan require development to minimise the effects of and be resilient to climate change and to meet the highest feasible environmental standards. Developments must achieve a 20% reduction in CO2 emissions through renewable technologies (the 3rd stage of the energy hierarchy) wherever feasible. They are also expected to achieve a BREEAM 'Excellent' rating and minimum credit requirements under Energy (60%), Materials (40%) and Water (60%).

### *Demolition*

13.2 The previous building on the site was demolished in late 2020/ early 2021 under a separate permission in which the carbon cost was assessed.

### *Energy: Be Lean, Be Clean & Be Green*

13.3 An Energy Statement following the hierarchy has been submitted. This demonstrates that the proposal meets the following key CC1/LP policy requirements:

- Zero carbon target reached via carbon offset
- Minimum 35% overall reduction achieved on-site
- Minimum 20% reduction at Be Green, calculated against the previous stage.

13.4 The Energy Strategy sets out how the scheme complies with energy targets in the Be Green and Be Clean categories. In the Be Lean category an updated energy strategy has been provided showing compliance. The Section 106 will ensure that the permission incorporates these measures.

13.5 The proposals do not meet the zero carbon development requirement and therefore a Carbon Offset Contribution should be secured through the s106 legal agreement.

13.6 High efficiency air source heat pumps are proposed for heating which is generally welcomed. As there are no heat networks available in the vicinity to which the development could link there will be no requirement for futureproofed district heat connections in the s106.



- 13.7 An array of 53 south-facing solar PV panels is proposed on the flat roof area which is expected to provide 13,093kWh of energy per annum. Further details are required by condition as well as a requirement that they are installed.
- 13.8 A condition would secure an upper limit of water consumption to 105 litres per person per day plus 5 additional litres for external water use.

#### *Overheating and active cooling*

- 13.9 With all units being through-units, and deck access being a large part of the circulation space, there will be very limited need for active cooling Mechanical Ventilation & Heat Recovery (MVHR). This will only be needed in bathrooms and internal circulation spaces. Apart from this, mechanical ventilation will serve the refuse store on the ground floor and the affordable workspace at ground floor and basement.
- 13.10 Due to the non-domestic areas contributing to less than 500m<sup>2</sup> of the overall development area, policy does not require BREEAM registration.

#### *Energy: Be Seen (Energy monitoring)*

- 13.11 The GLA energy hierarchy includes a new level 'Be Seen' which requires developments to monitor, verify and improve their energy performance during operation. The submitted energy strategy identifies that energy and water consumption to the building will be fully metered as part of a centralised energy management system that monitors both residential and workspace consumption.
- 13.12 Sub-meters within each apartment will measure electricity. The building will circulate Low Temperature Hot Water and each apartment will have a Heat Interface Unit to cater for domestic hot water and space heating. This Unit will also provide each tenant with metering of the service.
- 13.13 On the basis of the assessment above, the proposals are in accordance with policies CC1 and CC2 and are acceptable on sustainable and energy grounds, subject to the following planning obligations and conditions being secured in the event of an approval:
- Sustainability measures to be secured through a S106 sustainability plan
  - Energy provisions to be secured through a S106 Energy Efficiency and Renewables Plan
  - Contribution to Carbon Offset Fund.

## **14 AIR QUALITY**

- 14.1 The Local Plan requires the submission of air quality assessments for developments that could cause harm to air quality. Mitigation measures are expected in developments located in areas of poor air quality.

- 14.2 Policy CC4 (air quality) is clear that the Council will ensure that the impact of development on air quality is mitigated and exposure to poor air quality is reduced in the borough. The Council will take into account the impact of air quality when assessing development proposals, through the consideration of both the exposure of occupants to air pollution and the effect of the development on air quality.
- 14.3 Developments that introduce sensitive receptors such as housing in locations of poor air quality will not be acceptable unless designed to mitigate the impact.

#### *Impacts on local air quality*

- 14.4 The Air Quality Statement was updated with further information during the assessment period following requests from officers and further ventilation details were received. This is supplemented by a Ventilation and Extract Statement. Fresh air ventilation to the office space located on the ground and basement floors will be via a local MVHR unit on the ground floor, connected to intake and extract louvres located along the ground floor elevation. There are no gas boilers or diesel generators proposed as part of the development, hence there will be no exhaust flues. With regard to the residential units, the change in layout to secure dual aspect units was informed by the need to ensure cross-ventilation. However, in addition to this, the internal shared corridors and bathrooms of the units will be provided with mechanical ventilation. The full mechanical ventilation details have not been provided, although the locations have been indicated. As a result, the standard mechanical ventilation details / air intake locations condition is attached.
- 14.5 The development will be provided with heat and hot water by air source heat pumps which will not result in any local emissions to air. This is welcomed in this area of poor air quality. In addition the proposals meet the requirement to be air quality neutral.
- 14.6 The AQA modelling has shown that air quality conditions for future residents of the proposed development are acceptable, with concentrations well below the air quality objectives across the site. This includes the 'Sensitivity Test' results which assumed baseline year (2019) vehicle emissions factors and background concentrations for the future development year.

#### *Construction*

- 14.7 There is a low risk of local nuisance and health concern from dust during construction and demolition and necessary mitigation would be secured through the Construction Management Plan.

## **15 FLOODING AND DRAINAGE**

- 15.1 Camden Local Plan policy CC3 seeks to ensure development does not increase flood risk and reduces the risk of flooding where possible. The NPPF requires all major developments to include Sustainable Urban Drainage Systems (SuDs) unless demonstrated to be inappropriate (as set out in the Ministerial Statement by the Secretary of State on 18 December 2014). Major developments should achieve

greenfield run-off rates wherever feasible. Development should also follow the drainage hierarchy in policy SI13 of the London Plan.

- 15.2 The application site is not in a local flood risk zone or a historically flooded street; therefore, there is no increased surface water risk. The site is also not in a designated area of increased groundwater susceptibility. A flood risk assessment and further details of clarification relating to the micro-drainage run-off (rates and volumes) calculations have been submitted for assessment. The details have been assessed by the Council's Lead Local Flood Authority (LLFA).
- 15.3 The footprint of the development would remain unchanged and remains 100% impermeable. The LLFA officer has confirmed a preference for attenuation of runoff using blue/living roofs, and that subject to such measures, peak surface water discharge of 7.6 litre/sec from the site would be acceptable. This rate of runoff would require a minimum of attenuation volume of 29m<sup>3</sup>. Condition 18 requires details of the rainwater attenuation, with a presumption that at least 29m<sup>3</sup> would be provided in blue/ living roofs. The applicant will need to apply for further prior approval for the surface water discharge to the sewer, since that is where the roof runoff will go as no storage is proposed on site. This will be part of the SuDS condition. Overall, the proposed development has been designed to reduce the risk of flooding on the site and surrounding areas and is acceptable subject to conditions.
- 15.4 A condition would secure evidence that a piling method statement has been agreed with Thames Water, in order to minimise the potential for damage to subsurface sewerage infrastructure.

## 16 **ACCESSIBILITY**

- 16.1 Local Plan policy C6 (Access for all) promotes fair access and for barriers that prevent everyone from accessing facilities and opportunities to be removed. The need for all new development in London to achieve the highest standards of accessible and inclusive design is emphasised in policy D5 (Inclusive Design) of the London Plan.
- 16.2 The proposed building will have step-free access to the ground floor flats (both wheelchair units) and the lobby serving the lift core. The affordable workspace would have step free access via the ground floor entrances and the basement floor would be served by the lift. The lift has capacity to accommodate wheelchairs and cycles to ensure good access for all building users. At ground floor level in the plant/ storage area there would be a dedicated room with space for parking of two mobility scooters.
- 16.3 Apart from the two wheelchair-specific units at ground floor level, all other apartments would meet the M4(2) standard accessibility and adaptability as described in the Design and Access Statement. A condition would secure the units as fully accessible.
- 16.4 On the basis of the above, and subject to the attached condition, the proposal is considered to improve accessibility levels across the site in compliance with policy C6 of the Camden Local Plan.

## 17 COMMUNITY SAFETY

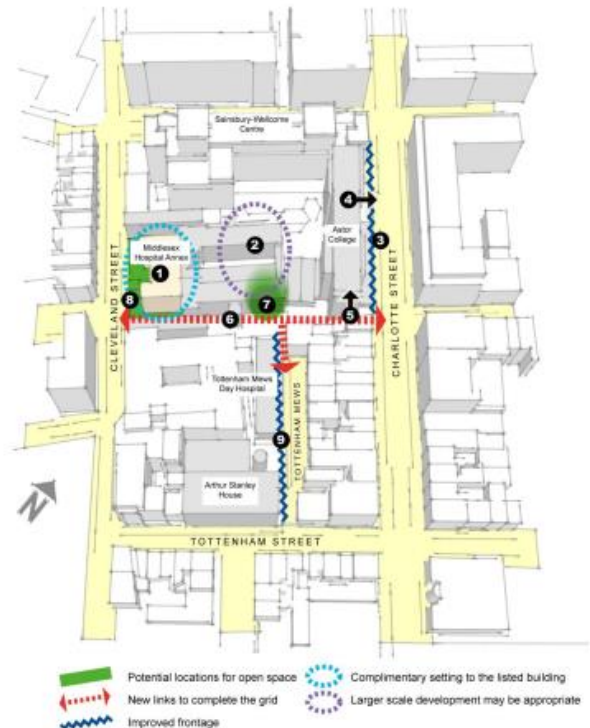
- 17.1 Policy C5 of the Local Plan requires developments to demonstrate that they have incorporated design principles that contribute to community safety and security. The applicant discussed the proposals with the MET Police's Design Out Crime Officer during the pre-application stages and incorporated design features as a result of the feedback.
- 17.2 In general it is considered that the development would be positive from a community safety perspective. The introduction of residential uses to the site will lead to arrivals and departures outside of offices hours and will have a positive impact on the passive surveillance of the area.
- 17.3 Concerns have been raised with regard to the proposed covered route through from Tottenham Mews. The Metropolitan Police commented on the submission, stating that this space would not have natural surveillance, there would be an informal seating opportunity on a window sill of the workspace encouraging anti-social behaviour and criminals would be given an alternative escape route out of the mews. Some of these points were echoed by local residents. The design of the opening has been revised to ensure a minimal reveal with insufficient space to sit on. Detailed design will required by condition 4(b).
- 17.4 Another revision that has been made is that the residential entrance has been moved northward to be closer to the passage. This will ensure greater footfall and activity in this location.
- 17.5 The passage itself would be a short covered area 8.8m in length. The opening from the mews would be 2.5m wide and from the other side 3.6m wide. There would be no recesses or hidden areas and no street furniture or clutter. The passage would be directly overlooked during the hours when the affordable workspace is open. The ground floor arrangement and location of the residential element will help activate this new route.
- 17.6 The permeability and access provided by the link, as well as the uses proposed on site will increase activity and movement in the area. In relation to design, supporting text to Policy C5 at para. 4.89 states "The design of streets, public areas and the spaces between buildings needs to be accessible, safe and uncluttered". Paragraph 4.94 encourages designs to give a "welcoming appearance and enable overlooking of public areas. External security features which obscure the front of buildings such as solid roller shutters can make places seem hostile and unsafe which can discourage pedestrian movement, they will therefore be resisted." The simple uncluttered design will ensure the link feels welcoming and safe.
- 17.7 The introduction of this link is a long term goal as set out in the Fitzrovia Area Action Plan for the masterplanning of the Bedford Passage Sites :

impact of servicing and building services should be minimised (9).

Bedford Passage existing



Bedford Passage illustration of principles



- 17.8 A lighting strategy for this area will be secured by condition as well as a 24 hour right to pass in the section 106 Agreement.
- 17.9 Officers are of the view that the revisions to the application, together with the improved lighting would improve the safety of this link such that overall the proposals would accord with the requirements of policy C5.

**18 LAND CONTAMINATION & ARCHAEOLOGY**

- 18.1 The application is supported by a Geotechnical and Geoenvironmental Interpretative Report which evaluates risks associated with soil conditions on site. This has been reviewed by Environmental Health officers (EHO) for consideration of risk of contamination.
- 18.2 The chemical assessment for the made ground indicates that the concentrations of determinants are below their respective assessment criteria, with the exception of two samples which exceed the GAC for lead.
- 18.3 Of the three made ground samples screened, asbestos was detected in a single sample. The report recommends that precautions must be taken during the groundworks to minimise the risk of fibre release and exposure. It is recommended to wet the

sides/bases of the excavations, particularly in dry weather conditions, and to cover excavated spoil to reduce risk of fibre release. Measures recommended to protect groundworkers and the wider public from potential exposure include dust and vapour suppression methods, covering stockpiles where required and adequate masks and PPE.

- 18.4 The EHOs are satisfied that the contamination risk assessments have been undertaken in accordance with the required risk based approach and generally agree with the conclusions reported. No further details are required by condition.

#### *Asbestos*

- 18.5 Environmental Health officers note the presence of small amounts of asbestos in the ground. The obligations for safe removal of asbestos is addressed by the 'duty to manage' in the Control of Asbestos Regulations 2012.

#### *Radon*

- 18.6 Environmental health officers advise that basements are at increased risk of elevated levels of radon gas regardless of geographic location because more walls as well as the floor are in contact with the ground, and reduced natural ventilation below ground level increases the risk of elevated radon level. At this site approximately half the basement would be occupied by cycle parking and building services, the other half by affordable workspace accommodation which would benefit from mechanical ventilation. Post-completion monitoring would be a requirement under Health & Safety at Work Regulations 1999 and this would be completed as required. Post-occupancy monitoring for radon is therefore required under separate legislation.

#### *Archaeology*

- 18.7 The Historic England Greater London Archaeological Advisory Service (GLAAS) have considered the proposals and looked into the information held in the Greater London Historic Environment Record. There is evidence for quarry pits backfilled with domestic rubbish at the Middlesex Annexe site to the north.
- 18.8 A significant number of burials have been recorded to the immediate north of the site, and although the site is thought to have been outside the burial ground boundary, alterations and underpinning to the boundary wall may have resulted in disarticulated remains extending to within the site. There may also have been earlier workhouse buildings extending onto the site which are not shown on historic mapping.
- 18.9 GLAAS advise that the archaeological interest and/or practical constraints are such that a two-stage archaeological condition is necessary. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation.

## 19 REFUSE & RECYCLING

- 19.1 Policy CC5 of the Local Plan seeks to make Camden a low waste borough. The policy aims to reduce the amount of waste produced in the borough and increase recycling. It also aims to ensure that developments include facilities for the storage and collection of waste and recycling.
- 19.2 The application includes a Waste Management strategy which identifies that waste and recycling provision has been designed to meet Camden guidance (CPG Design and supporting document 'waste storage and arrangements for residential and commercial units'). The proposal includes separate waste and recycling storage facilities for the commercial and residential uses.
- 19.3 Residents will have access to a dedicated waste storage area including bins for general waste, mixed dry recyclables and food recycling. The bin store is accessible via a door onto the mews, the constrained site limiting options for access via internal routes. The waste and recycling storage capacity has been sized to exceed Camden's guidance on storage requirements. Provision of the residential bin store would be secured by condition.
- 19.4 The separate commercial bin store is also accessed from the street only. Commercial waste storage requirements are less defined than residential and the storage is sized to meet volumes arising per employee. The frequency of collection has not been specified but when the development is occupied, the tenant of the commercial element will be able to make arrangements with its commercial waste collection contractor.
- 19.5 Refuse vehicles will be able to stop within Tottenham Mews when collecting material from the bin store. This is the closest available collection point, although it is just outside the 10m recommended travel distance for bin collection. A condition would secure provision of the commercial bin store.
- 19.6 Overall, the proposals for waste and recycling storage are considered to be acceptable.

## 20 ECONOMIC BENEFITS, LOCAL EMPLOYMENT AND PROCUREMENT

- 20.1 The proposed development is of a large scale and it would generate significant local economic benefits and opportunities.
- 20.2 Local Plan policy E1 states that in major developments the Council will seek to secure employment and training opportunities for local residents and opportunities for businesses based in the Borough to secure contracts to provide goods and services.

### *Employment and training obligations*

- 20.3 CPG 2018 acknowledges that businesses bring a number of benefits to their local area. They can provide employment for local people and new business development can benefit the local economy and existing businesses as employees use local shops, facilities and services. Through their support for training and employment opportunities

policy E1 (Economic development) and policy E2 (Employment premises and sites) aim to ensure that the borough's economy will be strong and diverse and that Camden's residents can play a role in this.

- 20.4 The scale of workspace in the proposals is below the threshold for securing end-user employment measures, however the standard construction-related employment opportunities would be secured by s106 legal agreement. Subject to the following requirements being secured by S106, the employment outcomes from the proposals are acceptable in terms of policy E1.

#### *Construction phase*

- Work to CITB benchmarks for local employment when recruiting for construction-related jobs
- Advertise all construction vacancies and work placement opportunities exclusively with the King's Cross Construction Skills Centre for a period of one week before marketing more widely
- Provide a specified number (to be agreed) of construction work placement opportunities of not less than two weeks each, to be undertaken over the course of the development, to be recruited through the Council's King's Cross Construction Skills Centre
- Recruit one construction apprentice per £3 million of build costs and pay the Council a support fee of £1,700 per apprentice. Recruitment of construction apprentices should be conducted through the Council's King's Cross Construction Skills Centre. Recruitment of non-construction apprentices should be conducted through the Council's Economic Development team
- Sign up to the Camden Local Procurement Code
- Provide a local employment, skills and local supply plan setting out a plan for delivering the above requirements in advance of commencing on site

## **21 EQUALITY**

### *Legislation*

- 21.3 Section 149 of the Equality Act 2010 sets out the Public Sector Equality Duty (PSED). A public authority must, in the exercise of its functions, have due regard to the need to:
- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
  - advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
  - foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 21.4 Under the Equalities Act 2010 the nine protected characteristics covered by the general equality duty are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. People with



common protected characteristics are often described as belonging to a protected group.

### *Consideration*

- 21.5 As part of this application officers have considered equalities impacts, particularly on groups with protected characteristics.
- 21.6 No existing function or activity on the application site would be significantly prejudiced or permanently lost by the proposed development. The development itself would not introduce any specific function or feature that favours or disadvantages a specific grouping within the nine protected characteristics nor that discriminates against age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation and therefore a formal Equalities Impact Assessment has not been undertaken by the Council.
- 21.7 Officers are not aware of any specific associations between the existing or proposed use of the site and any group with protected characteristics. As discussed throughout other sections of this Committee Report, it is considered that none of the neighbouring occupiers are unduly harmed or would be threatened by the development, either by the temporary construction works or ongoing use.

## **22 FIRE SAFETY**

- 22.3 Policy D12 (Fire safety) of the London Plan requires all major development proposals to be submitted with a Fire Statement. The applicant has submitted a Fire Safety Strategy.
- 22.4 The submissions suitably address the requirements set out in policy D12 relating to means of escape and safety features.
- 22.5 As the building is over 11m in height measured from access level to the highest occupied floor, there is a requirement to provide automatic water fire suppression (sprinkler) system (AWFSS). Building control officers have confirmed that the Fire Strategy seems well conceived and addresses the relevant fire safety issues for this type of development. The Fire safety proposal for the building are acceptable in principle.
- 22.6 A formal Fire Strategy would therefore be prepared for approval through the Building Regulations process.
- 22.7 Given the emerging weight in the planning process for fire safety, a condition will secure a Fire Statement produced by an independent third party. It would be required to detail the buildings construction methods, products, and materials used; the means of escape for all building users including those who are disabled or require level access together with the associated management plan; access for fire service personnel and equipment; ongoing maintenance and monitoring and how provision would be made within the site to enable fire appliances to gain access to the building. The submitted details would be assessed by the Council's Building Control department.

## **23 COMMUNITY INFRASTRUCTURE LEVY (CIL)**

- 23.3 Since 2012, all developments in London which result in the addition of over 100sq. m GIA floorspace (with exceptions given to affordable housing) have been eligible to pay Mayoral CIL. In February 2019 the Mayor adopted a new charging schedule (MCIL2). MCIL2 came into effect on 1 April 2019 and supersedes MCIL1 and the associated Crossrail Funding SPG.
- 23.4 Final payable contributions would be calculated following approval of the scheme by the Council's CIL officers.

## **24 CONCLUSION**

- 24.3 The development would deliver 23 much needed affordable homes and affordable workspace in a central location. The 23 affordable homes would comprise a mix of tenures and sizes, comprising 10 social rented homes, 4 of which would be large family sized units of 3+ bedrooms. The remaining 13 homes would be 1- or 2- bedroom intermediate rented flats. The quality of amenity of the flats themselves would be very good. The provision of affordable housing is strongly welcomed.
- 24.4 The affordable commercial space would bring opportunities for low cost workspace targeted at knowledge economy uses.
- 24.5 The development would be delivered with an impact on neighbouring amenity that is, on balance considered to be acceptable bearing in mind the overall planning balance, the site history and the wider benefits of the scheme, in particular that it responds to the pressing need for the delivery of self-contained housing and is in accordance with the NPPF which indicates that planning decisions should reflect the outcome of the Housing Delivery Test. A detailed Demolition and Construction Management Plan would accompany the works to ensure construction impact is limited, monitored and controlled.
- 24.6 While the site is in the same ownership as the Network Building, and was identified as being linked in the consultation carried out, the proposal is not dependent for its acceptability on that scheme and should be considered as a standalone application. In summary, 14-19 Tottenham Mews is recommended for approval, irrespective of the outcome of the linked planning application at the Network Building.

## **25 RECOMMENDATION**

- 25.3 Grant conditional Planning Permission following completion of Section 106 Legal Agreement covering the following Heads of Terms:**

### **Commercial space**

- **Affordable workspace:**
  - Management & Marketing Strategy

- Fitted out for occupation at no cost to the occupier
- 50% discount on market rents for 10 years

### **Housing**

- **On-site affordable housing :**
  - 10 homes at London Affordable Rent levels as specified, or target Social Rent levels
  - 13 homes for Intermediate Rent
  - Details of service charge

### **Highways/transport**

- **Car-free development** - covering commercial and residential components
- **Public Highway Impacts contribution of £34,890**
- **Approval In Principle to excavate next to the highway** (with assessment fee of £1584.01 + VAT)
- **Travel Plan for employment element** (with monitoring contribution of £4881)
- **Delivery Service and Waste Management Plan**
- **Construction Management Plan (CMP)**
- **Community Working Group**
- **CMP implementation support contribution of £28,520**
- **Construction Impact Bond - £30,000**

### **Design**

- **Retention of Architect** - throughout the construction period

### **Open Space**

- **Public Open Space Contribution** : financial contribution of £101,182.50
- **24 hour right to pass** for Bedford Passage link

### **Environmental**

- **Carbon Offset Contribution** – £22,973
- **Energy and Sustainability Strategy** – Securing Be Lean, Be Clean, Be Green measures

### **Employment**

- **Employment and Training Plan**

## 26 LEGAL COMMENTS

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

## 27 CONDITIONS

1	<p>The development hereby permitted must be begun not later than the end of three years from the date of this permission.</p> <p><b>Reason:</b> In order to comply with the provisions of Section 91 of the Town and Country Planning Act 1990 (as amended).</p>
2	<p><b>Approved Plans</b></p> <p>The development hereby permitted shall be carried out in accordance with the following approved plans:</p> <p>Existing Drawings:</p> <p>13565-A-L01-01-001; 002; 100; 101; 200 A; 201; 300; 301; 302; 303.</p> <p>Proposed Drawings:</p> <p>13565-A-B01-03-099 A; 100 A; 101 A; 102 A; 103 A; 104 A; 105 A; 106 A; 200 A; 201 A; 203 A; 300 A; 301 A; 302 A; 303 A.</p> <p>Supporting Documents:</p> <p>Energy Statement by TFT Revision 02 dated 27 May 2021; Sustainability Statement by TFT dated 24/11/2020; Preliminary Ecological Appraisal by The Ecology Consultancy dated 11/11/2020; Plant Noise Assessment Report, ref 27931 dated 12 October 2020; Environmental Noise Survey and Acoustic Design Statement Report ref. 27931/ADS1.Rev1 dated 12 November 2020; Air Quality Assessment by Air Quality Consultants dated November 2020; Transport Statement by Caneparo Associates dated November 2020; Travel Plan by Caneparo Associates dated November 2020; Delivery, Servicing and Waste Management Plan by Caneparo Associates dated November 2020; Archaeological Desk Based Study by Andrew Francis, dated 16/11/2020; Daylight and Sunlight Report by Point2 dated 25/11/2020; Daylight/ Sunlight letter from Point2 Consultancy dated 18<sup>th</sup> of May 2021; Internal Daylight Summary letter from Point2 Consultancy dated 19<sup>th</sup> of May 2021; Fire Strategy by Norman Disney &amp; Young Revision 2.0 dated 5 November 2020; Ventilation and Extract Statement by Norman Disney &amp; Young Revision 3.0 dated 14<sup>th</sup> May 2021; Affordable Housing Statement by DS2 LLP dated May 2021; Inclusive Design and Access Statement by Proudlock Associates dated 25-11-2020; Email at 14:05 on May 17 2021 from Hannah Willock setting out Affordable Workspace Terms; Geotechnical and Geoenvironmental Interpretative Report by CGL dated September 2020; Structural Engineering Report and Subterranean Construction Method Statement by Elliott Wood dated 13<sup>th</sup> November 2020; Surface Water Drainage Statement by Elliot Wood dated 13<sup>th</sup> November 2020.</p> <p><b>Reason:</b> For the avoidance of doubt and in the interest of proper planning.</p>

3	<p><b>Window and terrace screens</b></p> <p>Prior to the commencement of the relevant works, details of the privacy measures to be installed on the windows on the north elevations at levels 1 to 5 shall be submitted to and approved in writing by the local planning authority.</p> <p>These measures shall include details of screening on the northern side of the roof terrace at 5<sup>th</sup> floor level.</p> <p>All such measures shall be fitted prior to first occupation of the relevant residential units and shall be retained permanently thereafter.</p> <p><b>Reason:</b> In order to prevent unreasonable overlooking of neighbouring premises in accordance with the requirements of Policies D1 and A1 of the Camden Local Plan 2017.</p>
4	<p><b>Building design details</b></p> <p>Prior to commencement of the relevant works, detailed drawings, or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the local planning authority:</p> <ul style="list-style-type: none"> <li>a) Details including sections at 1:10 of typical windows (including jambs, head and cill), railings to Juliet balconies, patterned ventilation grilles/panels and external doors;</li> <li>b) Plan, elevation and section drawings, of the ground floor commercial entrance and window onto covered link at a scale of 1:10</li> <li>c) Typical plan, elevation and section drawings of balustrading and drainage to access decks;</li> <li>d) Manufacturer's specification details or samples (as appropriate) of all facing materials;</li> <li>e) Sample panel of each of the proposed brick finishes showing the colour, texture, face-bond and pointing and typical elevation including a glazed opening showing reveal and header detail;</li> <li>f) Details of recesses at street level;</li> <li>g) Details of all finishes and materials used in covered link to Bedford Passage;</li> <li>h) Details of string courses and lintels;</li> <li>i) Details of rooftop plant enclosure, including details of the door from the access deck to the plant room at fifth floor level.</li> </ul>

	<p>The relevant works shall be carried out in accordance with the details thus approved and all approved samples shall be retained on site during construction of the relevant works for the building.</p> <p><b>Reason:</b> In order to safeguard the appearance of the buildings and the character and appearance of the wider area and to create a safer and more secure environment around the site in accordance with the requirements of Policies D1, D2, D3 and C5 of the Camden Local Plan 2017.</p>
5	<p><b>Internal noise levels</b></p> <p>The design and structure of the development shall be of such a standard that it will protect residents within the same building or in adjoining buildings from noise and vibration from the development, so that they are not exposed to noise levels indoors of more than 35 dB LAeq 16 hrs daytime and of more than 30 dB LAeq 8 hrs in bedrooms at night.</p> <p><b>Reason:</b> To safeguard the amenities of neighbouring noise sensitive receptors in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.</p>
6	<p><b>Residential refuse storage</b></p> <p>Prior to first occupation of the flats, the refuse and recycling facilities hereby approved shall be provided and made available for use by the occupants.</p> <p>The facilities shall be permanently retained thereafter.</p> <p><b>Reason:</b> To ensure that sufficient provision for the storage and collection of waste has been made, to avoid obstruction of the highway and to safeguard amenities of adjacent premises in accordance with the requirements of policy CC5, A1, and A4 of the Camden Local Plan 2017.</p>
7	<p><b>Noise levels from Commercial</b></p> <p>Noise levels emitted from the use of the commercial unit at ground and basement levels shall be as follows:</p> <p>Between 07:00 and 23:00 hours</p> <ol style="list-style-type: none"> <li>1. The A-weighted equivalent continuous noise level (LAeq) emanating, as measured one metre from any facade of any noise sensitive premises over a 5 minute period when the premises are in use, shall not increase by more than 5dB as compared to the same measure, from the same position and over a comparable period with the premises not in use.</li> <li>2. The unweighted equivalent noise level (Leq) in the 63Hz Octave band, measured using the "fast" time constant, inside any living room of any noise</li> </ol>

	<p>sensitive premises, with the windows open or closed, over any five minute period with the development in use, should show no increase as compared to the same measure, from the same location(s) and over a comparable period with the development is not in use</p> <p><b>Reason:</b> To safeguard the amenities of neighbouring noise sensitive receptors in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.</p>
8	<p><b>Residential cycle parking</b></p> <p>Prior to first occupation of the residential units, the 45 secure cycle parking spaces, shall be installed and made available for the residents, in accordance with the plans and Transport Statement hereby approved.</p> <p>The approved facilities shall be retained and maintained thereafter.</p> <p><b>Reason:</b> To ensure the development provides adequate cycle parking facilities in accordance with the requirements of Policy T1 of the Camden Local Plan 2017.</p>
9	<p><b>Commercial cycle parking</b></p> <p>Prior to first occupation of the commercial unit, the 6 secure cycle parking spaces shall be installed and made available for the users of the unit, in accordance with the plans and Transport Statement hereby approved.</p> <p>The approved facilities shall be retained and maintained thereafter.</p> <p><b>Reason:</b> To ensure the development provides adequate cycle parking facilities in accordance with the requirements of Policy T1 of the Camden Local Plan 2017.</p>
10	<p><b>External fixtures</b></p> <p>No lights, meter boxes, flues or pipes, and no telecommunications equipment, alarm boxes, man-safe rails, television aerials or satellite dishes shall be fixed or installed on the external face of the buildings.</p> <p><b>Reason:</b> In order to safeguard the appearance of the buildings and the character and appearance of the wider area in accordance with the requirements of Policies D1 and D2 of the Camden Local Plan 2017.</p>
11	<p><b>Water consumption</b></p> <p>The development hereby approved shall achieve a maximum water use of 105litres/person/day (includes 5 litres for external use). The dwelling/s shall not</p>

	<p>be occupied until the Building Regulation optional requirement has been complied with.</p> <p><b>Reason:</b> To ensure the development contributes to minimising the need for further water infrastructure in an area of water stress in accordance with Policies CC1, CC2 (Adapting to climate change), CC3 of the London Borough of Camden Local Plan 2017.</p>
12	<p><b>Drainage strategy</b></p> <p>Prior to commencement of development], full details of the sustainable drainage system including at least 29m<sup>3</sup> of blue roof shall be submitted to and approved in writing by the local planning authority.</p> <p>The details to include (as necessary) a revised drainage statement, SuDS pro-forma and supporting evidence.</p> <p>Such a system should be designed to accommodate all storms up to and including a 1:100 year storm with a 40% provision for climate change such that flooding does not occur in any part of a building or in any utility plant susceptible to water, and shall demonstrate the run off rates approved by the Local Planning Authority.</p> <p>The details shall include the proposed lifetime maintenance plan for each element.</p> <p>All such systems shall thereafter be retained and maintained in accordance with the approved details.</p> <p><b>Reason:</b> To reduce the rate of surface water run-off from the buildings and limit the impact on the storm-water drainage system in accordance with Policies CC1, CC2, CC3 of the London Borough of Camden Local Plan 2017.</p>
13	<p><b>Living roof</b></p> <p>Prior to commencement of the building superstructure, full details in respect of the green roof as shown on the approved roof plan, shall be submitted to and approved in writing by the local planning authority.</p> <p>The details shall include the following:</p> <ul style="list-style-type: none"> <li>a. Detailed maintenance plan</li> <li>b. Details of its construction and the materials used</li> </ul>



	<ul style="list-style-type: none"> <li>c. A section at a scale of 1:20 showing substrate depth averaging 130mm with added peaks and troughs to provide variations between 80mm and 150mm and</li> <li>d. Full planting details including species showing planting of at least 16 plugs per m2.</li> <li>e. Consideration of relationship between photovoltaic panels and habitat creation</li> </ul> <p>The development buildings shall not be implemented other than in accordance with the details as approved and the green roof shall be permanently retained and maintained thereafter in accordance with the approved scheme of maintenance.</p> <p>[Guidance on living roofs is available in the Camden Biodiversity Action Plan: Advice Note on Living Roofs and Walls.]</p> <p><b>Reason:</b> In order to ensure the development undertakes reasonable measures to take account of biodiversity and the water environment in accordance with policies A3 and CC3 of the Camden Local Plan 2017.</p>
14	<p><b>Bird Boxes</b></p> <p>Prior to completion of the superstructure of the building, plans and elevations showing details of bird box locations and types, indication of species to be accommodated, and a maintenance methodology for annual cleaning, repair/replacement of the installed boxes, prepared in accordance with the recommendations of para 4.21 of the Preliminary Ecological Appraisal as approved, shall be submitted to and approved in writing by the local planning authority.</p> <p>The boxes shall be installed in accordance with the approved plans prior to the occupation of the relevant building and thereafter retained and maintained in accordance with the approved maintenance methodology.</p> <p><b>Reason:</b> In order to secure appropriate features to conserve and enhance wildlife habitats and biodiversity measures within the development, in accordance with the requirements of Policy A3 of the Camden Local Plan 2017.</p>
15	<p><b>Piling Method Statement</b></p> <p>No piling shall take place until a letter from Thames Water (or the relevant statutory undertaker) confirming that agreement has been reached with the</p>

	<p>developer on the piling method statement for the development, has been submitted to and approved in writing by the local planning authority.</p> <p>The piling method statement shall detail the depth and type of piling to be undertaken, the equipment to be used, 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.</p> <p>All piling carried out as part of the development must be undertaken in accordance with the terms of the agreed piling method statement.</p> <p><b>Reason:</b> To safeguard the existing public sewer infrastructure, controlled waters and the structural stability of the neighbouring structures, in accordance with the requirements of policies A5 and CC3 of the Camden Local Plan 2017.</p>
16	<p><b>Archaeology</b></p> <p>Prior to the commencement of development a programme of archaeological investigation including the details of the suitably qualified investigating body to carry out such archaeological works as required shall be submitted to and approved in writing by the local planning authority. The development shall then only take place in accordance with such details as have been approved.</p> <p><b>Reason:</b> Important archaeological remains may exist on this site. Accordingly the Local planning authority wishes to secure the provision of archaeological investigation and the subsequent recording of the remains prior to development in accordance with the requirements of policy D2 of the London Borough of Camden Local Plan 2017.</p>
17	<p><b>Construction machinery</b></p> <p>All non-Road mobile Machinery (any mobile machine, item of transportable industrial equipment, or vehicle - with or without bodywork) of net power between 37kW and 560kW used on the site for the entirety of the demolition and construction phase of the development hereby approved shall be required to meet Stage IIIA of EU Directive 97/68/EC. The site shall be registered on the NRMM register for the demolition and construction phase of the development.</p> <p><b>Reason:</b> To safeguard the amenities of the adjoining occupiers, the area generally and contribution of developments to the air quality of the borough in accordance with the requirements of Policies A1, A4 and CC4 of the Camden Local Plan 2017.</p>
18	<p><b>Lighting strategy</b></p>

	<p>Prior to commencement of the relevant part, a lighting strategy for the exterior of the building shall be submitted to and approved in writing by the local planning authority.</p> <p>This shall include details of the lighting to the covered link to Bedford Passage.</p> <p>All such features shall be fitted prior to first occupation of the development and shall be retained permanently thereafter.</p> <p><b>Reason:</b> To maintain a high quality of amenity and a safe environment, in accordance with Policies D1 and A3 of the Camden Local Plan 2017.</p>
19	<p><b>Photovoltaic panels</b></p> <p>Prior to completion of the building superstructure, drawings and data sheets showing the location, extent and predicted energy generation of no less than 13,093kw/Annum of photovoltaic cells and associated equipment to be installed on the building shall have be submitted to and approved by the Local Planning Authority in writing.</p> <p>The measures shall include the installation of a meter to monitor the energy output from the approved renewable energy systems. A site-specific lifetime maintenance schedule for each system, including safe roof access arrangements, shall be provided. The cells shall be installed in full accordance with the details approved by the Local Planning Authority and permanently retained and maintained thereafter.</p> <p><b>Reason:</b> To ensure the development provides adequate on-site renewable energy facilities in accordance with the requirements of Policies CC1 (Climate change mitigation) and CC2 (Adapting to climate change) of the London Borough of Camden Local Plan 2017.</p>
20	<p><b>Wheelchair homes</b></p> <p>Two no. 2b4p flats at ground floor shall be designed and constructed in accordance with Building Regulations Part M4(3)(2)(b).</p> <p>All other flats shall be designed and constructed in accordance with Building Regulations Part M4(2).</p> <p><b>Reason:</b> To ensure that the wheelchair units would be capable of providing adequate amenity in accordance with Policy H6 of the Camden Local Plan 2017.</p>
21	<p><b>Basement engineer</b></p>

	<p>The development hereby approved shall not commence until such time as a suitably qualified chartered engineer with membership of the appropriate professional body has been appointed to inspect, approve and monitor the critical elements of both permanent and temporary basement construction works throughout their duration to ensure compliance with the design which has been checked and approved by a building control body. Details of the appointment and the appointee's responsibilities shall be submitted to and approved in writing by the local planning authority prior to the commencement of development. Any subsequent change or reappointment shall be confirmed forthwith for the duration of the construction works.</p> <p><b>Reason:</b> To safeguard the appearance and structural stability of neighbouring buildings and the character of the immediate area in accordance with the requirements of Policies D1 and A5 of the London Borough of Camden Local Plan 2017.</p>
22	<p><b>BIA compliance</b></p> <p>The development shall not be carried out other than in accordance with the methodologies, recommendations and requirements of the Basement Impact Assessment Report (BIA) prepared hereby approved including the Building Damage Assessment that the damage to neighbouring structures will not exceed Burland Category 1 (Very Slight).</p> <p><b>Reason:</b> To safeguard the appearance and structural stability of neighbouring buildings and the structural, ground and water conditions of the general area in accordance with the requirements of policy A5 of the London Borough of Camden Local Plan 2017.</p>
23	<p><b>Energy monitoring</b></p> <p>In order to demonstrate compliance with the 'be seen' post-construction monitoring requirement of Policy SI 2 of the London Plan, the legal Owner shall at all times and all in all respects comply with the energy monitoring requirements set out in points a, b and c below. In the case of non-compliance the legal Owner shall upon written notice from the Local Planning Authority immediately take all steps reasonably required to remedy non-compliance.</p> <ul style="list-style-type: none"> <li>a. Prior to implementation, accurate and verified estimates of the 'be seen' energy performance indicators for the consented development, (as outlined in Chapter 3 'Planning stage' of the GLA 'Be seen' energy monitoring guidance document), shall be submitted to the GLA's monitoring portal in accordance with the 'Be seen' energy monitoring guidance.</li> <li>b. Prior to first occupation, updated accurate and verified estimates of the 'be seen' energy performance indicators for each reportable unit of the development, (as per the methodology outlined in Chapter 4 'As-built</li> </ul>

	<p>stage' of the GLA 'Be seen' energy monitoring guidance), shall be uploaded to the GLA's monitoring portal. The submission shall also confirm that suitable monitoring devices have been installed and maintained for the monitoring of the in-use energy performance indicators, as outlined in Chapter 5 'In-use stage' of the GLA 'Be seen' energy monitoring guidance document.</p> <p>c. Upon completion of the first year of occupation following the end of the defects liability period (DLP) and for the following four years, the legal Owner is required to provide accurate and verified annual in-use energy performance data for all relevant indicators under each reportable unit of the development as per the methodology outlined in Chapter 5 'In-use stage' of the GLA 'Be seen' energy monitoring guidance document. All data and supporting evidence should be uploaded to the GLA's monitoring portal. This condition will be satisfied after the legal Owner has reported on all relevant indicators included in Chapter 5 'In-use stage' of the GLA 'Be Seen' energy monitoring guidance document for at least five years.</p> <p><b>Reason:</b> In order to ensure that actual operational energy performance is minimised and demonstrate compliance with the 'be seen' post-construction monitoring requirement of Policy SI 2 of the London Plan.</p>
24	<p><b>Fire Statement</b></p> <p>No work shall commence to the building envelope/facades until a Fire Statement has been submitted to and approved in writing by the Local Planning Authority.</p> <p>The Fire Statement shall be produced by an independent third party suitably qualified assessor which shall detail the building's construction, methods, products and materials used; the means of escape for all building users including those who are disabled or require level access together with the associated management plan; access for fire service personnel and equipment; ongoing maintenance and monitoring and how provision will be made within the site to enable fire appliances to gain access to the building.</p> <p>The development shall be implemented in accordance with the approved details.</p> <p><b>Reason:</b> In order to provide a safe and secure development in accordance with policy D12 of the London Plan 2021</p>
25	<p><b>Air Source Heat Pumps</b></p>

	<p>Prior to completion of the superstructure, details, drawings and data sheets showing the location, performance and Be Green stage carbon saving of the air source heat pumps and associated equipment to be installed on the building, shall have been submitted to and approved by the Local Planning Authority in writing.</p> <p>The measures shall include the installation of a metering details including estimated costs to occupants and commitment to monitor performance of the system post construction. A site-specific lifetime maintenance schedule for each system, including safe access arrangements, shall be provided. The equipment shall be installed in full accordance with the details approved by the Local Planning Authority and permanently retained and maintained thereafter.</p> <p><b>Reason:</b> To ensure the development provides adequate on-site renewable energy facilities in accordance with the requirements of policy CC1 of the London Borough of Camden Local plan Policies</p>
26	<p><b>Commercial refuse storage</b></p> <p>Prior to first occupation of the affordable workspace, the refuse and recycling facilities hereby approved shall be provided and made available for use by the occupants.</p> <p>The facilities shall be permanently retained thereafter.</p> <p><b>Reason:</b> To ensure that sufficient provision for the storage and collection of waste has been made, to avoid obstruction of the highway and to safeguard amenities of adjacent premises in accordance with the requirements of policy CC5, A1, and A4 of the Camden Local Plan 2017.</p>
27	<p><b>Mechanical Ventilation</b></p> <p>Prior to the first use of the premises for the use hereby permitted, full details of a scheme for ventilation, including manufacturers specifications, noise levels and attenuation, shall be submitted to and approved by the Local Planning Authority in writing. The use shall not proceed other than in complete accordance with such scheme as has been approved. All such measures shall be retained and maintained in accordance with the manufacturers' recommendations.</p> <p><b>Reason:</b> To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies G1 and A1 of the London Borough of Camden Local Plan 2017.</p>

28	<p><b>Noise Levels</b></p> <p>Noise levels at a point 1 metre external to sensitive facades shall be at least 10dB(A) less than the existing background measurement (LA90), expressed in dB(A) when all plant/equipment (or any part of it) is in operation unless the plant/equipment hereby permitted will have a noise that has a distinguishable, discrete continuous note (whine, hiss, screech, hum) and/or if there are distinct impulses (bangs, clicks, clatters, thumps), then the noise levels from that piece of plant/equipment at any sensitive façade shall be at least 15dB(A) below the LA90, expressed in dB(A).</p> <p>Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.</p>
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## 28 INFORMATIVES

1	<p>Your proposals may be subject to control under the Building Regulations and/or the London Buildings Acts that cover aspects including fire and emergency escape, access and facilities for people with disabilities and sound insulation between dwellings. You are advised to consult the Council's Building Control Service, Camden Town Hall, Judd St, Kings Cross, London NW1 2QS (tel: 020-7974 6941).</p>
2	<p>Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. You are advised to consult the Council's Noise and Licensing Enforcement Team, Camden Town Hall, Judd St, Kings Cross, London NW1 2QS (Tel. No. 020 7974 4444 or search for 'environmental health' on the Camden website or seek prior approval under Section 61 of the Act if you anticipate any difficulty in carrying out construction other than within the hours stated above.</p>
3	<p>This proposal may be liable for the Mayor of London's Community Infrastructure Levy (CIL) and the Camden CIL. Both CILs are collected by Camden Council after a liable scheme has started, and could be subject to surcharges for failure to assume liability or submit a commencement notice PRIOR to commencement. We issue formal CIL liability notices setting out how much you may have to pay once a liable party has been established. CIL payments will be subject to indexation in line with construction costs index. You can visit our planning website at <a href="http://www.camden.gov.uk/cil">www.camden.gov.uk/cil</a> for more information, including guidance on your liability, charges, how to pay and who to contact for more advice.</p>

4	<p>This approval does not authorise the use of the public highway. Any requirement to use the public highway, such as for hoardings, temporary road closures and suspension of parking bays, will be subject to approval of relevant licence from the Council's Streetworks Authorisations &amp; Compliance Team London Borough of Camden 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No 020 7974 4444) . Licences and authorisations need to be sought in advance of proposed works. Where development is subject to a Construction Management Plan (through a requirement in a S106 agreement), no licence or authorisation will be granted until the Construction Management Plan is approved by the Council.</p>
5	<p>All works should be conducted in accordance with the Camden Minimum Requirements - a copy is available on the Council's website at <a href="https://beta.camden.gov.uk/documents/20142/1269042/Camden+Minimum+Requirements+%281%29.pdf/bb2cd0a2-88b1-aa6d-61f9-525ca0f71319">https://beta.camden.gov.uk/documents/20142/1269042/Camden+Minimum+Requirements+%281%29.pdf/bb2cd0a2-88b1-aa6d-61f9-525ca0f71319</a></p> <p>or contact the Council's Noise and Licensing Enforcement Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No. 020 7974 4444)</p> <p>Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. You must secure the approval of the Council's Noise and Licensing Enforcement Team prior to undertaking such activities outside these hours.</p>
6	<p>If a revision to the postal address becomes necessary as a result of this development, application under Part 2 of the London Building Acts (Amendment) Act 1939 should be made to the Camden Contact Centre on Tel: 020 7974 4444 or Environment Department (Street Naming &amp; Numbering) Camden Town Hall, Argyle Street, WC1H 8EQ.</p>
7	<p>Your attention is drawn to the fact that there is a separate legal agreement with the Council which relates to the development for which this permission is granted. Information/drawings relating to the discharge of matters covered by the Heads of Terms of the legal agreement should be marked for the attention of the Planning Obligations Officer, Sites Team, Camden Town Hall, Argyle Street, WC1H 8EQ.</p>
9	<p>The correct street number or number and name must be displayed permanently on the premises in accordance with regulations made under Section 12 of the London Building (Amendments) Act 1939.</p>
10	<p>You are reminded of the need to provide adequate space for internal and external storage for waste and recyclables. For further information contact Council's Environment Services (Waste) on 020 7974 6914/5 or see the website</p>



	<a href="http://www.camden.gov.uk/ccm/content/environment/waste-and-recycling/twocolumn/new-recycling-rubbish-and-reuse-guide.en">http://www.camden.gov.uk/ccm/content/environment/waste-and-recycling/twocolumn/new-recycling-rubbish-and-reuse-guide.en</a> .
11	You are advised the developer and appointed / potential contractors should take the Council's guidance on Construction Management Plans (CMP) into consideration prior to finalising work programmes and must submit the plan using the Council's CMP pro-forma; this is available on the Council's website at <a href="https://beta.camden.gov.uk/web/guest/construction-management-plans">https://beta.camden.gov.uk/web/guest/construction-management-plans</a> or contact the Council's Planning Obligations Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No. 020 7974 4444). No development works can start on site until the CMP obligation has been discharged by the Council and failure to supply the relevant information may mean the council cannot accept the submission as valid, causing delays to scheme implementation. Sufficient time should be afforded in work plans to allow for public liaison, revisions of CMPs and approval by the Council.
12	Your proposals may be subject to control under the Party Wall etc Act 1996 which covers party wall matters, boundary walls and excavations near neighbouring buildings. You are advised to consult a suitably qualified and experienced Building Engineer.
14	The Council supports schemes for the recycling of bottles and cans and encourages all hotels, restaurants, wine bars and public houses to do so as well. Further information can be obtained by telephoning the Council's Environment Services (Recycling) on 0207 974 6914/5 or on the website <a href="http://www.camden.gov.uk/ccm/content/environment/waste-and-recycling/twocolumn/new-recycling-rubbish-and-reuse-guide.en">http://www.camden.gov.uk/ccm/content/environment/waste-and-recycling/twocolumn/new-recycling-rubbish-and-reuse-guide.en</a> .
15	This permission is granted without prejudice to the necessity of obtaining consent under the Town and Country Planning (Control of Advertisements) (England) Regulations 2007. Application forms may be obtained from the Council's website, <a href="http://www.camden.gov.uk/planning">www.camden.gov.uk/planning</a> or the Camden Contact Centre on Tel: 020 7974 4444 or email <a href="mailto:env.devcon@camden.gov.uk">env.devcon@camden.gov.uk</a> ).
16	Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.
17	Thames Water requests that the development should incorporate protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. Any discharge made without a permit is deemed

	<p>illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing <a href="mailto:wwriskmanagement@thameswater.co.uk">wwriskmanagement@thameswater.co.uk</a>. Application forms should be completed on line via <a href="http://www.thameswater.co.uk">www.thameswater.co.uk</a>. Please refer to the Wholesale; Business customers; Groundwater discharges section</p>
18	<p>A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing <a href="mailto:trade.effluent@thameswater.co.uk">trade.effluent@thameswater.co.uk</a> . Application forms should be completed on line via <a href="http://www.thameswater.co.uk">www.thameswater.co.uk</a>. Please refer to the Wholesale; Business customers; Groundwater discharges section.</p>