

# PLANNING STATEMENT

OCTOBER 2024

# JAMESTOWN ROAD

**Jamestown Road**

# Planning Statement

**October 2024**

**DP9 Ltd**

DP9 Ltd  
100 Pall Mall  
London  
SW1Y 5NQ



## Executive Summary

Camden is home to a rich mix of uses and vibrant history and local community. As Camden grows, the community and the Council have come together in new and inspiring ways to tackle some of the most pressing issues facing the borough. “We Make Camden” is the Council’s updated vision for the Borough centred around six key ambitions:-

- 1) Camden is a Borough where every child has the best start in life
- 2) Camden’s local economy should be strong, sustainable, and inclusive – everyone should have a secure livelihood to support them to live a prosperous life
- 3) Camden actively tackles injustice and inequality, creating safe, strong and open communities where everyone can contribute
- 4) Camden communities support good health, wellbeing and connection for everyone so that they can start well, live well, and age well;
- 5) Everyone in Camden should have a place they call home; Camden should be a green, clean, vibrant, accessible, and sustainable place with everyone empowered to contribute to tackling the climate emergency

The Proposed Development is considered to fully align with the We Make Camden vision through the provision of on-site self-contained affordable housing with new open spaces, and rejuvenation of this brownfield Site, alongside retention of employment floorspace and local training opportunities.

Regal have been appointed by the Applicant as development manager and delivery partner for the transformation of the existing site which was purchased the site when Camden disposed of the asset in 2021.

Regal are one of the capital’s leading privately owned mixed-use developers with a focus on unlocking value from complex urban settings to transform London’s landscape. Regal has delivered successful developments across London over the last 25 years, from Brent to Tower Hamlets, Barnet to Lambeth.

The Proposed Development would bring forward much needed housing on a vacant, brownfield site with an emerging allocation. It would transform these dilapidated buildings to deliver a mix of purpose built student accommodation and affordable housing along with employment floorspace.

The proposals for Jamestown Road will deliver substantial and demonstrable public benefits including:-

- Transformation of a brownfield site for new student accommodation and affordable housing, providing high quality accommodation for London’s growing number of students, and much needed affordable homes;
- Provide 187 student rooms, and 27 affordable homes in the form of high priority unit sizes, equal to delivery of 102 housing units per the Government Housing Delivery Test;



- Provide exemplar design quality for the residents and students, centred around two courtyards for private amenity space. The development will enhance the streetscape through high quality architectural design which is highly response to context.
- Retention a portion of flexible commercial space to contribute to the local economy;
- Removal of all car travel to the Site with a focus on cycle facilities, and implement measures to secure a sustainable mode shift towards active travel, including regularising deliveries and servicing;
- Highly sustainable development, achieving carbon emissions reductions and BREEAM “Excellent” for the student accommodation.

It is considered that the proposals are in full accordance with the development plan, and in line with Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended), there are no material considerations that indicate that planning permission for the Proposed Development should not be granted.



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## 1. Introduction

- 1.1 This Planning Statement has been prepared by DP9 Limited in support of an application for full planning permission, submitted on behalf 4C - Jamestown Road Ltd (the “Applicant”) for the development site of 33-35 Jamestown Road, London, NW1 7DB and 211 Arlington Road London NW1 7HD (the “Site”).
- 1.2 Full planning permission is sought for the Proposed Development:-  
  
*“Demolition of existing buildings and structures to facilitate the creation of a new building comprising basement, ground plus seven storey building for a mix of Purpose Built Student Accommodation (Sui Generis), flexible commercial (Class E) and Residential (Class C3) uses with ancillary plant, courtyards, access, hard and soft landscaping, cycle parking, highway works and all other works associated with the development.”*
- 1.3 The Proposed Development would bring forward much needed housing on a vacant, brownfield site with an emerging allocation. It would transform these vacant, dilapidated buildings to deliver a mix of purpose built student accommodation and affordable housing.
- 1.4 Regal have been appointed by the Applicant as development manager and delivery partner for the transformation of the existing site which was purchased the site when Camden disposed of the asset in 2021.
- 1.5 Regal are one of the capital’s leading privately owned mixed-use developers with a focus on unlocking value from complex urban settings to transform London’s landscape. Regal has delivered successful developments across London over the last 25 years, from Brent to Tower Hamlets, Barnet to Lambeth.
- 1.6 Regal’s developments are characterised by bespoke design and exceptional quality and are built to unlock value, enhance the local environment, and respect and engage local communities.
- 1.7 Unlike many other developers, Regal is a fully integrated business operating across all stages of the development process from land acquisition and the planning and design stages through to physical project completion. This also means that as both the developer and contractor, Regal has delivered every project for which it has secured planning permission for over its 25 year plus history. Within the local area, following unanimous approval at planning committee in September 2024, Regal are due to begin works at 100 Chalk Farm Road later this year.
- 1.8 Regal is committed to playing its part in tackling the climate crisis, and to delivering better outcomes for the environment and its local communities through creating positive social value. Regal's sustainability strategy focusses on four areas: transitioning to net zero carbon; investing in innovation; going beyond biodiversity net gain and helping disadvantaged groups into employment in real estate and construction through Regal Academies.



- 1.9 This Statement provides an assessment of the Proposed Development against Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) which requires that planning applications must be determined in accordance with the development plan unless any material considerations indicate otherwise. The development plan for the site comprises:-
- The London Plan, published in March 2021 (the “London Plan”); and
  - The Camden Local Plan, adopted in July 2017 (the “Local Plan”).
- 1.10 The National Planning Policy Framework (“NPPF”), published in December 2023 along with emerging policy, having regard to Paragraph 48 of the NPPF, and supplementary planning guidance are all material considerations. This includes the draft new Camden Local Plan, which concluded Regulation 18 Consultation in March 2024. Regal have made detailed representations in relation to the draft new Local Plan, the Site and their other assets within Camden.
- 1.11 Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) place a statutory duty on Local Planning Authorities to have special regard to the desirability of preserving listed buildings and their settings.
- 1.12 This Statement assesses the relevant planning considerations associated with the proposed development and considers the development in the context of national, regional and local planning policy and guidance. It should be read in conjunction with the plans and drawings submitted as part of the application. In addition to this Planning Statement, the planning application is accompanied by the following documents:-
- Completed Application Form, submitted via the planning portal;
  - Covering letter, prepared by DP9;
  - Additional CIL Information Form;
  - Suite of drawings including Site Location Plan, Existing and Proposed Plans, Sections and Elevations, and Landscape Plans; prepared by Morris + Company, New Practice and Context Office;
  - Design and Access Statement, prepared by Morris + Company, including;
    - a) Landscape Statement, by New Practice and Context Office;
    - b) Crime Impact Assessment, by Morris + Company;
  - Townscape Visual Impact Assessment (including Accurate Visual Representations), prepared by Turley and AVR London;
  - Affordable Housing Statement, prepared by Regal;



- Financial Viability Assessment, prepared by BNP Paribas;
- Student Housing Management Plan, prepared by Homes for Students;
- Preliminary Ecology Appraisal, prepared by Greengage;
- Arboricultural Impact Assessment, prepared by TMA;
- Biodiversity Net Gain Assessment, prepared by Greengage;
- Detailed Health Impact Assessment, prepared by Volterra;
- Air Quality Assessment, prepared by AQC;
- Acoustic Report, prepared by RBA;
- Land Contamination Report/Geotechnical Assessments, prepared by HDR;
- Basement Impact Assessment, prepared by HDR;
- Statement of Community Involvement, prepared by Meeting Place;
- Draft Construction Management Plan, prepared by Regal London;
- Healthy Streets Transport Assessment, prepared by Icenl;
- Framework Travel Plan, prepared by Icenl;
- Delivery and Servicing Management Plan, prepared by Icenl;
- Flood Risk/SUDS Strategy/Drainage Report, prepared by HDR;
- Fire Statement and London Plan Fire Statement, prepared by Jenson Hughes;
- Energy Statement and Overheating Assessment, prepared by Wallace Whittle;
- Sustainability Statement (incl BREEAM Pre-Assessment, Whole Life Carbon and Circular Economy), prepared by Wallace Whittle;
- Daylight and Sunlight Assessment, prepared by GIA; and,
- Economic Regeneration and Employment and Skills Strategy (Including Student Housing Needs Assessment) , prepared by Volterra.

1.13 The Proposed Development has been subject to an Environmental Impact Assessment (“EIA”) Screening Opinion which was issued by Camden on 02 August 2024 (ref. 2024/3371/P) which confirmed that the development would not be EIA development under the Town and Country



Planning (Environmental Impact Assessment) Regulations 2017 (as amended) and an Environmental Statement is not required as part of the planning application.

1.14 This Statement is structured as follows:-

- **Section 2** describes the context of the Site and its surroundings;
- **Section 3** identifies the planning history of the site and relevant forthcoming planning activities in the surrounding area;
- **Section 4** details how the proposals have been formed with input of a range of stakeholders including pre-application engagement with the Local Planning Authority and other key stakeholders;
- **Section 5** describes the proposals in detail;
- **Section 6** identifies the Development Plan and wider material considerations of relevance to the proposals;
- **Section 7** assesses the acceptability of the proposals in the context of the Development Plan and material considerations;
- **Section 8** discusses potential Planning Conditions and Section 106 Obligations in connection with the proposals; and
- **Section 9** draws conclusions from the preceding sections.



## 2. Site Context

- 2.1 The Site comprises three buildings located at 33-35 Jamestown Road, London NW1 7DB and 211 Arlington Road London, NW1 7HD within the London Borough of Camden (“LBC”). The Site lies between Jamestown Road to the immediate north and Arlington Road to the east. Camden High Street is located parallel to Arlington Road to the east of the Site. The site location is shown at Figure 1:



*Figure 1 – Site Location Plan, prepared by Morris + Company*

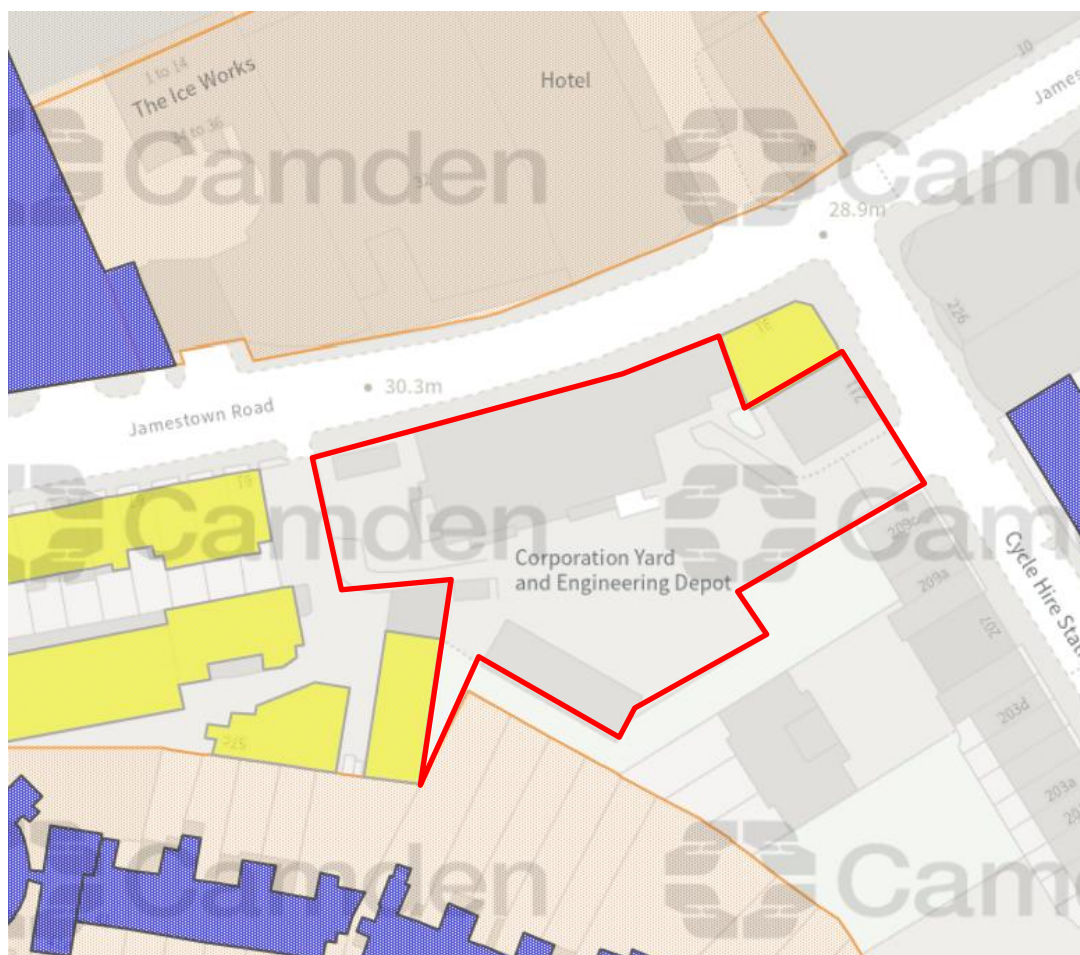
- 2.2 The existing buildings on site comprise a total of 2,173 sqm of floorspace which were last in use as offices and depot, within a Commercial, Business and Service (Class E) and Sui Generis use for the basement car park 2,737 sqm. On this basis, we consider that the only “office” elements on site total 1,436sqm over three different buildings.
- 2.3 We do not consider there are any conditions or operational limitations that would have restricted the building from automatically transitioning to an open Commercial, Business and Service (Class E) use in September 2020, in line with regulation 7 of the Town and Country (Use Class)(Amendments) Order 2020.
- 2.4 The existing land use is therefore considered to be a mix of Class E and sui generis.
- 2.5 Due to this former employment use, the Site has been allocated for employment and residential uses as part of the Council’s Local Plan Review which has just concluded Regulation 18 consultation in March 2024. The Applicant has made written representations to the Plan and has sought to review the proposed land uses and quantum of development within the



draft site allocation. Full details of the site's draft allocation are provided in Section 6 Planning Policy Framework and Overview.

### Heritage Designations

- 2.6 The Site is not located in a conservation area, however it is in close proximity to the Primrose Hill Conservation Area to the south-west and the Regents Canal Conservation Area to the north. None of the buildings on site are locally or nationally listed, though there are several statutorily and locally listed heritage assets in the site's surrounding area, including Arlington House to the east (Grade II listed), and several properties on Gloucester Crescent, to the south, namely Piano Factory Building (Grade II listed), and 36-41 Gloucester Crescent (Grade II listed).
- 2.7 In terms of locally listed buildings, the Site is surrounded to the east, west and south by locally listed, non-designated heritage assets, these being 31, 57A-D and 61-85 Jamestown Road. These are shown at figure 2, with the site boundary approximately shown in red.



*Figure 2 – Heritage map extract with site boundary shown approximately in red*

- 2.8 The Site is situated less than 100m to the south of Regents Canal, however it should be noted the Site is located in Flood Zone 1 and therefore has the lowest probability of land or sea flooding.



- 2.9 The Site is in a highly accessible location with a Public Transport Accessibility Level (“PTAL”) of 6a. The Site is approximately 500m to the north-west of Camden Town Underground Station, and an estimated 800m to the west of Camden Road Overground Station. The Site is also located in close proximity to several bus stops including Camden High Street and Kentish Town Road. The above demonstrates the Site is situated in a highly sustainable location.
- 2.10 The Site sits in an area with a range of land uses including residential properties to the immediate west and south; hotel and commercial uses to the north and restaurant uses to the east, along Jamestown Road. The buildings surrounding the Site typically span from two to six storeys. The immediately adjacent buildings, including the Cushla public house and opposite Holiday Inn Hotel, comprise materially taller buildings than the existing height of the Site and this has influenced the height and massing approach in the proposed design. This is set out in further detail in the supporting Design and Access Statement, prepared by Morris + Company submitted under separate cover.



### 3. Planning History

3.1 A desk top search of the Site's planning history indicates there has been no major planning applications on site in recent years. Figure 3 below shows the full planning history on Site.

LBC Ref.	Description of Development	Status
2024/3371/P	EIA scoping opinion ( <i>ahead of the submission of this application</i> ).	LBC confirmed application does not require EIA (September 2024)
2013/2773/P	Installation of steel modular Portacabin for a temporary period of seven years.	Granted (July 2013)
2008/4151/P	Details of roller shutter to be installed to the narrow front entrance on Jamestown Road pursuant to condition 4 attached to council's own permission under regulation 3 granted on 14th April 2008 (ref:2008/0549/P) for installation of glass canopies to front and rear entrance doors (north and south elevation), new railings to ramp at rear (south elevation), replacement of front entrance door, addition of brise soliel above windows (north, south and east elevations), redecoration of cladding to front and rear, installation of air conditioning units within an acoustic enclosure at side (west elevation) and bricking up of ground floor window opening on front (north) elevation all in connection with existing offices (Class B1).	Granted (January 2009)
2008/0549/P	Installation of glass canopies to front and rear entrance doors (north and south elevation), new railings to ramp at rear (south elevation), replacement of front entrance door, addition of brise soliel above windows (north, south and east elevations), redecoration of cladding to front and rear, installation of air conditioning units within an acoustic enclosure at side (west elevation) and bricking up of ground floor window opening on front (north) elevation all in connection with existing offices (Class B1).	Granted (April 2008)
2004/5144/P	The installation of new doors and windows, new external glazed canopies and external roof mounted air conditioning plant in association with the use of the ground floor workshop space as offices (Class B1).	Granted (January 2005)
2003/2763/P	The demolition of the existing single storey building and erection of a two-storey building comprising welfare facilities on ground floor and offices on 1st floor.	Granted (January 2004)
9500893	Erection of a single storey infill rear extension at ground floor level.	Granted (September 1995)
9300458	The change of use from offices and canteen ancillary to a depot to use for office and counselling accommodation.	Granted (October 1993)
9210062	Approval of details of the external appearance of all buildings and landscaping pursuant to Conditions 01 and 03 of the planning permission dated 24.09.92 (Reg No. 9200217)	Granted (November 1992)



LBC Ref.	Description of Development	Status
9200217	Redevelopment of the former depot site to provide 19 x 1-bedroom flats 12 x 2-bedroom flats 2x2-bedroom maisonettes 7 x 3-bedroom houses and 8 x 4-bedroom houses with 24 car parking spaces and landscaping	Granted (September 1992)
8802240	Erection of a single storey building to store road salt	Granted (September 1988)
H11/32/A/281 32	Retention of a pre-cast concrete salt store for a further limited period	Granted (May 1979)

*Figure 3 - Planning History*

- 3.2 It is understood no further planning applications have been submitted on site. The original planning application for the current buildings on the Site has not been able to be located using Camden's planning portal. Officers also confirmed during the pre-application stage that Camden have been unable to locate any record of it.



## **4. Pre-Application Discussions and Consultation**

- 4.1 Paragraphs 39-43 of the NPPF highlight the importance of early engagement with stakeholders to improve the efficiency and effectiveness of planning for all parties. The more engagement and the earlier it occurs, the better the outcomes. Good quality engagement between public and private resources enables better co-ordination and improves outcomes for the community.
- 4.2 The Applicant and Design Team have carried out extensive engagement on the Proposed Development since March 2024 with the London Borough of Camden and the Metropolitan Police Designing Out Crime Officer. The Proposed Development was scrutinised twice; on 10 May 2024 and 26 July 2024 at the Camden Design Review Panel.
- 4.3 The Proposed Development has been subject to public consultation in May and July 2024. A Development Management Forum was held by Camden on 17 July 2024. The details of the consultation and feedback are outlined in full within the submitted Statement of Community Involvement, prepared by Meeting Place.
- 4.4 The design of the Proposed Development has been iterative and subject to ongoing feedback from various stakeholders including statutory bodies and members of the local community. Details of the design changes during the pre-application stage are outlined in the Design and Access Statement, prepared by Morris + Company.

### **Local Planning Authority**

- 4.5 A comprehensive programme of meetings with Camden's planning, design, transport, sustainability, waste and air quality officers has been carried out since March 2024 to inform the over design, land use and architectural detailing of the Proposed Development through a Planning Performance Agreement.
- 4.6 The main feedback has related to the overall massing composition of the building, with officers keen to ensure that massing visibility is minimised from agreed local views from Gloucester Crescent. Officers agreed that the Site sits within three very different contexts and should respond well to all of them through careful design.
- 4.7 Officers agreed that the demolition of the buildings was justified and that retrofit was not possible to optimise the Site through the design led approach. Officers also agreed in principle that retention of an employment led use on Site was not feasible. The proposed uses within the proposed development have been supported in principle by Officers at Camden.
- 4.8 Over the course of several meetings, the overall height and massing of the buildings was reduced by three storeys, and the overall form of the different parts of the building have been amended to rationalise the composition of the massing, particularly at the rear wing of the student accommodation building.



- 4.9 The approach to the affordable housing element in massing terms is strongly supported, particularly the inclusion of front doors on Arlington Road, and deck access for the upper floors where flats are located.
- 4.10 Overall, the pre-application process with Officers has been positive, iterative and led to meaningful design changes that have resulted in a development which is supported in principle by Officers at the time of submission.

#### **Design Review Panel**

- 4.11 The Proposed Development has been subject to scrutiny by two Design Review Panels in May and July 2024. The Panel's written feedback is summarised below:-

##### First Review (10<sup>th</sup> May 2024)

- The panel supports the principle of development and much positive work has been undertaken, with a suggestion that the overall density of the site should be slightly reduced. It was welcomed that the proposals could be reviewed at such an early stage.
- The panel considers that the layout is successful with student and residential arranged around courtyards.
- The panel considered that the height along Jamestown Road and Arlington Road should be reduced, with a revision to the overall composition of the rear.
- The design should futureproof the adaptation of student accommodation to housing and make this clear as part of any planning application.
- The architecture should have greater overall coherence, and respond to its prominent neighbours;

##### Second Review (26<sup>th</sup> July 2024)

- The panel confirmed that the proposals have developed positively since the first review and have resulted in a much improved scheme, particularly the reductions in height and rationalisation of the overall massing;
- The panel suggested that further architectural changes could be made to make the architecture more joyful, overall it is moving in a positive direction.
- The balconies facing Jamestown Road should ensure that occupants benefit from privacy when using them;
- The revised elevation to Jamestown Road featuring a crank is a positive alteration, giving relief to the street and creating a more sympathetic relationship to the street.



- The courtyard amenity spaces have developed positively, particularly the removal of the sunken courtyard for the student communal space.
- There are opportunities to make the entrance sequence to the student accommodation and the residential flats more legible and simpler.

### **Community and Political Engagement**

- 4.12 A programme of consultation and engagement has been carried out, led by Meeting Place. The submitted Statement of Community Involvement outlines in full the engagement to date, including a summary of the feedback and details of the consultation material.
- 4.13 Two public exhibitions were held between 23-25 May 2024, and again on 9-13 July 2024 at the Castlehaven Community Centre. The feedback was varied with much of it centred around understanding the proposed building heights and concerns around construction impacts. There was support for the regeneration of the Site and general consensus that the existing buildings make a poor contribution to the local area. There was support for the introduction of affordable housing on Site.
- 4.14 Camden held a Development Management Forum on 17 July 2024 [online](#) with approximately 45 attendees with many of the questions related to transport, traffic flows (including Camden's plans to partially pedestrianise Camden High Street), parking and impacts on local infrastructure.
- 4.15 Since the consultation, the Proposed Development has been reduced by a storey in height from Jamestown Road and further details of construction management are set out in the submitted Draft Construction Management Plan.
- 4.16 Ward Councillors have been engaged through the consultation process. Regal have also engaged directly with other key local businesses and stakeholders throughout the pre-application process.
- 4.17 Feedback from the local community has led to design development, including a reduction in height over what was presented at the last round of consultation and the Development Management Forum.

### **EIA Screening Opinion**

- 4.18 An EIA Screening Opinion was submitted to the Council on 12<sup>th</sup> August 2024 (ref. 2024/3371/P) and subsequently the Council issued an Opinion on 2<sup>nd</sup> September 2024 which confirmed that the proposed development is not EIA development and therefore an Environmental Statement is not required within this full planning application.



## 5. Application Proposals

- 5.1 This section describes the proposals and should be read in conjunction with the full suite of documents submitted in support of the application, these are described in Section 1.

### Description of Development

- 5.2 Full planning permission is sought for:-

*“Demolition of existing buildings and structures to facilitate redevelopment comprising a Purpose Built Student Accommodation (Sui Generis) block over the basement, ground, plus six storeys and seventh-floor plant room with flexible commercial (Class E) on the ground floor and a residential (Class C3) block over the ground plus five storeys. Each block has two private courtyards with hard and soft landscaping, cycle parking, and associated works.”*

- 5.3 The Design and Access Statement, prepared by Morris + Company has been prepared in accordance with Article 9 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended). It describes the proposals in full.

### Overview of the Proposals

- 5.4 The Proposed Development seeks to transform a vacant and underdeveloped site to provide a mix of purpose built student accommodation, much needed affordable housing and flexible commercial space in a sustainable location which will optimise a prominent, derelict, brownfield site and improve its relationship to the wider area through active ground floor frontages and high quality architecture.
- 5.5 The Applicant’s vision is to realise the full potential of this vacant, underutilised and inefficient site on the edge of Camden Town and bring forward an exemplar mixed use sustainable scheme with open spaces that contributes positively to the local area.
- 5.6 The proposed areas for the proposed development are shown at Figure 3.

Land Use	Proposed (GIA)	Proposed (GEA)
Flexible Commercial (Class E)	255 sqm	318 sqm
Residential (Class C3)	2,816 sqm	3,360 sqm
Purpose Built Student Accommodation (Sui Generis)	6,449 sqm	7,224 sqm
Total	9,520 sqm	10,902 sqm

Figure 4 – Proposed Floor Areas



### **Demolition and Re-use**

- 5.7 The Proposed Development seeks the demolition of existing buildings and structures. An early feasibility study was carried out during the pre-application process which concluded that it was not possible to retain the existing building fabric whilst optimising the Site. Three options were considered in whether the buildings or parts of their structure could be re-used, which highlighted that attempting to retain part of the structure would compromise the efficiency of the structure and result in much of the existing fabric needing to be demolished to allow for new massing to be delivered above it. A variety of land uses were tested as part of this study which is outlined in the Design and Access Statement, prepared by Morris + Company.
- 5.8 Opportunities to maximise the level of retention, including on-site retention of materials in the proposed hard landscaping have been reviewed and will be developed at a later stage. Circular economy principles have been considered and will form part of the detailed design stage. This approach is in line with Regal's principles as a business which seek to take a retrofit first approach to development.

### **Scale, Layout and External Appearance**

- 5.9 The scale and massing of the Proposed Development has been designed to sit comfortably within the townscape whilst fully optimising the Site through the design led approach. The student accommodation building would comprise ground plus six storeys plus plant (56.37m AOD) with the residential building rising to ground plus five storeys. The existing basement level is proposed to be extended laterally and vertically.
- 5.10 The design intention is to keep a lower height on Arlington Road in order to provide a suitable height around the public house to "bookend" the building with an interesting gable end while, respecting the Site's surrounding urban grain. The focus of height in the proposed scheme is centrally to the Jamestown Road frontage in response to the existing townscape precedent of taller buildings facing Regents Canal to the north.
- 5.11 The layout of the buildings provide to back to back land uses centred around courtyards to efficiently locate the student accommodation and affordable housing across an awkwardly shaped site, creating two "C" shaped land uses with access to their own amenity spaces, this is illustrated at figure 5.



*Figure 5 – Overview of the layout of the Proposed Development*

- 5.12 In regard to the Proposed Development's external appearance, the proposed material palette draws on local context and character with a mix of brick, metal and pre-cast stone within the palette reinterpreting the previously discussed qualities as pragmatic and beautiful architecture, appropriate for modern methods of construction. The approach to the overall architecture is set out below at figure 6.



*Figure 6 – Proposed Façade Treatment*

- 5.13 The architectural treatment has been broken up into a strong base, a regular body with a horizontal emphasis with a differentiated crown on the student accommodation building, and the residential block. The Proposed Development includes subtle brick colours with intricate



craftsmanship which provide a canvas for other elements to be amplified, such as the rich metalwork, and provide a robust facade system. The Proposed Development's sculpted precast textures relate back to various stone elements found in Arlington House.

#### **Student Accommodation and Flexible Commercial Space**

- 5.14 The Proposed Development seeks to provide Purpose Built Student Accommodation (PBSA) in a sustainable location. The proposed student rooms are all studios and there are no cluster rooms proposed. The Proposed Development comprises 187 best in class rooms with supporting communal amenity spaces both internally and in the dedicated courtyard space.
- 5.15 In addition to the student accommodation and affordable housing, the Proposed Development also seeks to provide 318sqm of flexible commercial space (under Use Class E). The commercial space is envisaged to be provided as workspace, over ground and basement level with a lightwell to allow natural light to the basement level.

#### **Residential Accommodation, Quality and Layout**

- 5.16 The Proposed Development provides 27 affordable dwellings as a mix of 15 two bedroom units and 12 three bedroom intermediate and social rented units. The majority are provided as flats, accessed by deck from a communal entrance on Jamestown Road with three maisonettes accessed directly from Arlington Road, with flats located above. The Proposals represent 30% affordable housing by gross internal floorspace and 36% by habitable room. The measure by floorspace represents a proportionally lower percentage than by habitable room due to the common parts being almost entirely external in the form of deck access and corridors. If these areas were to count towards the total affordable provision for the purposes of providing a percentage, it would be equal to 35% by floorspace.
- 5.17 All residential accommodation would be high quality, with private external amenity spaces. The housing is centred around a private shared courtyard which provides play space for younger children. This is in line with the local policy requirements for children under 12 which are adequately catered for off-site.

#### **Access, Transport, Deliveries and Servicing**

- 5.18 Vehicular access to the site is removed as part of the car free aspiration of the Proposed Development. Improved pedestrian accesses from Jamestown Road are proposed for a communal student accommodation, flexible commercial space and affordable housing entrances, with new direct access to the new maisonettes along Arlington Road.
- 5.19 In terms of highway works, the current vehicular crossover on Arlington Road is proposed to be removed and reinstated as footway, alongside remedial works to the footway to enable integration of the new building lines and entrances on both Arlington Road and Jamestown Road. The proposals are considered to enhance the pedestrian experience along both Jamestown and Arlington Roads.



- 5.20 The proposed development is car free, though it should be noted that blue badge provision will be met if needed and secured through the Section 278 works. In regard to cycle parking, the proposed development comprises a total of 200 long stay cycle parking spaces are proposed:-
- a. 141 for student accommodation;
  - b. 54 for residential accommodation;
  - c. 5 for the flexible commercial space;
- 5.21 These spaces are provided in a mix of CaMden stands, two tier racks and larger/accessible spaces within dedicated internal cycle stores at ground and basement levels which will be secure.
- 5.22 A total of eight short stay spaces (five for the student accommodation, 2 for the residential and 1 for the flexible commercial space) are proposed in four CaMden stands to be provided on street as part of the section 278 agreement.
- 5.23 In relation to deliveries and servicing It is proposed to reconfigure part of Jamestown Road to provide an on-street loading bay which is proposed to be secured as part of the Section 278 agreement.
- 5.24 Further details of the Proposed Development's access, transport, delivery and servicing arrangements can be found within the submitted Transport Assessment and Delivery and Servicing Plan, prepared by Icen Projects.

#### **Energy, Sustainability, Landscaping and Biodiversity**

- 5.25 In relation to energy, the Proposed Development has been designed to include a range of measures to reduce the carbon emissions for the development, and a number of passive measures including improved U-Values and air permeability, low g-value, energy efficient lighting, mixed mode ventilation incorporating Mechanical Ventilation Heat Recovery and a solar PV array.
- 5.26 The Proposed Development comprises a range of sustainability measures based on the Site's overheating criteria and reduction of water consumption. Further details of the Proposed Development's sustainability measures can be found in the supporting Sustainability Statement, prepared by Wallace Whittle.
- 5.27 In regard to landscaping, the Proposed Development comprises a residential garden is a richly verdant south-facing space for relaxation, socialising and play. It balances a number of amenity uses while enhancing environmental benefits and biodiversity, providing visual amenity and privacy.



- 5.28 The proposed landscaping scheme would achieve an Urban Greening Factor (UGF) score of 0.42, and would result in a biodiversity net gain of 3,127% or 0.88 habitat units.
- 5.29 The student courtyard has a 'woodland' feel, providing small gathering spaces for students as well as those using the commercial space. The courtyard will contain new planting including new trees comprising a range of heights, textures and seasonality. This area links to a biodiverse green buffer space at the southern boundary.
- 5.30 Jamestown Road and Arlington Road are both enlivened with activity and greenery. On Arlington Road there are planted defensible spaces for each of the three maisonettes. On Jamestown Road new views-through to the planted courtyards are provided alongside residential, student and commercial entrances.



## **6. Planning Policy Framework and Overview**

- 6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise.
- 6.2 The Development Plan for the Site comprises:-
- The London Plan, published in March 2021; and
  - The Camden Local Plan, adopted in July 2017.
- 6.3 Relevant material considerations in the assessment of the proposed development include:-
- The NPPF, published in 2012 and updated most recently in December 2023; the Deputy Prime Ministers Ministerial Statement on 30 July 2024, reversing many of the changes made to the NPPF in December 2023;
  - National Planning Practice Guidance (“NPPG”) which is periodically updated;
  - Camden Planning Guidance (Supplementary Planning Guidance);
  - London Planning Guidance;
  - The draft New Camden Local Plan (Regulation 18), published in January 2024, having regard to paragraph 48 of the NPPF;
- 6.4 The Government concluded consultation on a revised NPPF in September 2024 with publication expected in early 2025. The revised NPPF is expected to place a significant emphasis on the delivery of new homes across the country.
- 6.5 An assessment of the Proposed Development against the Development Plan is provided at section 7 of this statement.
- 6.6 The Site has no adopted policy designations in accordance with the Camden Local Plan Policy Proposals Map, adopted in July 2017 (and updated in January 2021).

### **The London Plan**

- 6.7 The London Plan (published by the Greater London Authority “GLA”) is the overall spatial development strategy for Greater London, which includes the 32 Boroughs and the City of London. The Plan is centred around Good Growth, with a focus on building strong and inclusive communities, making the best use of land, creating a healthy city, growing a good economy and increasing efficiency and resilience.



6.8 The London Plan sets housing targets for Camden and recognises the importance of delivering high quality housing, particularly affordable housing. It also recognises that there is demand for purpose built student accommodation in central and sustainable locations.

6.9 Relevant London Planning Guidance (“LPG”) and Supplementary Planning Guidance (“SPG”) and its year of publication is outlined below:-

- Fire Safety LPG (raft February 2022)
- Characterisation and Growth Strategy LPG (June 2023)
- Optimising Capacity - A design-led approach LPG (June 2023)
- Planning for Equality and Diversity in London SPG (October 2007)
- Accessible London SPG (October 2014)
- Affordable Housing and Viability SPG (August 2017)
- Affordable Housing LPG (draft May 2023)
- Development Viability (draft May 2023)
- London View Management Framework SPG (March 2012)
- Social Infrastructure (May 2015)
- Housing SPD (March 2016)
- Urban greening factor LPG (February 2023)
- Air quality positive LPG (February 2023)
- Air quality neutral LPG (February 2023)
- Be Seen energy monitoring LPG (March 2022)
- Circular economy statements LPG (March 2022)
- Energy Planning Guidance (March 2022)
- The control of dust and emissions in construction SPG (July 2014)
- Whole life carbon LPG (March 2022)
- Student Housing (draft October 2023)
- Sustainable Transport, Walking and Cycling LPG (March 2023)



## **Camden Local Plan**

- 6.10 The Camden Local Plan sets out how development will be managed within the Borough. The Plan seeks to address a number of challenges, adapting to Camden's growing population and to social change, the supply and cost of housing in the Borough, maintaining a successful economy and improving opportunities, inequalities, health and wellbeing, improving transport, quality of the environment and crime and safety.
- 6.11 To address these challenges, the Plan sets three key objectives:-
- (1) Developing new solutions with partners to reduce inequality and improve health and wellbeing
  - (2) Creating conditions for and harnessing the benefits of economic growth
  - (3) Investing in our communities to ensure sustainable neighbourhoods
- 6.12 Camden's objective is to create the conditions for growth to provide the homes, jobs and other facilities needed to support it, while ensuring that growth delivers opportunities and benefits for our residents and businesses. The Plan aims to deliver sustainable growth while continuing to preserve and enhance the features that make Camden such an attractive place to live, work and visit. The Plan establishes that residential is the priority land use within the Borough.
- 6.13 The most recent Housing Delivery Test, published on 19 December 2023 for 2022, outlines that the presumption in favour of sustainable development now applies to Camden, which engages paragraph 11(d)(ii) of the NPPF (the "tilted balance") in respect of the Proposed Development.
- 6.14 Relevant Camden Planning Guidance and its year of publication is outlined below:-
- Access for All CPD (March 2019)
  - Air Quality CPG (March 2018)
  - Basements CPG (January 2021)
  - Biodiversity CPG (March 2018)
  - Design CPG (January 2021)
  - Developer Contributions (March 2019)
  - Employment Sites and Business Premises (January 2021)
  - Energy Efficiency CPG (January 2021)



- Housing CPG (January 2021)
- Public Open Space CPG (January 2021)
- Student Housing CPG (May 2019)
- Transport CPG (January 2021)
- Water and Flooding CPG (March 2019).

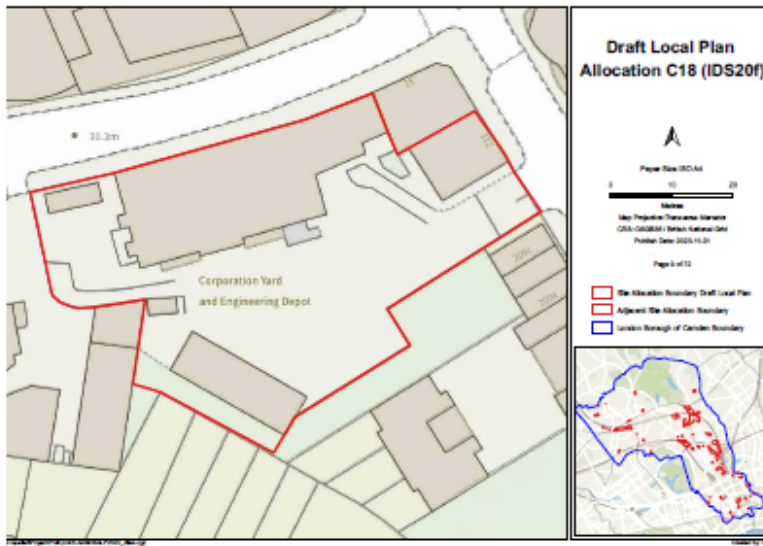
### **Emerging Planning Policy**

- 6.15 Camden are in the process of preparing a New Local Plan and the Council have published a new draft Camden Local Plan (incorporating site allocations) for consultation. The draft Camden Local Plan is a material consideration and should be taken into account in the determination of planning applications, though at this stage there is somewhat limited weight. The weight that the Draft Local Plan can be given will increase as it progresses towards adoption – currently anticipated in 2026.

### **Site Allocation**

- 6.16 The Draft Camden Local Plan identifies the Site in its draft site allocations, under allocation C18 (IDS20f) – “Arlington Road Former Depot Site”. The allocation outlines its preferred use as employment and permanent self-contained homes and the Council suggest an indicative capacity of 66 additional homes. The allocation is shown below.



ALLOCATION C18 (IDS20f) – Arlington Road former depot site	
<b>SITE PLAN</b>	
<b>ADDRESS</b>	211 Arlington Road, London, NW1 7HD and 33-35 Jamestown Road, NW1 7DB
<b>AREA</b>	0.2 ha
<b>ALLOCATED USE</b>	Employment and permanent self-contained homes
<b>INDICATIVE CAPACITY</b>	66 additional homes
<b>DESCRIPTION OF EXISTING SITE</b>	The site is located on the corner of Arlington Road and Jamestown Road. The site is located immediately adjacent to, but outside of, Camden Town town centre.
<b>BACKGROUND</b>	
The site was until recently used by Camden Council as offices as a base for its street cleaning services. The depot buildings are generally low rise and have a functional appearance, commensurate with the uses they support.	
<b>DEVELOPMENT AND DESIGN PRINCIPLES</b>	
<p>Development must:</p> <ul style="list-style-type: none"> <li>a) be designed to ensure that the operation of existing, or future, employment uses on the site are not compromised by the introduction of housing;</li> <li>b) explore opportunities to create a more active and engaging street frontage along Arlington Road and Jamestown Road;</li> <li>c) ensure it relates successfully to the existing public house on the corner of Arlington Road / Jamestown Road, which is a locally listed building, and avoid any adverse impact on its continuing operation; and</li> <li>d) be designed giving careful consideration to scale and massing due to the potential impact on designated conservation areas nearby and neighbouring occupiers.</li> </ul>	

- 6.17 It should be noted that the Applicant submitted representations on the Draft Camden Local Plan which outline that the indicative capacity of the Site should be revised to allow for greater flexibility and consideration of alternative uses on the Site and ensure that the site is optimised through the design led approach.



## 7. Planning Policy Assessment

7.1 This section sets out an assessment of the Proposed Development against the Development Plan alongside the other material considerations listed in Section 6.

7.2 The key planning considerations addressed in this section are as follows:-

- **The principle of development**, including:-
  - Demolition of the building and potential re-use;
  - Loss of the existing use;
  - Principle of housing, affordable housing and student accommodation;
  - Retention of flexible commercial use;
- **The design and massing**, including:-
  - Whether the proposed design is acceptable;
  - Residential design quality;
  - The provision of communal open space;
  - The approach to landscaping and urban greening;
  - The approach to accessibility and inclusive design;
  - The approach to cycle parking, fire safety and design for disassembly and re-use;
- **The heritage and townscape**, including:-
  - An assessment of the impacts of the Proposed Development on local views;
  - A summary of any harm and/or benefits to heritage assets;
  - The townscape impact of the Proposed Development;
- **The environment and sustainability**, including:-
  - The approach to deliveries, transport, servicing and impacts on the local transport network;
  - The proposed energy, overheating and sustainability strategy;
  - The impact on daylight, sunlight and overshadowing;



- The impact on air quality;
- The impact of noise, vibration and agents of change;
- Sustainable drainage impacts; and
- Biodiversity impacts.

7.3 This section provides a summary of the relevant policies, grouped into sections and topics, followed by an assessment of the Proposed Development in turn against the Development Plan and any relevant material considerations. This section draws on the findings and conclusions of the submitted application documents, outlined at section 1 of this Statement.

#### **Principle of Development**

- 7.4 At the heart of the NPPF is the presumption in favour of sustainable development (Paragraph 11), achieved through meeting the three ‘overarching aims’: building a strong, responsive and competitive economy; supporting strong, vibrant and healthy communities; and contributing to, protecting and enhancing the natural, built and historic environment.
- 7.5 Paragraph 123 of the NPPF supports the use of land for “objectively assessed needs, in a way that makes as much use as possible of previously-developed land”. The NPPF also encourages local authorities to seek multiple benefits from urban land through mixed use schemes, whilst taking opportunities to achieve net environmental gains (Paragraph 124a).
- 7.6 The above is supported by the London Plan which at a regional level, outlines the GLA’s ambition to also make the best use of land and enable the development of brownfield through Policy GG2. The policy states that Councils should proactively explore the potential to intensify the use of brownfield land to support additional homes, particularly those located in locations with good public transport links. Policy D3 sets out that all development must make best use of land through following the design led approach to optimise site capacity.
- 7.7 Policy G1 of the Local Plan sets out how the Council envisage growth to be delivered in the Borough. It establishes that the Council will deliver growth through high quality development, promoting the most efficient use of land and buildings by supporting development that makes best use of its site, taking into account quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility and any other considerations relevant to the site.
- 7.8 Policy C1 of the draft Local Plan sets out how the Council expect development to come forward in Central Camden. Part B states that sites have been allocated in the central area to deliver new homes over the plan period.
- 7.9 The following section will set out the key planning considerations in relation to the principle of the proposed development on site and provide a conclusion.



#### Demolition and potential re-use

- 7.10 Paragraph 152 of the NPPF states that the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.
- 7.11 Policy SI7 of the London Plan outlines the GLA's policy on reducing waste and supporting the circular economy. The policy states applications should promote circular economy outcomes and aim to be net zero-waste.
- 7.12 On the local level, Policy CC1 of the draft Local Plan outlines that the Council will prioritise the provision of measures to mitigate and adapt to climate change and require all development in Camden to respond to the climate emergency by, including but not limited to: following circular economy principles, minimising waste and increasing re-use; reducing whole life carbon emissions, by taking a whole life carbon approach, considering both embodied carbon and operational carbon; utilising low carbon technologies and maximising opportunities for renewable energy generation, and heat networks; and, being designed to be resilient to climate change and meet the highest standards of sustainable design and construction.
- 7.13 Part E of the policy requires all proposals that involve substantial demolition to demonstrate that it is not possible to retain and improve the existing building. The supporting text at paragraph 8.17 of the Plan states that all proposals for substantial demolition and reconstruction should be fully justified in terms of the optimisation of resources and energy use, in comparison with the existing building. Paragraph 8.19 of the Plan states that the Council will expect developers to consider the service life of buildings and their possible future uses to optimise resource efficiency.

#### Assessment

- 7.14 The Design and Access Statement, prepared by Morris + Company sets out an overview of the options testing that was carried out at an early stage to ascertain whether it was possible to retain the buildings whilst optimising the Site through the design led approach.
- 7.15 This analysis considered three options for the full and partial retention of the buildings, compared with redevelopment. The analysis concluded that meaningful retention of any part of the buildings would significantly compromise the ability to optimise the Site and would result in a constrained building with hindered operational energy performance, accessibility issues, issues with acoustics and fire routes, and multiple single aspect units. Opportunities for re-use of materials on Site, particularly the proposed landscaping have been considered by the design team. The principles of justifying demolition were agreed with Camden early on during the pre-application process.



- 7.16 It is considered that the Proposed Development is in accordance with the Development Plan with regard to fully exploring alternatives and justifying demolition of the existing buildings on Site.

Loss of Existing Use

- 7.17 At the regional level, Policy E1 of the London Plan seeks to retain commercial spaces including offices, retail, and other business uses and encourages the refurbishment or redevelopment of outdated office space rather than complete loss, supporting intensification to meet demand.

- 7.18 Policy E1 and E2 of the Local Plan seek to safeguard existing employment sites in the borough that meet the needs of industry and other employers. The policy protects sites that are suitable for continued business use, in particular for small businesses and businesses that provide employment for Camden residents, and those which support the functioning of the Central Activities Zone or the local economy. Policy resists the loss of business premises for non-business uses unless it is demonstrated to the Council's satisfaction:-

- The site is no longer suitable for its existing business uses; and
- That the possibility of retaining, reusing or redeveloping the site for a similar or alternative type and size of business use that has been fully explored over an appropriate period of time.

- 7.19 Paragraph 5.37 of the Local Plan in the supporting text to policy E2 states that (**emphasis added**):-

*"When assessing proposals that involve the loss of a business use to a non-business use we will consider whether there is potential for that use to continue. We will take into account various factors including:*

- *the suitability of the location for any business use;*
- *whether the premises are in a reasonable condition to allow the use to continue;*
- *the range of unit sizes it provides, particularly suitability for small businesses; and*
- *whether the business use is well related to nearby land uses*

*In addition to the considerations above, where a change of use to a non-business use is proposed, the applicant must demonstrate to the Council's satisfaction **that there is no realistic prospect of demand to use the site for an employment use**. The applicant must submit evidence of a thorough marketing exercise, sustained over at least two years. The premises should be marketed at realistic prices, include a consideration of alternative business uses and layouts and marketing strategies, including management of the space by specialist third party providers."*



- 7.20 The Employment Sites and Business Premises CPG provides some further guidance on the Council's expectations for justifying the loss of business premises. In particular, paragraph 45 of the CPG states that the Council will consider shorter marketing periods where the premises have been completely vacant for at least three continuous years up to the date of the submission of a planning application.
- 7.21 The CPG also provides detail of when and how the Council will seek a financial contribution where loss of employment floorspace is proposed, to support local training and skills initiatives in the Borough.
- 7.22 The draft Site Allocation C18 in the draft Local Plan seeks development of employment floorspace and housing. The allocation arose through an internal Council officer and the Applicant has made site specific representations which question the detail of the allocation in terms of land uses. At this stage, the allocation carries very limited, if any weight in advance of submission to the Planning Inspectorate for Examination in Public.

#### Assessment

- 7.23 In terms of whether an employment use could continue within the existing buildings; these were last used by Camden's Environmental Services team as a depot for waste vehicles and office space who have since been relocated to Regis Road in 2021. The existing buildings are poor quality and not suited to modern working practices. The Site is not within a town centre, the Central Activities Zone or a Growth Area where significant business/office growth is targeted. In addition to the above, the site has been vacant since early 2022 when the Site was sold to the Applicant.
- 7.24 It is considered that the proposed mix of land uses on site and the irregular form and relationship to surrounding residential uses would make it challenging to retain employment uses on site whilst maintaining active frontages, multiple entrances and waste and cycle storage.
- 7.25 The Site was acquired by the owners in 2022 when the Council disposed of the asset. It was marketed by the Council for a period of 6 months before it was acquired by the current owner. Since then, it has not been actively marketed for employment use.
- 7.26 It has been vacant for a period of over 18 months and was never formally part of the active office market given its continued use for Council services as a Council's own asset and has not ever been marketed for commercial purposes on the open market.
- 7.27 The previous uses that are present on Site were bespoke for a specific Council function and use as a waste vehicle depot. The loss of this use was permitted in the 1990s for a residential development although this was never implemented. It is not considered that the loss of these business functions will impact any previous operators or prejudice the pipeline of commercial growth within Camden.



- 7.28 Only one of the existing buildings has an Energy Performance Certificate (“EPC”) with a rating of E, which expires in 2027. The building at 211 Arlington Road does not have an EPC rating. From 2030, new Minimum Energy Efficiency Standards are expected to require all commercial lettings to have a rating of EPC B or higher. The current standard is an “E” rating or better, with stricter targets expected to be introduced in the interim. Whilst building C could be re-let on the basis of its current EPC, it is likely that this would only be for a very short period of time before significant investment and upgrading to make it lettable by 2030.
- 7.29 These works would come at a significant cost and result and not generate a commensurate investment return and be wholly unviable.
- 7.30 The building is not in a lettable condition at present. It has not been in use since the Council vacated the site and has since been stripped out. It is considered that the office use is unmarketable in its present condition and would need a significant investment in order to market it and let it in continued commercial use. This has been acknowledged by the Council in writing following pre-application discussions about the potential to retain the existing buildings.
- 7.31 In terms of potential for new or re-provided employment floorspace as part of a wider redevelopment of the Site, this has been discounted early-on because initial headline values indicate that commercial office rents for new build employment floorspace in this location would not generate viable development, and certainly not cross-fund the delivery of affordable housing.
- 7.32 The submitted Economic Regeneration and Employment and Skills Strategy, prepared by Volterra provides analysis of whether a new employment use would be suitable on the Site. It sets out the reasons why employment floorspace in this location is challenging, particularly highlighting the flight to quality, occupier needs in terms of physical space, quality and sustainability.
- 7.33 The Site is located within the “northern fringe” office location in terms of the wider London market. Camden’s own Economic Needs Assessment, prepared by Aecom in support of the Local Plan review, does not identify the Site within an economic activity cluster, the nearest being Camden Town Centre. The Assessment acknowledges the “flight to quality” and the need for office buildings to attract people into the office in well-connected locations that provide some form of benefit over the flexibility achievable by working from home. It also recognises the challenges associated with Minimum Energy Efficiency Standards and Camden’s Office stock.
- 7.34 Volterra have provided a summary of why delivering offices in this location would be challenging:-
- **Flight to quality** - to attract the best staff, businesses demand high-quality workspaces. Low quality offices without amenities in central London continue to struggle for demand. The existing building is in poor form and was used by the council



as a base depot for its street cleaning services, lacking any of the amenities and facilities that are demanded by modern working spaces. LBC recognise the presence of secondary office stock in the NW1 area, of which some would not be able to be plausibly upgraded through retrofit options, including the Jamestown Road site (dependent/to be tweaked based on the information requirements).

- **Sustainability** - businesses are seeking office space that enables them to meet environmental targets. LBC recognise in terms of office space, a greater emphasis is placed on the quality and building performance of potential space. The existing site has an EPC rating of E, which although is acceptable under current legislation by 2027 the minimum EPC rating is likely to raise to C, which would make the existing building unacceptable to be let by commercial standards without improvements to its energy efficiency. Similarly, ESG compliance is increasingly a large contributing factor to the decision-making of occupiers. Depending on the details to follow around the site, refurbishment of the site may not be able to bring the building up to the sustainability standards now sought.

- 7.35 In a hypothetical new build office scenario, bearing in mind Camden's mixed use policy which would encourage a proportion of self contained homes as part of new non-residential floorspace (with the relevant mix of affordable and market homes), and the pressing need to deliver housing, particularly affordable housing, initial analysis assumed that the Site could delivery approximately 6,450 sqm of office floorspace, arranged in a similar layout to the proposed student accommodation, delivering an average floorplate of 900 sqm at lower levels, and 460sqm at upper levels. This would result in shallow floorplate depths (ranging from 8m-15m) and incongruous, winged arrangement of the building which responds to the irregular shape of the Site. It is considered that this would create highly inefficient floorplates for commercial use.
- 7.36 It is clear that a new build office would not be viable in this location and not present an attractive offer to tenants at market rates which would enable the delivery of Camden's priority land use; housing. Importantly, it would not generate enough value to fund the delivery of affordable housing on site. Initial agent commentary has concluded that this location is not desirable for prospective tenants looking for new office accommodation and have recorded weak demand and long vacancy periods despite active marketing. The analysis concludes that speculative office development of this scale would likely remain vacant for a long period, and crucially it would fail to generate the forward funding to cross-subsidise the delivery of affordable housing on-site.
- 7.37 Given the nature of the existing site and its previous use outside of the wider commercial office market, we consider that it would be unreasonable to require marketing evidence to justify the loss of the office floorspace as the site has never meaningfully contributed to the local economy in the way that policy seeks it to. It has always been operated outside of the wider commercial market by the Council.



- 7.38 The existing buildings have clearly come to the end of its meaningful life it would be counter intuitive to market the building if it's going to require so much refurbishment which has no investment value. We further consider that marketing and reoccupying the existing building/s would hamper the ability to deliver the aspirations of the site allocation, particularly residential and a wider comprehensive development.
- 7.39 An element of flexible commercial (Class E) floorspace is provided at ground and basement level, totally 255 sqm GIA which is considered to be of an appropriate size for this location and it is envisaged by the Applicant that this would have some related function to the students using the accommodation – potentially in partnership with a University.
- 7.40 It is recognised that there is a reduction in employment floorspace on-site, which would trigger a financial contribution of approximately £110,000 towards employment and skills measures, secured by Section 106 obligation.
- 7.41 It is considered that the reduction in employment floorspace on Site is justified in accordance with policy E2 of the Local Plan, and the Development Plan more widely. The Site will retain an element of employment floorspace and the Proposed Student accommodation will also provide opportunities employment.

#### Principle of Housing and Affordable Housing

- 7.42 The delivery of new homes is a core planning principle contained within the NPPF, paragraph 60 identifies measures to “...boost significantly the supply of housing...”. Paragraph 11 of the NPPF states that Local Plans should meet the objectively assessed need for housing within its area. It further states that housing applications should be considered in the context of the presumption in favour of sustainable development.
- 7.43 Importantly, paragraph 11(d) states that for decision making, where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, permission should be granted unless (i) the application of policies in the NPPF that protect areas or assets of particular importance provides a clear reason for refusal, or (ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole. It should be noted that by the latest Housing Delivery Test for 2022, Camden are in the “presumption in favour of sustainable development”, based on their latest housing test delivery score.
- 7.44 Paragraph 60 of the NPPF outlines that in order to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed. The NPPF also promotes the efficient use of land with high density development in accessible locations.
- 7.45 Policy H1 of the London Plan seeks the provision of 52,287 additional homes per year across London. It also identifies a housing provision target of 10,380 additional homes to be



completed across a 10-year period in Camden. In support of these identified housing targets, policies GG2 and GG4 of the London Plan encourages the pro-active exploration of the potential to intensify the use of land to support additional homes, prioritising the redevelopment of brownfield land to create mixed and inclusive communities.

- 7.46 Policy H4 of the London Plan sets out that the strategic target across London is for 50% of all new homes delivered across London to be genuinely affordable. Policy H5 of the London Plan then sets out the threshold approach for major development proposals which is 35%, and 50% for public sector land or on strategic industrial locations. These thresholds determine whether an application can follow the “fast track route”.
- 7.47 The Site is public land for the purposes of this policy and therefore subject to the viability tested route in line with part F of the policy, which also requires early and late stage reviews. Policy therefore requires the Proposed Development to provide the maximum viable amount of affordable housing in accordance with a Financial Viability Assessment.
- 7.48 Policy H1 of the Local Plan confirms in that the Council will aim to secure a sufficient supply of homes to meet the needs of existing and future households by maximising the supply of housing and exceeding a target of 16,800 additional homes from 2016/17 - 2030/31, including 11,130 additional self-contained homes. It further confirms that housing is the priority land use for the Borough.
- 7.49 On a local level, Policy H4 of the Local Plan, and the Council’s Housing CPG (Camden Planning Guidance), set out the Council’s requirements for affordable housing, with the target for a proposal of this scale being 50% based on the Site’s capacity to provide more than 25 dwellings (being an uplift of over 2,500 sqm of residential and student accommodation floorspace). The policy also expects developments with a capacity of more than 10 units to provide affordable housing on-site.
- 7.50 Policy H4(a) of the Local Plan confirms the guideline mix of affordable housing tenures is 60% social-affordable rent and 40% intermediate housing.
- 7.51 In terms of emerging policy, the draft Local Plan proposes a mixed use housing and employment allocation (C18/IDS20f) for the site. It indicates that the site has capacity for 66 additional homes alongside employment uses.

#### Assessment

- 7.52 The Proposed Development would see the delivery of 27 affordable homes on-site comprising 15 two bedroom units and 12 three bedroom units. This represents 30% by floorspace and 36% by habitable room. The proposed tenure split is 10 intermediate and 17 social rent, equating to a 37% intermediate/63% social split.
- 7.53 The proposed affordable housing will make an important contribution to affordable housing stock within the Borough. The Proposed Development would make a contribution to the



trajectory of housing delivery of 102 units through on-site affordable housing and purpose built student accommodation (converted using the London Plan ratio of 2.5:1).

- 7.54 The submitted Financial Viability Assessment, prepared by BNP Paribas, concludes that the provision of 27 affordable homes provided would deliver be the maximum viable amount of affordable housing the Proposed Development can reasonably deliver resulting in an overall deficit.
- 7.55 The Applicant can confirm that initial appraisal by Camden's independent Viability Advisor, BPS has been begun at the time of submission and discussions to agree the methodology and conclusions of the submitted Financial Viability Assessment are underway.

#### Principle of Student Accommodation

- 7.56 The NPPF outlines in Paragraph 63 that within the context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. The paragraph goes on to confirm that these groups should include (but are not limited to) students.
- 7.57 This is supported by Policy H15 of London Plan which states Boroughs should seek to ensure that local and strategic need for purpose-built student accommodation is addressed, provided that: the development contributes to a mixed and inclusive neighbourhood; the use of accommodation is secured for students; the majority of the bedrooms in the development are secured through a nomination agreement for occupation by one or more high education provide; the maximum level of accommodation is secured as affordable student accommodation in line with the fast track approach; and, the accommodation provides adequate functional living space and layout.
- 7.58 Further detailed design guidance is contained within the draft Purpose Built Student Accommodation LPG which concluded consultation in January 2024. Paragraph 2.54 of the draft guidance states that conventional housing in lieu of affordable student accommodation may also be acceptable.
- 7.59 Policy H9 of the Local Plan seeks to maintain a supply of student accommodation, targeting 160 additional places in student housing per annum. The policy states that additional student accommodation will be supported provided that it does not:-
- involve the net loss of 2 or more homes,
  - prejudice the ability to meet the Council's ability to meet the target of 742 self-contained homes per year
  - involve a site identified for self-contained housing through a current planning permission or a development plan document;
- 7.60 The policy goes on to state requirements relating to affordability of student accommodation, relationship to higher education institutions and size ranges/requirements. Importantly, the policy is clear that where student housing is not robustly secured as student housing that



provides affordable accommodation to the student body (by way of an undertaking or nominations agreement), the Council will expect the development to provide an appropriate amount of affordable housing for general needs, in line with policy H4 of the Local Plan.

#### Assessment

- 7.61 In line with the above guidance, it is clear that there is a significant need for housing within Camden, including purpose built student accommodation which has an important function in releasing pressure on houses in multiple occupation and traditional housing stock within the Borough. The site is located in an area of excellent public transport accessibility and active travel routes to some of London's largest universities.
- 7.62 As outlined in the submitted Economic Regeneration and Employment and Skills Strategy, prepared by Volterra, student accommodation can have a significant and positive impact on freeing up traditional housing within the Borough and will contribute to housing delivery in terms of targets.
- 7.63 The Proposed Development's student accommodation provision is therefore considered to be acceptable including in relation to the provision of affordable housing in lieu of providing affordable student. It would have an important commercial role in subsidising the affordable housing on site and not result in an overconcentration of similar uses in the area, nor will it prejudice a Site for the delivery of conventional housing or an allocated site for other uses. The student accommodation will be secured through a nominations agreement for use by Higher Education Institutions through a section 106 obligation. It is considered that the Proposed Development is in accordance with the Development Plan with regard to student accommodation.

#### Housing Mix

- 7.64 Policy H7 of the Local Plan seeks a mix of large and small homes in each development (where large homes are defined as those with 3 bedrooms or more) and expects developments to contribute to the priorities set out at figure 7.

Unit Type	1 bed	2 bed	3 bed	4 bed (or more)
<b>Social-affordable rented</b>	Lower	High	High	Medium
<b>Intermediate affordable</b>	High	Medium	Lower	Lower
<b>Market</b>	Lower	High	High	Lower

*Figure 7 - Local Plan Dwelling Size Priorities (Local Plan Table 1)*



7.65 The Proposed Development provides the following mix of units shown at figure 8.

Unit Type	Intermediate Rented Units	Social Rented Units	Intermediate Rented Habitable Rooms	Social Rent Habitable Rooms	PBSA Units
2 bedroom	6	9	18	27	-
3 bedroom	4	8	20	40	-
Market	-	-	-	-	187
TOTAL	10	17	38	67	187
SUB TOTAL	27		105		187
TOTAL Habitable Rooms			292		

*Figure 8 - Proposed housing mix*

7.66 The detailed mix by tenure is as follows:-

- Social rent:
  - 7 x 2B3P units
  - 2 x 2B4P units
  - 2 x 3B4P units
  - 6 x 3B5P units
- Intermediate rent:
  - 5 x 2B3P units
  - 1 x 2B4P units
  - 2 x 3B4P units
  - 2 x 3B5P units

7.67 There are three wheelchair units proposed, two for the social rent and one for the intermediate, equating to 11% provision overall.

7.68 Overall, the Proposed Development provides a balanced mix of homes, responding to Camden's priority dwelling targets for two and three bedroom intermediate and social rented housing, suitable to the location and making a contribution to the identified needs in the Development Plan, in accordance with Policy H7 of the Local Plan.



### Principle of Development Conclusions

- 7.69 In conclusion, the principle of the Proposed Development on site aligns with the core principles outlined in the NPPF, the London Plan, and the Local Plan. The Proposed Development supports the principles of sustainable development by making efficient use of brownfield land, optimising sites through the design led approach, addressing London and Camden's student housing shortages, and contributing to the delivery of much needed affordable housing supply.
- 7.70 Importantly, the provision of the maximum viable amount of affordable housing and student accommodation meets identified need without compromising Camden's requirement for commercial growth. The Proposed Development would lead to the delivery of 102 housing units (when dividing the proposed student accommodation by 2.5 in line with the Government Housing Delivery Test metric), making a significant contribution to Camden's housing targets. In line with paragraph 11(d) of the NPPF, the development is in accordance with the presumption in favour of sustainable development.
- 7.71 Retention of flexible commercial space will also meet policy objectives to resist the loss of employment and business uses which are appropriate for this location.
- 7.72 It is also considered that the Site is in overall conformity with the draft site allocation C18 (IDS20f) and policy C1(B) of the draft Local Plan. Overall, the Proposed Development is consistent with the relevant planning policies and contributes positively to London and Camden's long-term goals for housing, employment, and energy and sustainability.

### **Design and Massing**

- 7.73 Current national, regional and local planning policy promotes high quality and inclusive design in new development. The NPPF makes it clear that the Government attaches great importance to the design of the built environment. Changes to the NPPF and the publishing of the final version of the National Model Design Code in July 2021 reflect the Government's commitment to making well-designed places. Chapter 12 of the NPPF describes how to achieve well designed places, and how policy making and decisions should strive to achieve this.
- 7.74 Paragraph 135 sets out that decisions should ensure developments function well; are visually attractive; are sympathetic to local character; establish or maintain a strong sense of place; optimise the potential of the site and, create places that are safe, inclusive and accessible.
- 7.75 As outlined above, Policy D3 of the London Plan states all development must make the best use of land by following a design-led approach that optimises the capacity of the site. The design-led concept requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth.
- 7.76 Policy D4.F of the London Plan furthers this and outlines that proposed developments must maintain high design quality, ensuring maximum detail appropriate is provided to avoid the



need for later design amendments. The policy also outlines the importance of design quality to be maintained throughout the development process.

- 7.77 At the local level, Policy D1, D2 and CC1 of the Local Plan seeks to secure high quality design in development. The policy requires developments to respect local context and character and preserve or enhance the historic environment and heritage assets.
- 7.78 In line with the above policies, the Proposed Development would provide exemplar design to best optimise the Site for a mix of uses with an appropriate height and massing that stitches into the surrounding, highly varied context. The architectural response is highly contextual, exemplary in quality and it is considered to be in accordance with the Development Plan.

#### Residential Design Quality

- 7.79 Policy D6 of the London Plan states that residential dwellings must be appropriately sized in order to maximise residential amenity and enhance the quality of life of occupiers.
- 7.80 Policy H6 of the Local Plan outlines the Council's policy on housing choice and mix, and confirms the Council aim to minimise social polarisation and create mixed, inclusive, and sustainable communities, by seeking high quality accessible homes and a variety of housing suitable for Camden's existing and future households.
- 7.81 In addition to the above, Supporting Paragraph 7.23 of the draft Local Plan outlines that the nationally described minimum space standards, as adopted in the London Plan, must be used as a benchmark for the size of homes in the Borough.
- 7.82 The Proposed Development provides exemplar standards of housing design, with all homes meeting and exceeding design requirements and standards for dwelling sizes, external amenity and internal storage spaces. All homes are dual or triple aspect and are in accordance with the Development Plan.

#### Communal Open Space

- 7.83 At the regional level, Policy D8 of the London states development proposals should encourage and explore opportunities to create new public realm where appropriate, and but not limited to, ensure the public realm is well-designed, safe, accessible, inclusive, attractive, well-connected, related to the local and historic context, and easy to understand, service and maintain.
- 7.84 Policy D1 of the Local Plan outlines that proposed developments should integrate well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage; and, respond to natural features and preserve gardens and other open spaces.



- 7.85 Policy A2(m) of the Local Plan requires that development provide public open space by applying a standard of 9 sqm per occupant for residential schemes and 0.74 sqm for commercial and higher education developments while taking into account any funding for open spaces through the Community Infrastructure Levy. Part n of the policy states that the Council will give priority to securing new public open space on-site, with provision off-site near to the development only considered acceptable where provision on-site is not achievable. If there is no realistic means of direct provision, the Council may accept a financial contribution in lieu of provision. Part p of the policy seeks give priority to play facilities and the provision of amenity space which meet residents' needs where a development creates a need for different types of open space.
- 7.86 The Proposed Development includes provision for on-site play space totalling 70 sqm for younger children at a rate of 10sqm per child in accordance with the GLA Child Yield Calculator. The target play space required is 62sqm. This is located in a communal courtyard for the housing block and play provision for older children will be met off-site in line with policy as there is provision within 800m of the Site.
- 7.87 No public open space is provided on Site as part of the Proposed Development in order to give priority to high quality private amenity areas. In accordance with policy, it is considered that the most appropriate provision is to make a contribution, calculated at £367,923.87 in accordance with the Public Open Space CPG via section 106 obligation for the provision of off-site public open space provision or enhancement.
- 7.88 It is considered that the Proposed Development is in accordance with the Development Plan in this regard.

#### Landscaping and Urban Greening

- 7.89 Policy G5 of the London Plan sets out that major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.
- 7.90 Policy G5 outlines that Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required for new developments. However, in the interim, the Mayor recommends a target score of 0.4 for developments that are predominately residential, and a target of 0.3 for predominately commercial developments.
- 7.91 Policy D1 of the Local Plan states the Council seek high quality development and require that proposals incorporate high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping.
- 7.92 The proposals comprise high quality landscaping including two private courtyards with a generous mix of hard and soft landscaping and an Urban Greening Factor score of 0.42, in



excess of the target for predominantly residential developments. In terms of trees, the submitted Arboricultural Impact Assessment concludes that the works of removal of a category C shrub on Site are not significant in arboriculture terms.

- 7.93 The surrounding trees have been considered and recommendations for their protection during demolition and construction can be appropriately controlled by planning conditions. It is considered that the Proposed Development is in accordance with the Development Plan.

#### Accessibility and Inclusive Design

- 7.94 Policy D7 of the London Plan requires 90% of dwellings to be designed to Building Regulations requirement M4(2) 'accessible and adaptable dwellings' with the remaining 10% to be designed to Building Regulations requirement M4(3) 'wheelchair user dwellings'.
- 7.95 This is supported by Policy H6 of the Local Plan which outlines the Council's requirement for accessible and adaptable homes, in accordance with Building Regulations. The Housing CPG provides further detailed guidance, including the need to provide social rented housing at day one as full accessible M4(3)(2)(b) housing.
- 7.96 In line with the above policies, 10% of the student rooms and housing are provided as accessible. Three two bedroom homes are provided as wheelchair accessible and located on levels 2-4 of the Proposed Development. A total of 19 student rooms are provided as wheelchair accessible.
- 7.97 Provision for one blue badge space if required is expected to be secured for the residential accommodation as part of the section 278 agreement. Further detail in relation to inclusive design is set out within the Design and Access Statement, prepared by Morris + Company.
- 7.98 It is considered that the Proposed Development is in accordance with the Development Plan with regards to inclusive access and accessibility.

#### Fire Safety

- 7.99 Policy D12 of the London Plan outlines that in the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety.
- 7.100 A Fire Statement and London Plan Fire Statement have been prepared by Jensen Hughes that outline the design measures employed in relation to fire safety. The Proposed Student accommodation is a "relevant building" for the purposes of the Building Safety Act 2022, and will be subject to the Gateway processes via the Health and Safety Executive. The proposed housing is not a "relevant building" due to its height, albeit fire safety design matters have been incorporated into the Proposed Development as a result of ongoing development between Jensen Hughes and Morris + Company.



- 7.101 Jensen Hughes conclude that the Proposed Development is in accordance with the Development Plan and legislation relating to fire safety.

### **Heritage and Townscape**

- 7.102 Camden as Local Planning Authority have statutory duties to carry out in accordance with Section 66 and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended).
- 7.103 Section 66 of the Act imposes a general duty as respects listed buildings in exercise of planning functions. Sub-section (1) states that in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have “special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses”.
- 7.104 Section 72(1) states that in planning applications relating to any building or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area. The Site is not within a conservation area, so this statutory duty is not engaged.
- 7.105 Chapter 16 of the NPPF sets out how national policy is to be applied to conserving and enhancing the historic environment. Paragraph 189 states that heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.
- 7.106 Paragraph 194 of the NPPF states that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the asset’s importance and no more than sufficient to understand the potential impact of the proposal on their significance.
- 7.107 Paragraph 199 of the NPPF states that 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.
- 7.108 Paragraph 202 of the NPPF states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset (Listed Buildings and Conservation Areas), this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.



- 7.109 Paragraph 203 of the NPPF states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.
- 7.110 Policy D3(D)(11) of the London Plan states that development proposals should respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character. Policy D9(C)(1) provides a framework for assessing the visual impacts of tall buildings.
- 7.111 Policy HC1 of the London Plan states that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate. It further states that development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.
- 7.112 Policy D2 of the Local Plan outlines the Council will preserve and, where appropriate, enhance Camden's heritage assets and their settings. The policy outlines that the effect of a proposal on the significance of a non-designated heritage asset will be weighed against the public benefits of the proposal, balancing the scale of any harm or loss and the significance of the heritage asset.
- 7.113 In support of this application, a Heritage, Townscape and Visual Statement, prepared by Turley (with Accurate Visual Representations by AVR London) has been submitted. It includes a total of eight Accurate Visual Representations, agreed with Officers during the pre-application stage.
- 7.114 The assessment concludes in townscape terms that there is a slight adverse impact in views from Gloucester Crescent looking north towards the Proposed Development causing a small degree of visibility, largely glimpsed and distant, of new built form in these views would contrasts with the finer-grain, historic form of listed buildings in the conservation area which provides their setting. This contrast is considered by Turley to be a minor distracting element in the otherwise kinetic/dynamic views along the crescent where the character and appearance of this part of the conservation area is strongly legible.
- 7.115 All other townscape views are considered to be neutral or beneficial. The Proposed Development will replace the existing poor-quality buildings on the Site with a new contemporary, high-quality development of well-considered height, mass and form and



materiality appropriate to its context and Turley consider that this sits well in the surrounding townscape context and character.

- 7.116 Paragraph 202 of the NPPF states that any less than substantial harm to designated heritage assets, should be outweighed by public benefits. Turley conclude that some, limited less than substantial harm arises from the Proposed Development engaging paragraph 202 of the NPPF.
- 7.117 The public benefits arising from the Proposed Development, which are substantial and are set out below in terms of the economic, environmental and social benefits flowing from the proposal.

#### *Economic Benefits*

- Employment and skills contribution of approximately £110,000 to support employment and skills initiatives;
- Retention of flexible commercial workspace to support the local economy;
- Provision of approximately 10 FTE jobs associated with the student accommodation use;
- Student expenditure impacts to local businesses equal to between £1.5m and £1.7m in annual spend, of which £681,000 - £766,000 expected withing Camden;
- A significant package of Community Infrastructure Levy and Section 106 financial contributions for local area enhancements;

#### *Environmental Benefits*

- Development of a brownfield site through the design led approach to optimise site capacity to create exemplar new buildings;
- A BREEAM “Excellent” pre-assessed development for the student accommodation block;
- A substantial reduction in carbon omissions of 57.7% over the baseline, including renewable energy;
- Significant landscaping will deliver over a 3,000% on-site biodiversity net gain providing ecology and biodiversity benefits to the wider area;
- High quality student accommodation and genuinely affordable homes with private amenity space and communal landscaping;
- Regularisation of delivery and servicing arrangements, including the removal of all existing car parking on site to encourage a shift towards more sustainable travel measures;



### *Social Benefits*

- Delivery of 27 affordable homes, meeting the most acute housing need for Camden and London more widely;
- Provision of 17 construction apprenticeship places and accompanying support fee, local training and procurement initiatives ;
- Localised expenditure in shops, food and beverage establishments;
- Local training and skills opportunities during construction;

7.118 It is considered that the public benefits far outweigh the very low level of less than substantial harm identified in the Heritage and Townscape Visual Impact Assessment.

7.119 On this basis, it is considered that the Proposed Development is in line with relevant statute and policies within the Development Plan.

### **Environment and Sustainability**

7.120 This Section provides an assessment of the Proposed Development in relation to environmental matters and sustainability.

#### Energy, Overheating and Sustainability

7.121 Chapter 14 of the NPPF focusses on the need for new development to be sustainable and low carbon. Amongst other requirements, development is encouraged to reduce greenhouse gas emissions, such as through its location, orientation and design.

7.122 Policy SI2 of the London Plan expects major development proposals to be net zero-carbon. In practice, this means following the 'be lean, be clean, be green, be seen' energy hierarchy to deliver a minimum on-site energy consumption reduction of 35% when compared to Building Regulations Part L 2021, with the remaining reduction up to 100% (zero carbon) achieved through maximising on-site opportunities and, where necessary, carbon offset fund payments. Part C of the policy requires that residential development should achieve 10% of this reduction through energy efficient measures.

7.123 Policy SI 4 of the London Plan outlines that major development proposals should demonstrate how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the London Plan cooling hierarchy. This hierarchy includes the following measures: reducing the amount of heat entering a building through orientation, shading, materials, fenestration, insulation and the provision of green infrastructure; minimising internal heat generation through energy efficient design; managing the heat within the building; providing passive ventilation, mechanical ventilation and, providing active cooling systems.



- 7.124 Policy CC1 of the Local Plan promotes zero carbon development and requires all development to reduce carbon dioxide emissions through following the steps in the energy hierarchy. The policy supports and encourages sensitive energy efficiency improvements to existing buildings and requires all major developments to assess the feasibility of connecting to an existing decentralised energy network, or where this is not possible establishing a new network.
- 7.125 Policy CC2 of the Local Plan requires development to be resilient to climate change, by adopting appropriate climate change adaptation measures such as the protection of green spaces and promoting new green infrastructure; not increasing, and wherever possible reducing, surface water run-off through increasing permeable surfaces and use of Sustainable Drainage Systems; incorporating biodiverse roofs, combination green and blue roofs and green walls where appropriate; and measures to reduce the impact of urban and dwelling overheating, including application of the cooling hierarchy. Part d of the policy outlines that proposals should adopt measures to reduce the impact of urban and dwelling overheating including application of the cooling hierarchy.
- 7.126 In line with the above guidance, an Energy Statement (including Overheating) and Sustainability Statement, prepared by Wallace Whittle, has been submitted in support of this application.
- 7.127 In terms of energy, the Proposed Development has been designed to achieve a 57.7% reduction in carbon emissions with a carbon offsetting contribution of £61,612 to achieve net zero carbon in line with policy. These savings are achieved through passive design measures, a high performing façade and an all-electric building with energy efficient Air and Water Source Heat Pumps and photovoltaic panels totally 182sqm with an expected energy generation of 38.53kWp. At this stage, it is not feasible to connect to a district heating network through consultation with the Local Planning Authority, however, a connection chamber is proposed for a future heating network should one come forward.
- 7.128 In terms of sustainability, the Proposed Development is pre-assessed to achieve BREEAM “Excellent” under the 2018 New Construction for purpose built student accommodation methodology.
- 7.129 Overheating analysis has been carried out which has concluded that a mixed mode ventilation system is required, with Mechanical Ventilation Heat Recovery cooling loop being proposed to manage the risk of overheating. This includes not being able to rely on openable windows to Jamestown Road due for acoustic reasons.
- 7.130 Overall it is considered that the Proposed Development will be highly sustainable and energy efficient, and be in accordance with the Development Plan.
- 7.131 In addition to the above, the Sustainability Statement sets out how the development will take a holistic approach to sustainable design and construction, through a sustainable materials procurement policy, and efficient on-site waste strategy, which will ensure that materials are re-used or recycled where possible.



- 7.132 It has therefore been demonstrated that the Proposed Development complies with specific local and regional energy and sustainability policies, as demonstrated by the substantial reduction in CO2 emissions, incorporation of renewable technology, and commitment to sustainable construction methods.

#### Deliveries and Servicing

- 7.133 Policy T7 of the London Plan sets out that development proposals should facilitate safe, clean, and efficient deliveries and servicing. The policy states provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible. Policy T7 further outlines that Construction Logistics Plans and Delivery and Servicing Plans will be required and should be developed in accordance with Transport for London guidance and in a way which reflects the scale and complexities of developments.
- 7.134 At the local level, Policy T4 of the Local Plan states that major developments likely to generate significant movement of goods or materials by road (both during construction and operation) will be expected to minimise the impact of freight movement via road by prioritising use of the Transport for London Road Network or other major roads; accommodate goods vehicles on site; and provide Construction Management Plans, Delivery and Servicing Management Plans and Transport Assessments where appropriate.
- 7.135 In line with the above guidance, a Construction Management Plan, prepared by Regal London and a Delivery and Servicing Plan, prepared by Icen Projects have been submitted in support of this application. The documents set out how the Proposed Development can be constructed, with further detail expected to be secured by planning obligations attached to the section 106 agreement in relation to demolition and construction management.
- 7.136 In terms of servicing, it is proposed to make alterations to Jamestown Road to install a section of double yellow lines by way of a section 278 agreement to enable deliveries to take place on street. The removal of the existing crossover on Arlington Road is proposed to be removed and reinstated as footway, with a double yellow line installed in its place to enable deliveries and servicing of the maisonettes to take place.
- 7.137 In terms of overall trip generation, there is an increase in seven trips when compared to the baseline which is not considered to be significant as no more than two deliveries at the same time are expected throughout the course of the day. Regularising an existing informal arrangement while intensifying the density of uses on the Site is considered to be a significant benefit of the Proposed Development.
- 7.138 It is considered that the Proposed Development is in line with the Development Plan in relation to construction management, deliveries and servicing.



## Transport

- 7.139 Chapter 9 of the NPPF is dedicated to promoting sustainable transport. Within the chapter, Paragraph 116 provides the following requirements are established from development; give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use; address the needs of people with disabilities and reduced mobility in relation to all modes of transport; and allow for the efficient delivery of goods, and access by service and emergency vehicles.
- 7.140 At the regional level, Policy T5 of the London Plan deals with cycling and sets out the minimum cycle parking standards for different types of development.
- 7.141 Policy T6.1 of the London Plan sets out that residential parking should not exceed the minimum parking standards at table 10.3. For this location, table 10.3 expects car free development. Part G of the policy sets out that disabled parking should be provided for development larger than 10 dwellings with parking provision for 3% of the dwellings provided as blue badge spaces. For the Proposed Development, this is equal to 0.81 spaces.
- 7.142 Policy A1 (h) and (i) of the Local Plan requires the Council to consider the transport impacts of development (including the use of Transport Assessments, Travel Plans and Delivery and Servicing Management Plans); and the impacts of the construction phase (including the use of Construction Management Plans). This application is accompanied by a Healthy Streets, Transport Assessment, Framework Travel Plan and Delivery and Servicing Management Plan, all prepared by Iceni Projects in accordance with the requirements of Policy A1.
- 7.143 In addition, Policy T1 of the Local Plan seeks to promote sustainable transport by prioritising walking, cycling and public transport in the Borough. Policy T2 of the Local Plan notes that the Council will limit the availability of parking and require all new developments in the Borough to be car-free. A Section 106 legal agreement would secure the new building as ‘car-free’ if planning permission were to be granted.
- 7.144 The submitted Healthy Streets Transport Assessment and Travel Plan assess the proposals with regard to transport matters.
- 7.145 All existing car parking will be removed from the Site and no parking is proposed. Capacity has been assessed for disabled parking, and there is existing capacity in nearby blue badge bays which has been agreed at planning application stage. Should a specific need for the Proposed Development arise, a deferred commuted sum would be secured by Section 278 agreement for a single space to be delivered on street.
- 7.146 In terms of overall trip generation arising from the Proposed Development, an overall reduction of 7 movements from the AM peak, and 3 movements in the PM peak have been assessed in the submitted Transport Assessment, prepared by Iceni Projects. Importantly this



includes the complete removal of car journeys from the Site which contains surface level parking which is considered to make a substantial contribution to Camden's ambitions to reduce private car use as a transport mode share.

7.147 In terms of cycle parking, the required number of spaces calculated in accordance with the London Plan for long stay cycle parking are:-

- Student Accommodation – 141 spaces
- Residential homes – 54 spaces
- Flexible commercial spaces – 5 spaces.

7.148 These are provided in dedicated stores, designed in compliance with the London Cycle Design Standard at basement level for the student accommodation, ground level for the residential homes and flexible commercial space. These are provided in the form of two tier racks, larger/accessible CaMden stands, and regular CaMden stands.

7.149 In terms of short stay, the required spaces in accordance with the London Plan are:-

- Student Accommodation – 5 spaces
- Residential homes – 2 spaces
- Flexible commercial spaces – 1 spaces.

7.150 It is proposed that four CaMden stands are to be secured on Jamestown Road through the section 278 agreement to meet the requirement for the eight short stay spaces.

7.151 Overall, Iceni Projects have concluded that the Proposed Development will result in key transport benefits through the removal of all car parking and vehicular access to the Site, it will regularise deliveries and servicing, it will encourage a modal shift towards sustainable transport modes through provide high quality cycle parking. It is considered that the Proposed Development is in accordance with the Development Plan in relation to transport matters.

#### Daylight, Sunlight and Overlooking

7.152 NPPF Paragraph 191 sets out that new development should be appropriate for its location, taking into account effects such as noise, pollution, and loss of daylight, and ensuring these are adequately mitigated to preserve surrounding amenity.

7.153 This is furthered in the Policy D6 of the London Plan which sets out that design of proposed developments should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.



- 7.154 In addition, Policy A1 of the Local Plan seeks to protect the quality of life of occupiers and neighbours. The policy notes that the factors to consider include are: visual privacy and outlook; sunlight, daylight and overshadowing.
- 7.155 In accordance with the above requirements, a Daylight and Sunlight Assessment, prepared by GIA, is submitted as part of this application. It provides full assessment of the impacts to the relevant sensitive receptors. The assessment methodologies have been used for the purposes of analysis:-
- Daylight: Vertical Sky Component (“VSC”) and No Sky Line (“NSL”);
  - Sunlight: Annual Probably Sunlight Hours (“APSH”);
- 7.156 A total of 22 properties were assessed for daylight and sunlight. 14 of these properties meet the BRE Guidelines for daylight and sunlight, the remaining eight properties tested experience reductions beyond the BRE Guidelines, these are:-
- 1) 226 Arlington Road
  - 2) 34 Gloucester Crescent
  - 3) 209 A, B & C Arlington Road (three separate properties)
  - 4) 207 Arlington Road
  - 5) 205 Arlington Road
  - 6) 31 Jamestown Road
- 7.157 These are shown at figure 9 below with numbering.



*Figure 9 – Daylight and Sunlight Sensitive Receptors*

7.158 In assessing the levels of impact of the Proposed Development, GIA have agreed with Camden at pre-application stage that an alternate baseline and target value should be used for assessing impacts. This alternate baseline is for retained VSC values in the “mid teens”, with balconies off if relevant to the property. This has been informed by an audit of surrounding streets and levels of light which existing in the immediate surrounding context.

7.159 Some windows in neighbouring properties are located very close to the Site boundary. A “mirror image massing study” has been prepared to provide an indication of the levels of daylight reduction if development of a similar massing was constructed with the same adjacency from the boundary.

7.160 The majority of the properties which experience daylight losses in excess of the BRE Guidelines, will meet the alternate baseline target of retained VSC values in the mid teens. Two properties experience some reductions beyond the alternate baseline. These are:-

- 205 Arlington Road; and
- 31 Jamestown Road.

7.161 These two properties are discussed in further detail here.

### **205 Arlington Road**

7.162 Within this property, 27 windows have been assessed for VSC. 12 of these windows will meet the BRE Guidelines for VSC. The remaining 15 windows experience greater reductions, 12 of



these windows face directly north over the Site in close proximity to the boundary. Four of these windows have balconies above them which limit the existing levels of light these windows received. Out of the 15 windows, eight will retain the alternate baseline target for VSC. The remaining seven windows experience greater reductions with retained values of 3.7% and 12.2% VSC.

- 7.163 Four of these north facing windows are understood to be dual aspect, with mitigating windows on the western elevation that bring the overall retained VSC for the room in line with the target baseline in the mid teens or above for VSC.
- 7.164 The three remaining windows which are the single aspect, north facing rooms with balconies overhanging the windows, will retain VSC levels between 3.7% and 7.2% (with balconies included in the assessment) which is below the alternate target value for VSC. With the balconies removed from the assessment, the VSC retained values improve to between 11.8% and 16.3%.
- 7.165 A mirror image massing has been tested for this property as a comparison which highlights that there are still significant reductions in VSC albeit they would be lower than those experienced with the Proposed Development in place. The mirror massing comparison has illustrated the significant limitations of the three windows to achieve good daylight with any form of development in place given their layout, aspect and the presence of projecting overhead balconies. Whilst the extent of reductions in daylight to these windows are acknowledged, they are considered to be unavoidable with any meaningful development coming forward on the Site and therefore acceptable in the round.

### **31 Jamestown Road**

- 7.166 This property is in use as a public house with some potential for ancillary residential uses at the upper floors. It has not been possible to secure floor plans however a site visit was carried out to seek to ascertain any potential residential uses associated with the property. Five windows have been which are assumed to be in use as a kitchen, living room and bedroom windows. The remainder have been discounted as they are not considered relevant for daylight/sunlight testing.
- 7.167 Of the wive windows assessed, two will meet or exceed the BRE Guidance. The remaining three windows experience reductions beyond the guidance, with one retaining a VSC level in the mid teens, being the alternate target baseline criteria. This window also features mitigating windows where the room loss overall is considered to be negligible. The remaining two windows will experience greater reductions, serving a small kitchen and a bedroom. These windows retain VSC levels of 11.4% and 13.5% respectively which are only marginally below the alternate baseline target.
- 7.168 A historic baseline and mirror massing assessment have also been considered for this property. The public house was previously abutted by terraced houses right up to the boundary, this massing study as a comparison results in exactly the same levels of daylight



and sunlight reductions when compared to the Proposed Development. The results for the mirror massing test do not result in the same reductions but do lead to some losses in daylight and sunlight as a comparison test.

- 7.169 All tested areas for overshadowing are in compliance with the BRE Guidelines.
- 7.170 Overall, it is considered that the assessment for the Proposed Development as a whole is acceptable in regards to the impacts to daylight, sunlight and overshadowing and in accordance with the Development Plan.

#### Air Quality

- 7.171 Policy SI1 of the London Plan states in order to tackle poor air quality, protect health and meet legal obligations the following criteria should be address development proposals should not lead to further deterioration of existing poor air quality; create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits or, create unacceptable risk of high levels of exposure to poor air quality.
- 7.172 Policy CC4 of the Local Plan states the Council will ensure that the impact of development on air quality is mitigated and ensure that exposure to poor air quality is reduced in the Borough. The policy outlines that 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.
- 7.173 In line with the above guidance, and in support of this application, an Air Quality Assessment, prepared by AQC, concludes that Proposed Development would lead to a significant reduction in trips over the existing building baseline and the number of overall movements is judged to be below the relevant screening thresholds and does not require a detailed air quality assessment in terms of road traffic impacts.
- 7.174 The Proposed Development includes provision of a diesel generator for life safety purposes. Its testing regime means that it will run for approximately 16 hours per year. , the NOx emission rate of the generators is expected to be well below 5 mg/sec when the emissions generated during testing are averaged over a year. In accordance with the relevant screening criteria, the effect on local air quality of emissions associated with the proposed emergency generator testing is considered insignificant.
- 7.175 The Assessment also concludes that the future occupants of the Proposed Development will experience acceptable air quality, and that the Proposed Development will be “air quality neutral” with overall air quality effects being judged to be “not significant”.
- 7.176 It is considered that the Proposed Development is in accordance with the Development Plan as it relates to air quality.



## Noise

- 7.177 Policy D13 of the London Plan establishes the agents of change principle, places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development.
- 7.178 Policy D14 of the London Plan states in order to reduce, manage and mitigate noise to improve health and quality of life, residential and other non-aviation development proposals should manage noise by: avoiding significant adverse noise impacts on health and quality of life; mitigate and minimise the potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development and improve and enhance the acoustic environment and promoting appropriate soundscapes.
- 7.179 On the local level, Policy A4 of the Local Plan states the Council will seek to ensure that noise and vibration is controlled and managed, and planning will not be granted if a development is likely to generate unacceptable noise and vibration impacts.
- 7.180 In support of this application, a Noise Assessment has been prepared by RBA Acoustics. The report assesses the Proposed Development both in terms of the future users and occupiers of the development, and the impact of noise generated from plant from the Proposed Development on nearby sensitive receptors. The Cushla Pub at 29 Jamestown Road has been given consideration in accordance with the agents of change principle as an existing noise generating use.
- 7.181 The plant noise limits based on a background noise survey range between 29 and 38 dB for the south and north of the Site respectively, being 10dB below the background noise level. The proposed plant equipment will be required to comply with these noise levels, with the detail to be controlled by the use of planning conditions.
- 7.182 Noise standards for the Proposed Development have been assessed and established in order to ascertain which windows need to be unopenable to meet relevant acoustic standards, this includes those residential homes which are in proximity to the Cushla Pub when in operation as required by the agents of change principle.
- 7.183 In terms of operational noise arising from the student accommodation, a Student Management Plan, prepared by Homes for Students sets out measures to prevent noise and anti-social behaviour through the presence of on-site security and wardens and standard terms within students licence agreements.
- 7.184 It is considered that the Proposed Development is in accordance with the Development Plan as it relates to noise, and the agents of change principle has been carefully factored in throughout design development.



### Drainage

- 7.185 Policy S1 12 of the London Plan states development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed. In addition, Policy SI 13 outlines the GLA's policy on sustainable drainage and states that proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. The policy suggests proposed drainage should be designed and implemented in ways that promote multiple benefits including increased water use efficiency, improved water quality, and enhanced biodiversity, urban greening, amenity and recreation.
- 7.186 Policy CC3 of the Local Plan sets out that the Council will seek to ensure that development does not increase flood risk and reduces the risk of flooding where possible. The Council will therefore require development to incorporate water efficiency measures; avoid harm to the water environment; consider the impact of development in areas at risk of flooding (including drainage); and, utilise Sustainable Drainage Systems (SuDS) in line with the drainage hierarchy.
- 7.187 The submitted Flood Risk and Drainage Strategy confirms that the Proposed Development will not lead to any increase in flood risk on or off site. In terms of SuDS, measures including an attenuation tank at basement level, and green roofs to reduce surface water run off to 2.0l/s which is the calculated greenfield runoff rate.
- 7.188 The Proposed Development is in accordance with the Development Plan as it relates to flood risk and drainage.

### Biodiversity and Ecology

- 7.189 Section 7 of the Environment Act 2021 sets out the mandatory requirement of biodiversity net gain of 10% on all proposed developments.
- 7.190 At the regional level, Policy G6 of the London Plan states development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain.
- 7.191 Policy A3 of the Local Plan states the Council will grant permission for development unless it would directly or indirectly result in the loss or harm to a designated nature conservation site or adversely affect the status or population of priority habitats and species.
- 7.192 In support of this application, a Biodiversity Matrix and Biodiversity Plan have been prepared by Greengage, and are submitted under separate cover. The matrix sets out the proposed development will have a biodiversity net gain of 3,127%, equating to an uplift of 0.88 habitat units – in line with the Government's mandatory target.
- 7.193 A Preliminary Ecology Appraisal, prepared by Greengage has been carried out which confirms that the site has low potential for nesting birds however further survey work is not required, and recommended details relating to construction management have been made as part of the conclusions. No other protected ecological species were identified as part of the survey.



- 7.194 It is considered that the Proposed Development is in accordance with the Development Plan and relevant legislation relating to biodiversity and ecology.

**Summary**

- 7.195 As demonstrated, the Proposed Development complies with national, regional and local planning policy in relation to these key technical policy areas, as well as others covered in the wider suite of documents prepared and submitted with this planning application. The Proposed Development would provide environmental enhancements and has addressed all relevant environmental assessments and testing required by policy and the Development Plan.



## **8. Planning Obligations and Section 106**

- 8.2 Section 106 of the Town and Country Planning Act 1990 (as amended), allows Local Planning Authorities the power to enter into planning obligations with any person interested in the land in their area for the purpose of restricting or regulating the development or use of the land.
- 8.3 Section 278 of the Highways Act 1980 (as amended) allows Highway Authorities to enter into an agreement if they are satisfied that it will be of benefit to the public for the execution of any works to the highway including maintenance.
- 8.4 The Community Infrastructure Levy Regulations 2010 (as amended) provide a framework for how the Community Infrastructure Levy ("CIL") can be charged. Camden adopted a CIL charging schedule in October 2020.
- 8.5 Paragraphs 55-57 of the NPPF states that Local Planning Authorities should consider whether otherwise unacceptable development could be made acceptable through the use of planning conditions or obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through planning conditions.
- 8.6 Planning obligations must only be sought where they meet all of the following tests:-
- a. Necessary to make the development acceptable in planning terms;
  - b. Directly related to the development; and
  - c. Fairly and reasonably related in scale and kind to the development.
- 8.7 Policy DM1(D) of the Local Plan sets out that the Council will use planning contributions where appropriate to support sustainable development, secure the infrastructure, facilities and services to meet the needs generated by the development, and to mitigate the impact of development.
- 8.8 With this in mind, we and the Applicant's solicitor, Addleshaw Goddard, expect that the following heads of terms would be secured by a Section 106 Legal Agreement. At pre-application stage, several of these financial obligations have been agreed with Camden:-
- Affordable Housing – securing the 27 proposed affordable homes;
  - Car Free Development;
  - Section 278 works (expected to include) and contribution - £44,000\*:-
    - i. Removal of a crossover from Arlington Road and reinstating as footway;



- ii. Alteration of the road layouts to install double yellow lines for loading and unloading on both Arlington Road and Jamestown Road;
  - iii. Provision of four CaMden stands to meet the short stay cycle parking requirements
  - iv. A commuted sum to deliver a blue badge space should need arise from the development in the future;
  - v. Cycle hire/e-scooter bay;
- Pedestrian, cycle and environmental contribution – TBC;
  - Public Open Space Contribution - £367,923.87;
  - Employment and Skills Contribution – approximately £110,000;
  - 17 construction apprenticeships;
  - Apprenticeship support fee - £28,900;
  - Travel Plan Monitoring Contribution - £11,348;
  - Energy and Sustainability Plans;
  - Construction Working Group;
  - Demolition and Construction Management Plan;
  - Demolition and Construction Management Plan Support Contribution - £30,513 ;
  - Construction Impact Bond - £30,000;
  - Carbon offsetting contribution - £61,612;
  - Student management plan;

\*Note that a request for a contribution towards Electric Vehicle Charging was requested but not accepted as the development is car free, and it is not considered that this is in line with paragraph 55 of the NPPF.



## 9. Conclusions

- 9.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004, requires proposals to be determined in accordance with the development plan unless material considerations indicate otherwise. This Planning Statement has assessed the Proposed Development against the development plan and other relevant planning policy and guidance at national, regional and local policy level. Where relevant, emerging policy has been considered and assessed, subject to Paragraph 48 of the NPPF.
- 9.2 The Proposed Development has been developed following thorough and wide ranging consultation with stakeholders at pre-application stage.
- 9.3 The Proposed Development is located in an area of high public transport accessibility and should be optimised in line with national, regional and local policy. The Site presents an opportunity to create a high quality mixed use development on brownfield land, to provide the best use of land on a vacant, underutilised and poor quality set of buildings.
- 9.4 The proposals seek to provide a residential led development which provides purpose built student accommodation in a sustainable location alongside much needed affordable self-contained dwellings which will optimise a prominent derelict, brownfield site and improve its relationship to the wider area through active ground floor frontages and high quality architecture.
- 9.5 The Applicant's vision is to realise the full potential of this vacant, underutilised and inefficient site on the edge of Camden Town and bring forward an exemplar mixed use sustainable scheme with open spaces that contributes positively to the local area.
- 9.6 The Proposed Development has been carefully designed in response to local context by Morris + Company alongside a full design team, to delivery substantial benefits to Camden and London more widely, including:-
- Transformation of a brownfield site for new student accommodation and affordable housing, providing high quality accommodation for London's growing number of students, and much needed social rented homes;
  - Provide 187 student rooms, and 27 affordable homes in the form of high priority unit sizes, equal to delivery of 102 housing units per the Government Housing Delivery Test;
  - Provide exemplar design quality for the residents and students, centred around two courtyards for private amenity space. The development will enhance the streetscape through high quality architectural design which is highly response to context.
  - Retention a portion of flexible commercial space to contribute to the local economy;



- Removal of all car travel to the Site, and implement measures to secure a sustainable mode shift towards active travel, including regularising deliveries and servicing;
- Highly sustainable development, achieving carbon emissions reductions and BREEAM “Excellent” for the student accommodation.

9.7 This Planning Statement and the supporting documents as a whole demonstrates the Proposed Development is in accordance with the Development Plan and the NPPF.

9.8 When talking into account all relevant material considerations, including the relevant policies in draft Local Plan, including the draft Site Allocation and all other relevant guidance, the application should be determined in accordance with the Development Plan, including the “titled balance” in favour of sustainable development. The scheme as a whole represents an exemplary form of sustainable development, and it is considered on this basis that the Proposed Development should be granted planning permission.