

# PLANNING STATEMENT

14 BLACKBURN ROAD  
LONDON  
NW6 1RZ



April 2025

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# 1 Introduction

- 1.1 This Planning Statement has been prepared by SM Planning Ltd on behalf of Hampstead Asset Management Ltd ('the Applicant') and their delivery partner Fifth State, who will be delivering the regeneration proposed at 14 Blackburn Road, London, NW6 1RZ ('the Site').
- 1.2 Fifth State is an innovative development platform delivering community-led, sustainable, mixed-use employment spaces and living accommodation across London. Fifth State are seeking to continue their commitment to investing in and enriching Camden by bringing forward a high-quality, mixed-use development at the Site in partnership with the landowner, Hampstead Asset Management Ltd.
- 1.3 The founding partner of Fifth State, Geoffrey Springer, has been actively developing and working with officers of the London Borough of Camden ('LBC') for over 40 years and is a Camden resident. He has delivered 16 high-quality buildings of various land uses in the LBC, including commercial, residential and mixed-use buildings, care homes and the St Pancras Amateur Boxing Club where Geoffrey is Chairman of the Trustees.
- 1.4 The proposed development will deliver 35 affordable homes, 192 purpose built student rooms, 1,619sqm of commercial space comprising flexible commercial space, and a publicly accessible café. The flexible commercial space will reaccommodate Builder Depot Limited (BDL) who are a family owned and run business that has traded from the Site for over 20 years, with the aim of transitioning from its existing builders merchant operation, to a more retail/showroom focus. This is to facilitate the aspirations of BDL reflective of the emerging context and the residential uses on the upper floors of the proposed development. This space is capable of being subdivided to allow flexibility for smaller showroom/Use Class E units to come forward in response to the changing nature of retail and customer demands.
- 1.5 The Site falls within an area where a wider consented masterplan (The O2 Centre – 2022/0528/P) ('the O2 Masterplan') seeks to provide a comprehensive residential-led mixed-use redevelopment which stretches from West End Lane to Finchley Road and incorporates (from east to west), the O2 Centre, a car park, Homebase store, car showrooms and 14 Blackburn Road. 14 Blackburn Road is within Outline Phase 2 of the O2 Masterplan, referred to as 'Plot S8'.
- 1.6 The application is submitted under Section 62 of the Town and Country Planning Act 1990 (as amended) and seeks full planning permission for:

*'Demolition and redevelopment of the Site for a mixed-use development comprising purpose-built student accommodation (Sui Generis), affordable housing (Use Class C3), lower ground and ground floor flexible commercial/business space comprising of showrooms, retail and ancillary offices (Use Class E/Sui Generis) and a café/PBSA amenity space (Use Class E/Sui Generis) and associated works including service yard,*

*cycle parking, hard and soft landscaping, amenity spaces and plant* ('the proposed development').

Further details of the proposed development are set out within Section 5 of this Statement.

1.7 The proposed development will deliver a significant number of planning benefits, which will serve to enhance the local area and further afield, including:

- The delivery of a major mixed-use development within the West Hampstead Growth Area, contributing to the regeneration of the area and serving to improve upon the O2 Masterplan consent for Plot S8, including the delivery of a greater quantum of affordable homes, family homes, employment generating floorspace, and design interventions to improve the streetscape. It is noted that a section 73 application reference 2025/0484/P has been made to the Council in respect of the O2 Masterplan, which increases the quantum of C3 in the detailed phase (43 units) and reduces it in the outline phases by an equivalent amount. Therefore, it is likely that less residential floorspace will be delivered on S8 under the revised proposals.
- Co-location of affordable homes, student accommodation, and commercial uses, to encourage a mixed and inclusive neighbourhood. A publicly accessible café opening onto external public realm space is proposed for the benefit of residents, student residents, workers and the public, thereby encouraging integration between different communities.
- The delivery of 35 high-quality affordable housing (Class C3) units, which is between 4-8 more affordable homes than the O2 Masterplan consent for Plot S8 (see paragraph 7.27 of this Statement), within a tenure split of 79% social rent and 21% intermediate (by habitable room) on Site, thus exceeding policy compliance. 12 of the affordable homes are for family occupation, which is 5 more affordable family homes than anticipated under the O2 Masterplan consent for Plot S8<sup>1</sup>. The affordable offer comprises 41% by habitable room based on the percentage of the aggregate of the PBSA and affordable housing habitable rooms, which represents a significant contribution towards Camden's affordable housing requirements. The uplift in affordable and family housing may be even more once the O2 Masterplan s.73 is taken into account.
- Provision of 1,619 sqm GIA of flexible commercial floor space comprising of showrooms, retail and ancillary offices (Use Class E/Sui Generis) for use by the existing business at the Site, Builder Depot Ltd, who are a family run business that has operated from the Site for over 20 years. Unlike the O2 Masterplan consent for Plot S8, the proposal will facilitate the retention of BDL's business on Site, this will retain the existing 35 employees on Site, and the 25 employees who undertake deliveries for the store. It also guarantees a long-term occupier for the commercial space, with no risk of occupier voids or vacancies detracting from with the street scene, with heads of terms for a pre-let already having been put in place to BDL.

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<sup>1</sup> As per the DAS Addendum Plot S8 under O2 Masterplan consent

- A significant uplift in employment floorspace compared with both the existing scenario and the O2 Masterplan consent for Plot S8. 1,619 sqm GIA of commercial floorspace is proposed (or 1,742 sqm when taking into account the café space at the base of the PBSA), which is a 979 sqm increase compared with the existing Site, and 569 sqm increase compared with the O2 Masterplan consent for Plot S8. The proposed employment floorspace could generate up to 87 FTE on Site jobs, which is an increase of 52 FTE jobs compared with the existing Site and 27 FTE jobs compared with the O2 Masterplan consent for Plot S8. Approximately £201,000 of annual employee expenditure is expected to be retained locally in Camden as part of the proposed development, representing an increase of approximately £120,000 and £62,000 annually compared with the existing Site and the O2 Masterplan consent for Plot S8, respectively.
- The provision of a shared publicly accessible café and PBSA amenity space at the ground level of the north-eastern corner of the development, opening out onto external public realm space, to facilitate cohesion and integration between PBSA residents, C3 affordable housing residents, workers and the wider existing local community.
- The delivery of high-quality purpose-built student accommodation including 192 student homes, equivalent to an additional 76 residential homes (PBSA counts towards housing completions at a ratio of 2.5:1), in a sustainable location, aligning with the strategic aims of the GLA's PBSA guidance (October 2024). When combined with the affordable homes proposed on Site, the equivalent number of conventional homes proposed on Site is 111, which is between 24-42 more than the O2 Masterplan consent for Plot S8 (see paragraph 7.27-7.29 of this Statement for further detail). The uplift in affordable and family housing may be even more once the O2 Masterplan s.73 is taken into account. The student accommodation will provide a highly accessible location for students to commute to various higher education institutions across London. The student accommodation will make a significant contribution to Camden's housing targets, help to meet the accommodation demand from London's student population, and help free up Camden's existing housing that is currently occupied by students and returned to its original use. Average room sizes of the student rooms will be 18.14 sqm for standard rooms and 25.43 sqm for rooms capable of being occupied by wheelchair users, and internal and external shared amenity space combined at 2.4sqm which is well in excess of best practice examples (with above 1.7sqm generally considered sufficient).
- The delivery of a series of buildings of exceptional design quality, enhancing the character and townscape of the area when contrasted with the existing condition comprising low quality warehouse style buildings. The proposed building's design will respect the significance of the South Hampstead Conservation Area located to the south of the Site.
- The design maximises the active frontages along Blackburn Road in the form of showroom and café shopfronts, and residential accommodation entrances, both with large areas of glazing. In total, the proposal can deliver 122m (78%) of active frontages, which is 10 sqm more than the active frontages within the O2 Masterplan

consent for Plot S8 (with the scenario connecting through to the TfL station). In addition, the proposed development comprises ample street lighting on the building's northern elevation, helping to illuminate the street. A large proportion of the building at ground level steps away from the building line thereby widening the pavements to an average width of 3.5 metres along the building's frontage, exceeding the 2.4 metre pavement width in the O2 Masterplan consent for Plot S8. Overall, these measures seek to significantly enhance the safety of residents and passers-by along Blackburn Road when contrasted with the existing condition with no active frontages, a lack of street lighting, and narrow pavements.

- A high-quality landscape masterplan across the affordable homes and student accommodation, including the provision of landscaped roof terraces, and tree planting. Overall, the scheme achieves an Urban Greening Factor (UGF) score of 0.4 and delivers 1483% of Biodiversity Net Gain.
- The provision of a highly sustainable redevelopment with aspirations to achieve a BREEAM Excellent rating in relation to the student accommodation and commercial premises. Fabric performance and operational energy will exceed the current Building Regulations, while embodied carbon will align with the GLA's targets.
- Substantial socio-economic and community benefits for the local community and wider area, representing an improvement on the O2 Masterplan consent for Plot S8. Approximately £1.183 million of combined annual residential and student expenditure is also expected to be retained in Camden, £96,000 more than expected under the O2 Masterplan consent.
- Significant socio-economic benefits during the construction phase of the development. Construction of the proposed development is expected to generate approximately 429 FTE jobs over the duration of the construction period and approximately £1.99 million in construction employee expenditure over this period, which is expected to be retained locally in Camden.
- Significant Community Infrastructure Levy (CIL) contribution in both Mayoral and Borough CIL.
- The proposed development has been designed to be complementary to the O2 Masterplan, with the Site therefore assisting in achieving a coherent and comprehensive development across the area, as required by the West End Lane to Finchley Road Principles for a New Place SPD (2021).
- Additionally, the Applicant's scheme can be delivered in advance of when Plot S8 under the O2 Masterplan is due to start construction. LandSec's ES (Volume 1 Chapter 5) states that Plot S8 would be delivered in Phase 2B, with demolition in years 3-5 (Fig 5.1) and construction in years 5-8 (Fig 5.2). Whilst the construction programme is identified as commencing in 2023, this is now out of date, so even assuming a start in 2025, this means demolition in 2028 – 2030, and construction 2030 – 2033. The Applicant's construction programme sets construction commencement in June 2027,

and practical completion in December 2029 (30 months). The Applicant's scheme therefore delivers regeneration at least 3 years earlier than the O2 Masterplan.

1.8 This Statement provides details of the proposed development and sets out the planning justification for the proposal through an assessment against the development plan and taking into account any material considerations. The document should be read in conjunction with all other supporting documentation, as follows:

- Location plan
- Site demolition plan by HTA
- Full set of existing plans by HTA
- Full set of proposed plans by HTA
- Schedule of accommodation by HTA
- Design & Access Statement by HTA
- Heritage, Townscape and Visual Impact Statement by The Heritage Practice
- Transport Assessment (including Active Travel Zone Assessment) by RHDHV
- Delivery and Servicing Plan by RHDHV
- Travel Plan by RHDHV
- Outline Construction Logistics Plan by RHDHV
- Construction Management Plan by Tim Cole Consultancy
- Affordable Housing Statement by DS2
- Regeneration Benefits Statement and Employment and Training Strategy by Trium
- Student Housing Management Plan by Homes for Students
- Daylight and Sunlight Assessment by Robinsons Surveyors
- Noise Impact Assessment by Quantum Acoustics
- Air Quality Assessment by Air Quality Consultants
- Basement Impact Assessment by Expedition
- Contaminated Land Assessment by A-squared Studio
- Flood Risk Assessment and Drainage Report by Expedition
- Structural Report by Expedition
- Preliminary Ecological Appraisal by Bradley Murphy Design
- Biodiversity Net Gain Assessment by Bradley Murphy Design
- Landscaping Scheme and UGF Assessment by Bradley Murphy Design
- Energy and Overheating Statement by CGP
- Ventilation and Extraction Statement by CGP
- Utilities Statement by CGP
- Sustainability Statement (including BREEAM) by Jaw Sustainability
- Circular Economy Statement by Jaw Sustainability
- Pre-Demolition Audit by Jaw Sustainability
- Whole Lifecycle Carbon Assessment by Jaw Sustainability
- Aboricultural Impact Assessment by SJ Stephens
- Rapid Health Impact Assessment by Trium
- Fire Statement by Orion Fire Engineering
- Gateway 1 Fire Statement by Orion Fire Engineering
- PBSA Demand Report by Knight Frank
- Security Needs Assessment by Toren



- Statement of Community Consultation by Quatro
- Wind Assessment by RWDI

1.9 An EIA Screening application has been submitted alongside this planning application.

## 2 The Site & Surroundings

### Site Description

- 2.1 The Site is located within LB Camden, an inner London borough divided into 20 member wards. It is located within the administrative ward of West Hampstead which is in the northwestern part of the borough.
- 2.2 The Site is situated to the northeast of West Hampstead station and comprises a roughly rectangular parcel of land measuring 0.24ha. It is occupied by a builders' merchants featuring low-quality buildings (showrooms and sheds) totalling just 640sqm GIA and external yard space of 1600sqm GEA. There is a substation situated in the northeast corner of the Site which will be relocated as part of the proposed development. The Site sits to the rear of properties fronting onto West End Lane in the heart of West Hampstead and extends east-west along Blackburn Road, abutting the railway to the south.

	<b>Existing Site (Builders' Merchants)</b>
<b>Site area</b>	0.24ha
<b>Showrooms</b>	640sqm GIA
<b>External yard</b>	1600sqm GEA

- 2.3 The Site falls within an area where a wider consented masterplan (The O2 Centre – 2022/0528/P) ('the O2 Masterplan') seeks to provide a comprehensive residential-led mixed-use redevelopment which stretches from West End Lane to Finchley Road and incorporates (from east to west), the O2 Centre, a car park, Homebase store, car showrooms and 14 Blackburn Road. 14 Blackburn Road is within Outline Phase 2 of the O2 Masterplan, referred to as 'Plot S8'. The O2 Masterplan is the subject of a s.73 application which is currently pending determination, as discussed further in Section 3 of this Statement.
- 2.4 Planning permission under ref: PWX0202103 was consented in April 2004 for a commercial and residential development at the Site. This planning permission was lawfully implemented as confirmed under ref: 2022/4576/P and remains extant. Further details of this are set out in Section 3.

### Policy Context

- 2.5 In terms of the Site's planning policy context, it is located within the following areas:
- Camden Local Plan Growth Area (West Hampstead)
  - Fortune Green and West Hampstead Neighbourhood Plan Area
  - The area covered by the West End Lane to Finchley Road Principles for a New Place SPD (2021)

- PTAL 6A and 6B
  - Emerging site allocation W2 (WHI2) – O2 Centre, car park, car showrooms and 14 Blackburn Road (Draft New Camden Local Plan)
  - Flood Zone 1
- 2.6 The Site is located adjacent to the West Hampstead Town Centre Boundary (west) and the South Hampstead Conservation Area (south). The buildings on Site are not listed or locally listed. Two listed buildings, Lilian Baylis House (Grade II) and Church of St James (Grade II), are located 68m and 129m southwest of the Site.

### **The Existing Business**

- 2.7 The Site is occupied by BDL which is a family owned and run business that has traded from the Site for over 20 years. BDL currently operates at the Site as a builders' merchants selling a range of own brand as well as branded builders' tools and materials principally to the building trade.
- 2.8 The business' principal clients are small local builders and tradespersons in Camden, undertaking household refurbishment and renovation projects. BDL are partners with their customers and staff. They look after the small tradesmen and small local builders, working off very small margins and want to make sure that their customers are able to make a living.
- 2.9 BDL ensure that their business has a wider positive economic impact as well, working with UK manufacturers and suppliers to produce their own brand products, thus supporting UK jobs in manufacturing and distribution.
- 2.10 BDL has strong community links both in relation to its customer base and its employees. A significant proportion of employees are Camden residents, and some have worked at the store since it first opened in March 2002. BDL guarantees employment to the children of employees. BDL has three generations of families working at the Site. 35 employees work there today, with another 25 employed off-Site, who satisfy deliveries and orders at West Hampstead.

### **Emerging Context**

- 2.11 A collection of landowners are bringing forward comprehensive development proposals for the extensive area stretching from Finchley Road town centre to the east through Blackburn Road to West End Lane (including the O2 Centre and its car park, Homebase retail store and neighbouring Audi/VW car showroom sites). This area is largely covered by the O2 Masterplan and the emerging site allocation W2 (WHI2). The proposals include the O2 Masterplan, the Clockwork Factory apartments at 13 Blackburn Road, an extension of the iQ student accommodation at 15 Blackburn Road, and TfL's proposals for step free access, a public square, and other changes at West Hampstead Station on the corner of Blackburn Road and West End Lane. The emerging context around the Site is in the early stages of transformative regeneration.

- 2.12 The comprehensive redevelopment of the area will create a new residential-led mixed use neighbourhood in respect of which the Site together with TfL's proposals at West Hampstead station will provide a crucial entry point when turning the corner from West End Lane.
- 2.13 The diagram below shows the major emerging context around the Site, with storey heights annotated. There are many tall buildings recently consented along Blackburn Road and beyond. Most of these projects are residential led mixed-use schemes. Surrounding consents and live applications in the immediate area are addressed in Section 3 of this Statement.



- 2.14 As illustrated above, opposite the Site are a number of developments including the part 6, part 8 storey iQ Student Accommodation (at Haywood House, 15 Blackburn Road), 3 storey Clockwork Factory, as well as 5 x three storey residential properties closer to the West End Lane end of Blackburn Road. The Clockwork Factory is subject to a new planning application, proposing redevelopment of the site comprising three residential buildings of up to nine storeys in height and is yet to be determined. The TfL proposals for West Hampstead station are not yet fully developed, but it is not understood that storey heights will be significantly higher than existing.

- 2.15 Further to the east of the Site is the O2 Shopping Centre which contains a mix of uses including retail units, community uses and restaurants, two large commercial super stores, and associated car parking. The O2 Masterplan includes the major redevelopment of the shopping centre.
- 2.16 The Site abuts a new public square / area of public realm to the east to come forward under the O2 Masterplan. It is noteworthy that the Applicant is committed to making proportionate contributions toward the delivery of the public realm immediately east of the Site, as confirmed in later sections of this Statement.

## 3 Relevant Planning History

### The Application Site

- 3.1 Planning application reference PWX0202103 was granted on 6<sup>th</sup> January 2004 for:

*“Redevelopment of whole site by the erection of a 4 storey eastern block comprising two Class B8 and either Class B1 units with associated service yard, together with a 4 storey plus basement western block comprising 8 dwelling houses and 6 self-contained flats with associated underground car parking” (the 2004 Permission)*

- 3.2 Planning permission reference PWX0202103 was lawfully implemented as confirmed under a Certificate of Lawful Development dated 24<sup>th</sup> April 2023 (reference 2022/4576/P).

- 3.3 A S73 application (reference 2023/1292/P) to vary condition 2 (approved plans) of planning permission reference PWX0202103 was granted on 25 July 2024. This included improvements to the façade consisting of design and materiality changes, larger window openings to complement the emerging context, and changes at roof level.

- 3.4 Most recently, a planning application (2024/1145/P) was submitted in March 2024 and validated in August 2024 for:

*“Erection of three floors of commercial floorspace (Use Class (E(g)) over to 5th to 7th floors with cycle parking, and associated works (the proposed development is designed to be developed above the eastern block granted planning permission on 06/01/04 under Ref: PWX0202103 as amended by 2023/1292/P dated 25/07/24 for redevelopment of whole site by the erection of a 4 storey eastern block comprising two Class B8 and eight Class B1 units with associated service yard, together with a 4 storey plus basement western block comprising 8 dwellinghouses and 6 self-contained flats with associated underground car-parking which has been lawfully implemented)”.*

The scheme would sit above the commercial (eastern) block of the 2024 Permission scheme. The application is pending consideration.

### The O2 Masterplan

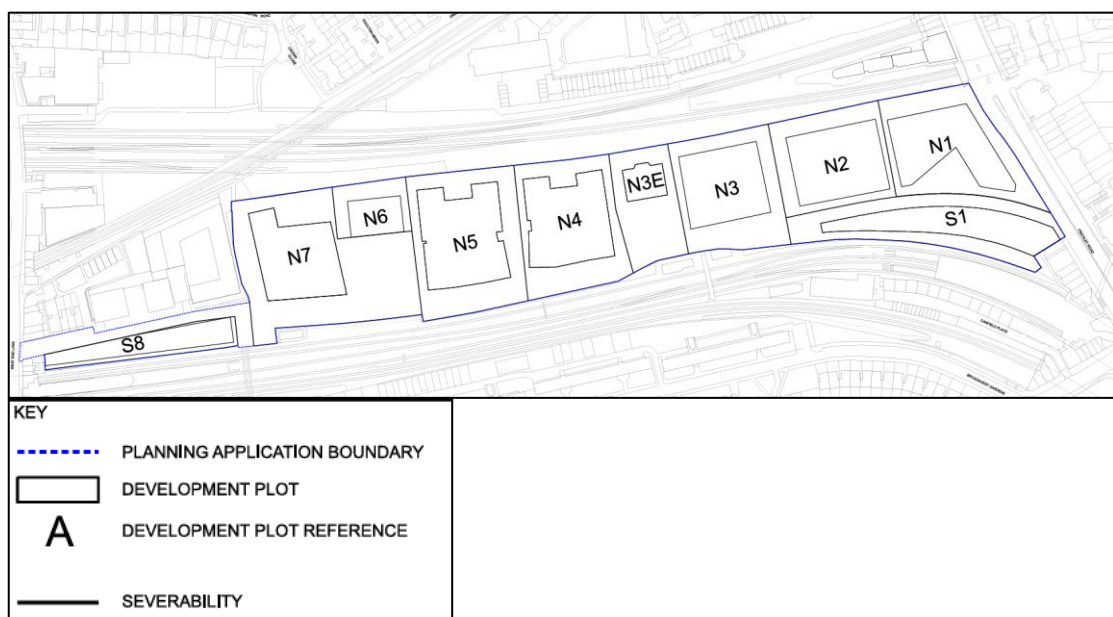
- 3.5 The Council granted a hybrid planning permission (reference 2022/0528/P) ‘the O2 Masterplan’ on 20<sup>th</sup> December 2023, approving a masterplan for a comprehensive residential-led mixed-use redevelopment which stretches from West End Lane to Finchley Road and accommodates (from east to west), the O2 Centre, a car park, Homebase store, car showrooms and 14 Blackburn Road, which is the Site that is subject to this planning application.

- 3.6 The O2 Masterplan is divided into three phases. The first phase of the site (former Homebase store and part of the existing car park) is in detail, while phases 2 and 3 are in outline and require detailed reserved matters submissions. The Site is located within Outline Phase 2 of the O2 Masterplan, referred to specifically as 'Plot S8'.
- 3.7 The O2 Masterplan includes the demolition of all existing structures and redevelopment for residential (Use Class C3), commercial, business and services uses (Use Class E), local community uses (Use Class F2) and Sui Generis leisure uses (including cinema and drinking establishments) together with landscaping, public realm, cycle parking, disabled car parking, highway works and infrastructure.
- 3.8 For the purpose of this planning application, it is important to note that the O2 Masterplan permission envisages a scenario where a slot-in application could come forward on Plot S8 (14 Blackburn Road), see condition I4. Condition I4 states:

*"Severability" Condition – making each plot severable*

*The development hereby permitted shall be built in accordance with the approved Plans (in relation to phase 1) and the approved Parameter Plans (in relation to the Outline phases 2 and 3) listed at Conditions AD1, AD2, and AD3, unless a further planning application specific to one or more of the severable areas shown on Drawing No: 19066 X (00) PO11 Rev. PO1 is submitted to and approved by the Council in substitution for that part of the approved development. If such further planning application is approved, the remaining severable areas may still be developed as approved in this Planning Permission, it being intended that this Planning Permission should permit each severable area separately and severably from the others.*

*Reason: To allow the flexible delivery of the comprehensive redevelopment of the site to achieve the policy objectives in accordance with Camden Local Plan policy G1.*



*Extract of No: 19066 X (00) PO11 Rev. PO1 (Severability Plan) and Key*



## **S73 Application to Vary the O2 Masterplan**

- 3.9 A s.73 application reference 2025/0484/P has been made to the Council in respect of the O2 Masterplan., which seeks approval inter alia for a variation of condition I4 and the approval of a Severability Plan that shows severable plots. The only plot identified as being severable is 14 Blackburn Road ('the Site'). Condition I4 as proposed to be revised states that the O2 Masterplan development is to be built in accordance with the approved plans unless a "further planning permission" specific to 14 Blackburn Road is implemented. If that circumstance transpires then the 14 Blackburn Road permission is substituted for the approved O2 Masterplan development on Plot S8 – the area as shown cross-hatched on the proposed severability plan, and the remainder of the O2 Masterplan can still be developed. The proposed re-wording of condition I4 includes some ambiguities, as it is unclear if the "further planning permission" refers to a future permission such as one granted pursuant to this application, or if it also includes the 2004 and 2024 Permissions, the delivery of which has been assessed in the ES Addendum submitted with the section 73 application. The Applicant has written to the Council providing a consultation response to the section 73 application in that regard.

## **Surrounding Consents & Live Applications**

### **3.10 156 West End Lane**

This site is located approximately 170m north of the application Site. Full planning permission (reference 2015/6455/P) was granted in June 2017 for:

*"comprehensive redevelopment following demolition of all existing buildings to provide 164 self-contained residential dwellings (Class C3), 763sqm of flexible non-residential use (Class A-A3, D1, D2), 1093sqm of employment floorspace (Class B1) and 63sq.m of community meeting space (Class D1) in buildings ranging from 3 to 7 storeys. New vehicular access from West End Lane and provision of 08 accessible car parking spaces. Provision of new public open space and widening of Potteries Path and associated cycle parking and landscaping".*

Construction of this development is complete and in operation.

### **Clockwork Factory Apartments – 13 Blackburn Road**

- 3.11 This site is directly opposite the application Site. Application reference 2020/2940/P was submitted in September 2020, for:

*"Demolition of existing building and construction of three buildings between 1 and 9 storeys (plus basement) in height comprising 53 residential dwellings, 4,797sqm of commercial floorspace, publicly accessible space, landscaping and resident's facilities including cycle and refuse facilities".*

There was a resolution to grant at the planning committee in March 2024 and a decision is yet to be issued.



iQ Student Accommodation, Haywood House, 15 Blackburn Road

- 3.12 This site is to the northeast of the application Site and comprises 347 student beds. Planning permission reference 2017/7072/P was granted on 17<sup>th</sup> May 2023 for:

*“Extensions at roof level to provide 41 additional student studio bedrooms comprising: dormer roof extension to purple block on Blackburn Road; two storey roof extension to red brick block on Blackburn Road; single storey roof extension to middle east seven storey block; and associated alterations including re-cladding existing zinc roof elements, replacement of timber infill panels, alterations to windows, re-cladding of ground floor plinth; and landscaping works to adjacent area. Including resubmission of previously approved common room extension Ref. 2015/5488/P”.*

If the consent is built out, the total number of student bedrooms at Haywood House will be 388.

## 4 Pre-Application Engagement

- 4.1 The NPPF states that, *‘early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community’*.
- 4.2 The Applicant team has undertaken extensive pre-application engagement with the London Borough of Camden (‘LBC’) and other key stakeholders including Transport for London (TfL), Greater London Authority (GLA) and local community groups in the vicinity of the Site, in addition to the proposals being subject to a Design Review Panel (DRP). The pre-application process has helped in to inform, identify and where appropriate, address any issues or concern throughout the pre-application period through to the submission of the application.
- 4.3 A summary of the Applicant’s pre-application engagement and programme of consultation is provided below. Full details of the Applicant’s community consultation are available within the Statement of Community Consultation (SCC) which accompanies the application. The Design and Access Statement also includes a section on Design Evolution, namely how design feedback from the Council and DRP has been addressed.

### Engagement with London Borough of Camden

- 4.4 The Applicant and LBC agreed a Planning Performance Agreement (‘PPA’) for 14 Blackburn Road on the 2<sup>nd</sup> December 2024 to ensure collaborative engagement throughout the duration of the pre-application stage. A series of 6 formal pre-application discussions and workshops with LBC have taken place over the course of 18 months, to ensure the optimal outcome for the Site, and to develop a collaborative and positive relationship between the Applicant and LBC. The pre-application engagement was carried out through a series of in person meetings and workshops at Camden’s offices and online meetings.
- 4.5 A list of the pre-application meetings and each topic addressed is outlined below:
- **Introduction meeting:** Principle of development and land uses; massing; step free access for station platform; affordable housing; Site redevelopment and synchronising with O2 Masterplan permission – 18<sup>th</sup> September 2023.
  - **Follow up to introduction meeting:** Principle of development and land uses; step free access for station platform; construction sequencing and logistics; and design development and massing – 18<sup>th</sup> April 2024.
  - **Design and transport meeting:** Activated street frontage, location of commercial entrances; detailed design and architecture; trees and landscaping; vehicle trip generation for deliveries and servicing, pavement widths, cycle routes and cycle parking – 24<sup>th</sup> October 2024.

- **Transport meeting (online workshop):** Principle of car free development; servicing arrangements; pedestrian environment and requirements; cycle lane; construction management plan; Active Travel Zone (ATZ) assessment scope and TfL station upgrade – 13<sup>th</sup> November 2024.
- **Design meeting:** Height and massing, break between building forms; architectural approach; deck access; C3 lobby space; service yard; cycle parking; retail frontages and landscaping – 23<sup>rd</sup> January 2025.
- **Design meeting:** Height and massing; break between building forms; integration of winter gardens to enclosed floorspace; increased C3 lobby space; increased active street frontage; elevational treatment and fenestration; reduced vehicular access width; cycle lane and route; external lighting and landscaping - 8<sup>th</sup> February 2025.

4.6 The meetings focused on particular topics related to the proposals including principle of development and land use, synchronising with the O2 Masterplan permission, assisting with TfL's aspirations for step free access and station upgrade works, affordable housing, design and massing, activated street frontage, delivery and servicing, cycle routes and parking, neighbouring amenity impact and the quality of the accommodation to ensure the proposals now the subject of this application serve to optimise the Site and derive the maximum planning benefit for the borough. In addition to the above meetings, focussed written advice from internal LBC consultees has also been received on transport and highways, energy and sustainability, air quality and flood and drainage.

#### Design Review Panel

4.7 The design team took the scheme to Camden's Design Review Panel on 29<sup>th</sup> November 2024. The key matters discussed at that meeting and provided within the written feedback included the following:

- **Massing** – height is acceptable but suggestion to break building into two separate elements. Suggestion to increase height of building to compensate for loss of floorspace for separating building mass.
- **Basement** – consider whether this can be reduced to reduce embodied carbon.
- **Public realm** – greater space to the pavement should be considered to improve pedestrian experience along Blackburn Road. Greater thought on how eastern elevation will interact with public space.
- **Design** – a calmer architectural approach should be considered and design/materials should be simplified. Industrial precedents are better suited to side street context – an industrial/warehouse design would be better suited here.

Entrance to C3 units currently results in a lengthy blank façade dominated by access core and bin stores.

- **Sustainability** – consider lower embodied design and materials, water management with blue roofs and more intensive greening of the Site. Planting in more visible locations. Carbon impact needs to be reduced as much as possible in design. Mechanical and electrical plant equipment should be consolidated in one location. A water management strategy needs to be developed to incorporate as much attenuation as possible on Site, including blue roofs.
- **Landscaping** – concerns that street trees will be overshadowed by development. Consider to maximise greenery/biodiversity net gain on Site. Separating buildings into two masses may assist with this.

### Engagement with the Greater London Authority

- 4.8 In addition to meetings with LBC, a pre-application meeting was arranged between the project team and the GLA on 18<sup>th</sup> July 2024 where topics including land use principles, affordable housing, urban design, transport, sustainability and environmental impacts were discussed. The GLA issued a written pre-application response dated 15<sup>th</sup> August 2024 (ref: 2024/0341/P2I) which confirms the GLA's position on these matters.
- 4.9 The GLA were supportive of the proposed development concluding on land use matters that, *'the redevelopment of this brownfield site to provide a student housing-led scheme is supported in land use terms, in line with London Plan Policies H1 and H15'*.
- 4.10 While London Plan Policy H15 requires PSBA to provide the maximum level of affordable student accommodation, the GLA confirmed support for the affordable component to instead be delivered via conventional C3 residential accommodation given Camden's Local Plan makes provisions to allow for this.
- 4.11 In terms of development layout, the GLA highlighted that the existing pedestrian access to the Site is narrow and inhospitable, and that the proposal should seek to improve this, along with providing high quality public realm either on Site or as part of the wider O2 Masterplan.
- 4.12 The GLA acknowledged that the Site has outline consent for a building up to 7 storeys/75.7 AOD (under the O2 Masterplan) and that the proposed development (at that time) seeks to increase the consented heights to 8/9 storeys/80.2 AOD. The GLA confirmed that this modest uplift would be acceptable in principle with regard to the emerging context.
- 4.13 The design of the proposals has been developed and refined in response to LBC and GLA planning officers' and DRP feedback, helping to shape the height, form, layout and detailed design of the proposed development. The detail of this is set out in the Design Evolution section of the Design and Access Statement.

- 4.14 It is also noteworthy that the GLA confirmed support for the optimisation of planning permissions in order to expedite delivery and highlighted the Mayor's clear expectation that variations to existing consents honour existing planning contributions, and that any proposed uplift in development quantum is matched by a commensurate increase in linked contributions. The Applicant is committed to meeting this expectation and subsequent discussions have been had with LBC around honouring the O2 Masterplan obligations (see Section 8 of this Statement), along with appropriate methodologies to calculate commensurate increases to linked contributions. This will be discussed further with LBC officers during the application process.

### **Engagement with Transport for London**

- 4.15 Several pre-application meetings have been held with TfL regarding the Site's proximity to the railway line and also regarding the future proposal to deliver step free access to the platform, and station upgrade works to West Hampstead Underground Station (located to the west of the Site on West End Lane).
- 4.16 The O2 Masterplan permission (specifically 14 Blackburn Road which is within Outline Phase 2 of the O2 masterplan, referred to as Plot S8) had been designed to allow provision of a step free access to the station platform from the Site. However, since the O2 Permission was granted, feasibility work since carried out by TfL, with regard to a proposed step free access to the platform and station upgrade works, do not require any temporary or permanent land acquisition from 14 Blackburn Road. It is understood that the current preferred option by TfL seeks to utilise the existing station site to create a lift/step free access to the platform with more ticket barriers provided within the existing station. Further station upgrade works will utilise TfL owned buildings adjacent to the existing station that front onto West End Lane at the corner with Blackburn Road, to create an additional entrance and public square. TfL are still going through feasibility options for this corner and proposals are currently indicative.
- 4.17 The following sets out a list of the pre-application meetings held with TfL and each topic is addressed is outlined below:
- **Introduction meeting (attended by LBC):** Preferred option for step free access to West Hampstead underground station still subject to feasibility work but options (not utilising 14 Blackburn Road) being considered, application for the Site will need to be supported by detailed Transport Assessment; improvements required for public transport shelters, cycle routes and parking; improvements required locally to public transport infrastructure and recommendation to discuss proposals with Infrastructure Protection team – 24<sup>th</sup> November 2023.
  - **Follow-up/update meeting (attended by LBC):** Update on development proposals to include TfL owned corner site for step free access and station upgrade works, construction sequencing and management to demonstrate continued operation of station and how both sites (14 Blackburn Road and TfL

corner station site) can be, if required, developed independently from one another. TfL presented a step free access option and station upgrade which seeks to utilise and extend the existing station site, 14 Blackburn Road was not required for their proposals – 14<sup>th</sup> May 2024.

- **Follow up meeting:** Update on deck access design. TfL advised that they would be unsupportive of a deck access design to the south elevation due to potential oversail of rail tracks and London Underground infrastructure – 17<sup>th</sup> December 2024.
- **TfL Infrastructure Protection:** Weak bridges/Site route access; external balconies and windows to south elevation; objects being thrown from roof terraces, layout of air source heat pumps and plant to roof; access to 3m buffer strip between proposed building and TfL land and noise impact assessments to ensure acceptable internal noise levels to future occupiers – 13<sup>th</sup> February 2025.

## **Public Consultation & Engagement**

- 4.18 A consultation programme sought to engage with all sections of the community to ensure that as many people as possible had the opportunity to be part of the pre-application process. The public consultation was held between January 2025 and March 2025, and was undertaken through a series of online, in person and postal events and to a number of differing consultation groups. The following sets out the details of these:

### Ward Members

- 4.19 On 13<sup>th</sup> January, emails were sent to the three ward members for the Site introducing the project and asking to arrange a Site tour. One ward member - Cllr Shiva Tiwari - responded and accepted the offer.
- 4.20 On Wednesday 5<sup>th</sup> March, a briefing was provided to Cllr Tiwari. The other two ward members did not attend the briefing on the proposals.

### Community

- 4.21 On 15<sup>th</sup> January, 895 leaflets were distributed for the exhibition held on the 28<sup>th</sup> January, including specifically reaching out to the below community groups. 24 people attended, and while there were some concerns with the proposed density and height, residents were particularly supportive of the proposed café, the affordable homes, re-provision of showroom space in the same location for BDL and the ambitions to improve Blackburn Road for pedestrians and the wider community. See the Quatro report for more details.

- West Hampstead Amenity & Transport

- Community Association for West Hampstead
- Fortune Green and West Hampstead Neighbourhood Development Forum
- Camden Arts Centre
- Sidings Community Centre
- West Hampstead Women's Institute

## 5 The Proposed Development

### Description of Development

- 5.1 Full planning permission is sought for the demolition of the existing buildings at the Site and redevelopment of the Site for a mixed-use development comprising purpose-built student accommodation (Sui Generis), affordable housing (Use Class C3), lower ground and ground floor flexible commercial/business space comprising of showrooms, retail and ancillary offices (Use Class E/Sui Generis) and a café/PBSA amenity space (Use Class E/Sui Generis) and associated works including service yard, cycle parking, hard and soft landscaping, amenity spaces and plant.

### Proposal Breakdown

- 5.2 The proposed development comprises of two distinct buildings that are linked at ground level. The C3 building will be 4-7 storeys including a taller ground floor and the PBSA building will be 10 storeys including a ground floor and amenity mezzanine level. A publicly accessible café will occupy the ground level space at the base of the PBSA.
- 5.3 To deliver the proposed development, the existing substation located in the northeast corner of the Site will be relocated to the southeast corner to the rear of the proposed development away from public vantage points.
- 5.4 The proposed development would deliver:
- 192 purpose-built student accommodation rooms (Sui Generis)
  - 35 affordable homes (C3)
  - 1,619sqm of new and enhanced flexible commercial/business space (Sui Generis/Use Class E) for BDL across the lower ground and ground floors, comprising of show rooms, retail space, ancillary offices and an internal service yard accessed from Blackburn Road. This space is capable of being subdivided to allow for flexibility for smaller retail/Use Class E/sui generis units, to reflect the changing nature of retail and adaptation to customer demands
  - 124sqm publicly accessible ground floor café at the base of the PBSA building (Use Class E/Sui Generis).

### Re-providing Space for the Existing Business

- 5.5 Neither the emerging site allocation W2 (WHI2), nor the O2 Masterplan, propose or provide commitments specific to the reprovision of floorspace for BDL. There is no indication as to where the current family-owned and run business would be decanted to. In the absence of a relocation site, the business would be extinguished and the existing 35 jobs (and another 25 jobs servicing deliveries for the store) lost.



- 5.6 The proposed development comprises 1,619sqm of new and enhanced flexible commercial/business space (Sui Generis/Use Class E) for BDL, comprising of show rooms, retail space, ancillary offices and an internal service yard accessed from Blackburn Road.
- 5.7 The proposed development would facilitate the retention of BDL's business on Site, with a proposed move away from its current builder's merchant operation, to a focus on its operation as a builder's retail store/showroom with ancillary offices. The change in operation facilitates aspirations of the company and creates a more compatible use with the Site, the emerging context and proposed residential uses on the upper floors of the proposed development.
- 5.8 The proposal will replace the existing low-quality commercial buildings with high quality internal commercial spaces that are fit for BDL's operations. In addition, there will be a significant uplift in employment floorspace on Site of 979 sqm. Therefore, whilst existing local employees will be retained through the retention of BDL's business, the significant increase in floorspace will result in an uplift in employment generated on Site.
- 5.9 BDL will use the showroom/retail space to display their goods such as tiling, bathroom and kitchen products. This will provide elegant window displays similar to the front windows of CP Hart (bathroom showroom) or Humphrey Munson (kitchen showroom) in Chelsea and will allow customers to browse and purchase products / place orders at the Site. BDL have operating systems in place at its other branches which will be introduced here to reduce traffic, such as local deliveries for larger items and click and collect for smaller items. BDL has a warehouse and delivery centre in New Southgate (LB Enfield) which satisfies internet and store placed orders, delivering across London to customers. This means stores do not have to carry the full range of products listed for sale on BDL's website. BDL recognise that the context of the Site is changing, a significant amount of new residential development is consented, which if delivered will bring with it a new type of customer. BDL hopes to diversify its customer base towards householders/retail customers, which is reflective of the new showroom/retail focussed store. BDL does not wish to lose its current trade customers of course, and the hope is that they will continue to use BDL either ordering online, or in store for their needs, and having goods delivered.
- 5.10 The owner of BDL has identified land within its own estate on which to temporarily relocate the existing 14 Blackburn Road business during construction of the proposed development. The temporary relocation site is outside of the catchment of the current store so could not be a permanent relocation site, as there would likely be an almost entire loss of the store's goodwill. The business has guaranteed to staff that they will retain their jobs at the temporary relocation site, and when the business returns to 14 Blackburn Road. As most staff live locally in Camden, the business will make travel arrangements for staff to the temporary relocation site.

## Details of Student Accommodation

- 5.11 The PBSA bedrooms sizes range from 17-23sqm and rooms capable of being occupied by wheelchair users are 24-27sqm. There are 24 (12%) rooms capable of being occupied by wheelchair users evenly spread across all floors (3 per floor). All student rooms are 1B1P individual rooms. Each room will have a small kitchenette for cooking and an ensuite bathroom but there are a variety of layouts that will be offered (layout options are set out within the DAS).
- 5.12 The communal facilities will be planned out at a later stage but the proposed development allocates 145.1sqm of internal amenity space at ground floor (including the café) and 160.1sqm at mezzanine level, providing 305sqm total internal amenity space. The proposed development also provides an external amenity terrace for students at level 01 at 145sqm. This means there is 1.6sqm of shared internal amenity per room and 0.8sqm shared external amenity per room.

## Details of Affordable C3 Accommodation

- 5.13 The proposed development would deliver 8 x 1-bed units, 15 x 2-bed units and 12 x 3-bed units. See further details in the table below.

<b>Affordable Tenure</b>	1B2P	2B3P	2B3PW	2B4P	2B4PW	3B5P	3B6P	Total
Social	0	0	4	8	0	6	6	24 (69%)
Intermediate	8	0	0	3	0	0	0	11 (31%)
	8	0	4	11	0	6	6	35

- 5.14 With regard to the above, this equates to:

- Social – 17% 2B3PW, 33% 2B4P, 25% 3B5P and 25% 3B6P
- Intermediate – 73% 1B2P and 27% 2B4P
- X4 M4(3) units (11%)

- 5.15 The C3 affordable accommodation comprises 132 habitable rooms (79% Social and 21% Intermediate), which equates to 41% of the habitable rooms within the development.

## Publicly Accessible Café & Shared PBSA Amenity Space

- 5.16 The proposed ground floor café at the base of the PBSA will provide a high-quality double height amenity space for student use, study and socialising. The café will also be publicly accessible which promotes a vibrant and inclusive atmosphere, connecting

students with the broader community and establishing 14 Blackburn Road as a hub for social engagement.

- 5.17 There are many examples where a café has been incorporated as part of a PBSA scheme to help integrate the development with the wider neighbourhood, for example:
- Fusion Groups Longcross Court in Cardiff, secured planning permission in September 2024, 706 student beds, 143sqm café, 482 sqm commercial space;
  - Unite Students Stapleton House, London, Nando's and Pret on site, as well as community space;
  - Urbanest Vine St, London, 619 student beds, shop/café exhibition space.

### **Amenity Spaces**

- 5.18 The C3 affordable homes have access to a roof terrace on level 06 at 149sqm. Play space for 0-4 year olds will be allocated on the C3 roof terrace and play space for older children will be satisfied with an off-Site contribution.
- 5.19 The PBSA rooms have access to a roof terrace at level 01 at 145sqm. The proposed development allocates 305sqm total internal communal amenity space for the PBSA and includes the publicly accessible café at the base of the PBSA building. As above, this means there is 1.6sqm of shared internal amenity per room and 0.8sqm shared external amenity per room, a total of 2.4sqm of shared amenity space per person.

### **Architecture & Massing**

- 5.20 The proposed development comprises of two distinct buildings that are linked at ground level. The C3 building will be 4-7 storeys including a taller ground floor and the PBSA building will be 10 storeys including a ground floor and amenity mezzanine level. There is a double height space spanning these lower two floors in the café at the base of the PBSA. Active frontage has been maximised at ground floor level with uses including flexible commercial/business space, residential entrances and café space. The café also overlooks the new public realm works to the east, as approved under the O2 Masterplan.
- 5.21 The link between the PBSA and C3 elements would be clad in metal and recessed behind the main building lines and greenery from the PSBA roof terrace would be visible above the parapet.
- 5.22 The proposed development adopts a predominantly brick-based materiality in red/orange tones taking influence from the neighbouring Victorian and Edwardian architecture. Both the PBSA and C3 buildings share a material palette utilising the colours and finishes in different ways to accentuate the difference between the high street and railway influences in the area.
- 5.23 The C3 element sits on a Glassfibre Reinforced Concrete (GRC) base to delineate the shopfronts and the PBSA element accentuates the ground floor with brickwork arches and darker columns. The arches at ground floor evoke the neighbouring railway arches

occupied with commercial space. The animation and expression of the internal service yard has also been carefully considered to ensure that an active frontage is achieved while maintaining the practical functions of protecting and securing the area for loading while screening it from the public realm. Contemporary laser cut metal fretwork has been proposed which is designed in reference to the area's industrial heritage. It is anticipated that this would involve an element of artist collaboration.

- 5.24 The building form of the C3 element drops down towards West End Lane to keep within the heights of the neighbouring buildings on the High Street. It drops down again to form an external amenity terrace for future residents. The C3 element is separated into smaller vertical components, each framing the width of a home behind. Each C3 unit is dual aspect.
- 5.25 Two sets of air source heat pumps have been provided, one on the roof of the C3 element and one on the roof of the PBSA element enabling both elements to operate separately. Repeated pitched roofs across the scheme help to conceal plant on the roof.
- 5.26 Please refer to the submitted Design and Access Statement (DAS) by HTA for more detailed information and illustrations, including how the design has been developed through pre-application engagement and in response to DRP feedback.

### **Parking & Servicing**

- 5.27 The proposed development is car free and includes on-Site servicing facilities for the commercial element, incorporating two loading bays with sufficient clearance for another servicing vehicle to wait within the Site. Additionally, the scheme proposes an on-street loading bay on Blackburn Road at the western end of the Site, which has been agreed with LBC.
- 5.28 In alignment with the O2 Masterplan, no disabled parking is proposed at the Site but a contribution can be made towards provision of one blue badge space on street subject to feasibility and agreement with LBC.
- 5.29 In terms of long stay cycle parking spaces, x173 would be provided for the PBSA, x80 for the residential (C3) element and x6 for the commercial use (with x2 of these provided for the Café element). Short stay cycle parking is provided for all uses in suitable publicly accessible locations adjacent to the proposed building, totalling x38 spaces. The proposed short and long stay cycle parking provision accords with the uplift from London Plan requirements set out in the Camden Local Plan.
- 5.30 The proposed landscaping treatment includes delivery of some public realm at the eastern end of the Site and considers on-street cycle facilities to align with the parameters established within the outline consent for the O2 Masterplan.

## **Pedestrian Amenity, Public Realm & Landscaping**

- 5.31 The proposed development provides additional clearance at the Blackburn Road frontage of the Site to facilitate delivery of generously dimensioned high-quality pedestrian amenity. The existing pavement widths are around 1.8m in most places. By pulling back the building line at ground floor level, the proposed development achieves a pavement width of 4.1m at its largest points, 2.4m at its smallest pinch points and 3.5m width across the majority of the pavement.
- 5.32 The proposed development will activate the street along Blackburn Road with a commercial frontage, large areas of glazing and a café overlooking the new public realm to the east, to come forward as part of the O2 Masterplan. The proposed café/PBSA amenity space includes an outdoor seating area which has been designed to blend seamlessly with the public realm, and which will further contribute to a vibrant street frontage where ground floor uses will have a strong interaction with the street.
- 5.33 To the west elevation, the proposal has also been designed to adapt to several scenarios including one where a building entrance has been designed to facilitate a connection to a public square (potentially envisaged as part of TfL station works).
- 5.34 The biodiversity strategy has been informed by the submitted Preliminary Ecological Assessment that identifies opportunities for habitat creation and enhancement for the proposed development. This includes a large expanse of green roofs across the proposed development and landscaped amenity spaces featuring hedges, shrub planting and climbers. Due to underground constraints, including existing and proposed drainage and utilities, trees will be planted in large, attractive and movable planters to introduce greenery while maintaining flexibility. Collectively, these habitats will improve connectivity through the Site and will contribute to a wider vision of urban greening and biodiversity enhancement.

## **High-Level Comparison with O2 Masterplan**

- 5.35 The proposed development will be consistent with the Design Code established under the O2 Masterplan to ensure the proposal aligns with the rest of the masterplan and contributes positively to the coherent and comprehensive redevelopment of the area. This has regard to cycle routes, pavement widths, shared surfaces, reduced vehicular use around the Site, prioritising emergency access and refuse collection over private vehicles on Blackburn Road and active frontage at ground level interspersed with residential entrances and amenity. Please see page 11 of the DAS for further information.
- 5.36 The proposed development strictly follows all parameters set out in the approved parameter plans under the O2 Masterplan permission, exceeding only the height parameter in some locations to achieve the parapet articulation as expressed in the permission and to respond to taller developments in the immediate context. In line with the O2 Masterplan parameter plans, a 3m no structure buffer zone is located along the south side of the Site which restricts the maximum footprint. Please see page 10 of the DAS for further information.

- 5.37 The Planning Assessment set out at Section 7 of this Statement, where relevant, provides a comparative analysis of the benefits of the proposed development compared to Plot S8 of the O2 Masterplan.
- 5.38 The proposed development would honour the planning contributions to be delivered by the O2 Masterplan and the uplift in development quantum will be matched by commensurate increases in any linked contributions. This will further ensure that the proposed development would contribute positively to the extant masterplan. Please see the Heads of Terms set out later in this Statement for details on the expected S106 contributions.
- 5.39 For full details and illustrations of the proposed development please refer to the Design and Access Statement by HTA that supports the application.

## 6 Planning Policy Context

- 6.1 This Section provides an overview of legislative provisions along with the national, regional and local planning policy and guidance relevant to the determination of this planning application.

### **Legislation**

#### Planning and Compulsory Purchase Act 2004

- 6.2 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.

#### Planning (Listed Buildings and Conservation Areas) Act 1990

- 6.3 Section 66 of the Planning (Listed buildings and Conservation Areas) Act 1990 (as amended) sets out that special regard must be given to the preservation of a listed building, its setting or features of special architectural or historic interest.
- 6.4 Section 72 of the Planning (Listed buildings and Conservation Areas) Act 1990 (as amended) requires the Council to pay special attention to the desirability of preserving or enhancing the character or appearance of a conservation area.

### **National Planning Policy Framework (2024) (NPPF)**

- 6.5 The National Planning Policy Framework (December 2024) originally published on 27 March 2012 sets out the Government's overarching strategic planning policies for England. The NPPF is a material planning consideration in decision making. The NPPF requires Local Planning Authorities (LPAs) to adopt a positive approach to decision taking and to apply a presumption in favour of sustainable development.
- 6.6 The aim of the NPPF is to proactively deliver sustainable development to support the Government's housing and economic growth objectives and meet the needs of the present without comprising the ability of future generations to meet their own needs.
- 6.7 Paragraph 8 sets out the three dimensions of sustainable development: 'economic' to help build a strong and competitive economy; 'social' to support strong communities and ensuring that a sufficient number and range of homes to meet the needs of present and future generations; and 'environmental' in protecting and enhancing the environment.
- 6.8 Amongst wide ranging national policies contained within the NPPF, it is noteworthy that Paragraph 63 states that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies, including those who require affordable housing, as well as students. Paragraph 71 sets

out that mixed tenure schemes can provide a range of benefits, including creating diverse communities and supporting timely build out rates, and local planning authorities should support their development through decisions. Mixed tenures sites are those that include a mix of ownership and rental tenures as well as housing designed for specific groups such as student accommodation.

- 6.9 Paragraph 85 requires planning decisions to help create the conditions in which businesses can invest, expand and adapt, taking into account both local business needs and wider opportunities for development.
- 6.10 Paragraph 90 requires planning decisions to support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaption, recognising that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.
- 6.11 Paragraph 96 requires decisions to achieve healthy, inclusive and safe places, which promote social interaction – for example through mixed use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages.
- 6.12 Paragraph 117 states that applications for development should give priority to pedestrian and cycle movements and facilitate access to high quality public transport, creating places that are safe, secure and attractive.
- 6.13 Paragraph 124 requires decisions to promote an effective use of land in meeting the need for homes and other uses, whilst safeguarding and improving the environment and ensuring safe and healthy living conditions. Paragraph 125 requires decisions to give substantial weight to the value of using suitable brownfield land for homes, and states that proposals should be approved unless substantial harm would be caused, with support given to the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land is constrained, and available sites could be used more effectively.
- 6.12 Paragraph 129 notes that decisions should support development that makes efficient use of land, taking into account the need for different types of housing, local market conditions, availability of infrastructure and services, maintaining the prevailing character and securing well designed places.
- 6.13 Paragraph 135 requires developments to add to the overall quality of the area, ensuring developments are sympathetic to local character and built environment. Paragraph 137 states that applications that can demonstrate early, proactive and efficient engagement with the community should be looked on more favourably than those that cannot.



## **The Development Plan**

- 6.14 For the purposes of this application, the development plan comprises the London Plan (2021), Camden's Site Allocations Plan (2013), the Camden Local Plan (2017) and the Fortune Green and West Hampstead Neighbourhood Plan (2015).

### London Plan (2021)

- 6.15 The London Plan (2021) (hereafter 'the London Plan'), sets out the city's strategic planning objectives, providing a comprehensive framework for London's economic, environmental, and social development over the next 20 to 25 years. Local development plans, such as the Camden Local Plan, must align with the London Plan to ensure a cohesive approach to meeting the city's needs.
- 6.16 A key principle of the London Plan is promoting 'Good Growth,' which seeks to create inclusive and sustainable environments both socially and economically. Policy GG2 (Making the Best Use of Land) prioritises the development of successful, sustainable mixed-use spaces by:
- Focusing on brownfield sites, particularly in Opportunity Areas;
  - Encouraging development in well-connected locations with strong public transport links;
  - Maximising land use to support more housing and workspaces;
  - Supporting higher-density developments in areas with good access to jobs, services, and amenities via public transport, walking, or cycling;
  - Using a design-led approach to optimise site capacity;
  - Enhancing walking, cycling, and public transport networks to facilitate car-free living and efficient land use.
- 6.17 Policy H1 (Increasing Housing Supply) underscores the importance of expanding London's housing stock by setting ten-year net housing completion targets for each local authority. LBC's target for 2019/20 to 2028/29 is 10,380 new homes. The supporting text to Policy H1 acknowledges that non-self-contained student housing contributes to these targets, with 2.5 student bedrooms equating to one conventional home in strategic planning terms.
- 6.18 Policy H15 (Purpose-Built Student Accommodation) encourages local authorities to meet both local and citywide demand for student housing. It advocates for PBSA in areas with strong walking, cycling, and public transport links, ideally as part of mixed-use regeneration and redevelopment projects. Student housing, whether in PBSA or shared conventional accommodation, is recognised as part of London's overall housing need, as defined by the 2017 London Strategic Housing Market Assessment (SHMA). While the SHMA primarily assesses housing needs in terms of conventional self-contained units, Policy H15 confirms that PBSA also contributes to meeting this demand. Therefore, new PBSA developments count towards London's overall housing targets rather than being considered an additional requirement. This is emphasised

within the recently published Purpose-built Student Accommodation LPG (November 2024).

6.19 The London Plan sets an annual target of 3,500 new PBSA bed spaces up until 2041, equating to 88,500 new bed spaces from 2016 to 2041. This target, based on student population forecasts and a 2018 accommodation needs assessment by the Greater London Authority (GLA), was reviewed during the adoption process. The more recently published Purpose-built Student Accommodation LPG (November 2024) highlights continuous rise in higher education student numbers in London and emphasises the role that PBSA can have in achieving housing and releasing conventional homes onto the market.

6.20 The London Plan policies considered most relevant to the assessment of this planning application are as follows:

- GG1: Building strong and inclusive communities
- GG2: Making the best use of land
- GG3: Creating a healthy city
- GG4: Delivering the homes Londoners need
- GG5: Growing a good economy
- GG6: Increasing efficiency and resilience
- SD6: Town centres and high streets
- SD7: Town Centres: development principles and Development Plan Documents
- D1: London's form, character and capacity for growth
- D2: Infrastructure requirements for sustainable densities
- D3: Optimising site capacity through a design led approach
- D4: Delivering good design
- D5: Inclusive design
- D6: Housing quality and standards
- D7: Accessible housing
- D8: Public realm
- D9: Tall buildings
- D10: Basement development
- D11: Safety, security and resilience to emergency
- D12: Fire safety
- D13: Agent of Change
- D14: Noise
- H1: Increasing housing supply
- H2: Small sites
- H4: Delivering affordable housing
- H5: Threshold approach to applications
- H6: Affordable housing tenure
- H10: Housing size mix
- H15: Purpose-build student accommodation
- E11: Skills and opportunities for all
- HC1: Heritage conservation and growth
- HC3: Strategic and local views
- G4: Open space

- G5: Urban greening
- G7: Trees and woodlands
- SI 1: Improving air quality
- SI 2: Minimising greenhouse gas emissions
- SI 4: Managing heat risk
- SI 7: Reducing waste and supporting the circular economy
- SI 12: Flood risk management
- SI 13: Sustainable Drainage
- T1: Strategic approach to transport
- T2: Healthy streets
- T4: Assessing and mitigating transport impacts
- T5: Cycling
- T6: Car parking
- T7: Deliveries, servicing and construction

#### Camden Local Plan (2017) ('CLP')

6.21 The CLP sets out the LBC's vision for the borough through 5 strategic objectives and associated planning policies to achieve this, covering the period from 2016-2031. The Council seeks to maximise the supply of housing, exceeding the target of 16,800 homes by 2030/31, including 11,130 additional self-contained homes. Within this target, LBC will also aim to maximise the supply of affordable homes to exceed the borough wide strategic target of 5,300 additional affordable homes by 2030/31 and ensure an appropriate mix of affordable housing types to meet the needs of households unable to access market housing. LBC will also seek a supply of student housing to meet or exceed its target of 160 additional places in student housing per year and protect premises or sites that are suitable for continued business/employment use.

6.22 The CLP policies considered most relevant to the assessment of this planning application are as follows:

- G1: Delivery and location of growth
- H1: Maximising housing supply
- H2: Maximising the supply of self-contained housing from mixed-use schemes
- H4: Maximising the supply of affordable housing
- H6: Housing choice and mix
- H7: Large and small homes
- H9: Student housing
- H4: Maximising the supply of affordable housing
- C1: Health and wellbeing
- C5: Safety and security
- C6: Access for all
- E1: Economic development
- E2: Employment premises and sites
- A1: Managing the impact of development
- A2: Open space
- A3: Biodiversity
- A4: Noise & vibration

- A5: Basements
- D1: Design
- D2: Heritage
- CC1: Climate change mitigation
- CC2: Adapting to climate change
- CC3: Water and flooding
- CC1: Climate change mitigation
- CC2: Adapting to climate change
- CC3: Water and flooding
- CC4: Air quality
- CC5: Waste
- CC3: Water and flooding
- CC4: Air quality
- CC5: Waste
- TC1: Quantity and location of retail development
- TC2: Camden's centres and other shopping areas
- TC4: Town centre uses
- T1: Prioritising walking, cycling and public transport
- T2: Parking and car-free development
- T3: Transport infrastructure

Fortune Green & West Hampstead Neighbourhood Plan (2015) ('NP')

6.23 The NP was prepared in the context of now superseded national, regional and local policy. Nevertheless, it broadly aligns with the aims and objectives of the later development plan documents. The NP states that between 2010 and 2031, the West Hampstead Growth Area shall be promoted for a mix of uses including housing, employment, town centre and public/community uses. It confirms the expectation that this area will see 1,000 new homes and 7,000sqm of business floorspace. The NP confirms that any redevelopment of 14 Blackburn Road should be primarily residential with appropriate affordable housing, and with employment use on the ground floor.

6.24 The NP policies considered most relevant to the assessment of this planning application are as follows:

- 1: Housing
- 2: Design & character
- 3: Safeguarding and enhancing Conservation Areas and heritage assets
- 4: West Hampstead Growth Area
- 5: Public transport
- 7: Sustainable transport
- 8: Cycling
- 9: Pavements & pedestrians
- 12: Business, commercial and employment premises and sites
- 17: Green/open space
- 18: Trees

- 6.25 In addition to the statutory Development Plan, the following documents may be relevant and can be material considerations in determining the planning application.

### **Draft new Camden Local Plan**

- 6.26 The Council consulted on the Draft new Camden Local Plan ('the emerging plan') from 17<sup>th</sup> January 2024 to 13<sup>th</sup> March 2024. The Council are currently considering all the responses received and will publish an updated version of the emerging plan for further consultation in Spring 2025.
- 6.27 Due to the early Regulation 18 stage of the emerging plan, it is considered that limited weight can be afforded to the emerging policies and allocations.
- 6.28 The emerging plan sets out the LBC's vision for future development in Camden for the next 15 years and includes the planning policies and site allocations to help achieve this. The Council will aim to deliver 11,550 additional homes over the Plan period to 2041. The emerging plan confirms support for the London Plan's strategic target for 50% of all new homes to be genuinely affordable. LBC will aim to maximise the supply of affordable housing, meet or exceed a borough wide strategic target of 3,000 additional affordable homes from 2026/27-2040/41, and achieve an appropriate mix of affordable housing types to meet the needs of households unable to access market housing. The emerging plan also confirms that LBC will seek a supply of student housing to meet or exceed the Council's target of 200 additional places in student housing per year and will protect premises or sites that are suitable for continued business/employment use.
- 6.29 The emerging policies considered most relevant to the proposed development are as follows:
- DS1: Delivering healthy and sustainable development
  - W1: West Camden
  - H1: Maximising housing supply
  - H2: Maximising the supply of self-contained housing from mixed use schemes
  - H4: Maximising the supply of affordable housing
  - H6: Housing choice and mix
  - H7: Large and small homes
  - H9: Student housing
  - CC1: Climate change mitigation
  - CC2: Repurposing, refurbishment and re-use of existing buildings
  - CC3: Circular economy and reduction of waste
  - CC4: Minimising carbon emissions
  - CC6: Energy reduction in new buildings
  - CC7: Heat networks
  - CC8: Overheating and cooling
  - CC9: Water efficiency
  - CC10: Sustainable design and construction certification
  - CC11: Flood risk

CC12: Sustainable drainage  
 IE1: Growing a successful and inclusive economy  
 IE4: Affordable and specialist workspace  
 IE6: Supporting town centres and high streets  
 SC1: Improving health and wellbeing  
 SC3: Open Space  
 NE1: The natural environment  
 NE2: Biodiversity  
 NE3: Tree protection and planting  
 NE4: Water quality  
 D1: Achieving design excellence  
 D2: Tall buildings  
 D3: Design of housing  
 D5: Heritage  
 D6: Basements  
 A1: Protecting amenity  
 A2: Safety and security  
 A3: Air quality  
 A4: Noise and vibration  
 T1: Safe, healthy and sustainable transport  
 T2: Prioritising walking, wheeling and cycling  
 T3: Public transport  
 T4: Shared transport infrastructure and services  
 T5: Parking and car-free development

- 6.30 The Site is located within the emerging site allocation W2 (WHI2) - O2 Centre, car parks, car showrooms and 14 Blackburn Road. The Applicant has submitted a representation on the Draft new Camden Local Plan to request that WHI2 is more flexible to allow student housing to come forward to align with the broader aims and objectives of the Development Plan, emerging plan and to meet an identified need. The representation also highlights that so long as 'slot-in' applications adopt a collaborative and coordinated approach between landowners and other stakeholders, they can contribute to an integrated and comprehensive development across the wider site allocation.

### **National Guidance**

- National Planning Practice Guidance (PPG)
- Nationally Described Space Standards (2015)
- National Design Guide (2021)
- National Model Design Code (2021)
- Historic England Tall Buildings Advice Note (2022)

## **London Plan Guidance**

- Purpose-built Student Accommodation LPG (November 2024)
- Characterisation and Growth Strategy LPG (June 2023)
- Optimising Site Capacity: A Design-led Approach LPG (June 2023)
- Planning for Equality and Diversity in London SPG (October 2007)
- Accessible London SPG (October 2014)
- London View Management Framework SPG (March 2012)
- Play and Informal Recreation SPG (September 2012)
- Social Infrastructure SPG (May 2015)
- Digital Connectivity Infrastructure LPG (November 2024)
- 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)
- Sustainable Transport, Walking and Cycling LPG (March 2023)
- Housing Design Standards LPG (June 2023)
- Housing SPG (March 2016)
- Draft Affordable Housing LPG (May 2023)
- Draft Fire Safety LPG (February 2022)

## **Camden Planning Guidance (CPG)**

- Access for All (March 2019)
- Air Quality (January 2021)
- Amenity (January 2021)
- Basements (January 2021)
- Biodiversity (March 2018)
- Design (January 2021)

- Development Contribution (March 2019)
- Digital Infrastructure (March 2018)
- Employment Sites and Business Premises (January 2021)
- Energy Efficiency and Adaptation (January 2021)
- Housing (January 2021)
- Planning for Health and Wellbeing (January 2021)
- Public Open Space (January 2021)
- Student Housing (March 2019)
- Town Centres and Retail (January 2021)
- Transport (January 2021)
- Trees CPG (March 2019)
- Water and Flooding (March 2019)



## 7 Planning Assessment

- 7.1 The law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise.
- 7.2 This section provides a planning assessment of the proposed development against relevant policy, guidance and any material considerations. It is considered that the main determining issues against which the application will be assessed are as follows:
- Principle of Development
    - Demolition
    - PBSA (Sui Generis) & Self-Contained Homes (Class C3)
    - Commercial Space (Use Class E/Sui Generis)
  - Affordable Housing
  - Housing Mix & Tenure
  - Housing Quality
  - Design & Comprehensive Development
  - Accessibility
  - Tall buildings
  - Fire Safety
  - Townscape, Heritage and Views
  - Open Space, Trees and Landscaping
  - Children's Play Space
  - Biodiversity & Ecology
  - Urban Greening Factor
  - Transport & Highways
  - Energy & Sustainability
  - Basement Impact
  - Flood Risk & Drainage
  - Other Environmental Considerations
    - Air Quality
    - Noise and Vibration
    - Wind Microclimate
    - Daylight, Sunlight and Overshadowing
  - Health Impact
  - Regeneration benefits

### **Principle of Development**

- 7.3 The Site is brownfield land, with very low-density development near to several rail and tube stations and well connected with bus routes. The use of highly accessible brownfield sites for the delivery of new housing is promoted and supported by paragraphs 124-125 of the NPPF which deals with 'making effective use of land'. Reference is made in paragraph 125(d) to use of under-utilised sites, especially if this would meet identified needs for housing and in locations where land supply is

constrained. Camden Local Plan policies are in accordance with the NPPF in this respect and seek to direct growth to the most sustainable locations.

- 7.4 The Site is identified in Camden's Local Plan (2017) (CLP) and the Fortune Green and West Hampstead Neighbourhood Plan (2015) (NP) as being within a key growth area, where the most significant growth in the borough is expected to be delivered.
- 7.5 CLP Policy G1, emerging Policy DS1 and the emerging site allocation WHI2 advocates a mix of uses in this area. These objectives are reiterated within the West End to Finchley Road SPD. NP Policy 4 also seeks to direct development to the growth area and promotes a mix of uses, including new homes and business/employment space.
- 7.6 In seeking to direct new development to the growth area, the principle of a proposed mixed-use redevelopment comprising student accommodation (Sui Generis), affordable housing (Use Class C3) and flexible commercial/business space at lower ground and ground floor (Use Class E/Sui Generis) would therefore align with the aims of the above development plan policies and the emerging plan.
- 7.7 It should be noted that the proposed development would constitute a significant uplift in overall conventional housing numbers compared to the extant permission ref: PWX0202103 and Plot S8 of the O2 Masterplan. Furthermore, the proposed C3 accommodation (35 units) is 100% affordable, meaning the proposed development would also deliver an uplift in affordable housing numbers of more than Plot S8 of the O2 Masterplan could deliver based on the maximum overall C3 unit numbers that could be delivered within the parameters of the O2 Masterplan and applying the 35% affordable housing threshold. Therefore, the proposed development would make a greater contribution to meeting overall housing targets and maximises the delivery of affordable housing in line with the aims of the London Plan, CLP, NP, emerging plan and the NPPF. This is discussed further below along with our workings.
- 7.8 Additionally, neither the emerging site allocation W2 (WHI2), nor the O2 Masterplan, propose or provide commitments specific to the reprovision of floorspace for the existing business on site for BDL. There is no indication as to where the current successful family-owned and run business would be decanted to. In the absence of a relocation site, the business would be extinguished and the existing 35 local jobs (and another 25 jobs servicing deliveries for the store) lost. This is clearly contrary to the provisions of the CLP, emerging plan and the NPPF, as addressed below. The proposed development would reaccommodate the existing business, providing enhanced commercial space comprising of showrooms/retail space and ancillary offices to meet the company's aspirations, thereby protecting the existing business and creating the conditions in which it can invest, expand and adapt. The proposed development constitutes an enhancement from the O2 Masterplan in terms of an uplift in commercial floorspace and accommodating the existing business on Site.

#### Demolition

- 7.9 The existing structures/buildings on Site could not be repurposed for residential use or other uses that would fit in with the proposed scheme and are not suitable for reuse. It

is noteworthy that the demolition of these buildings has been granted under previous planning permissions including the extant full permission ref: PWX0202103 and the O2 Masterplan.

- 7.10 In addition, a pre-demolition audit accompanies this application which establishes materials that are currently present in the building and identifies opportunities for re-use and recycling of these materials. The audit confirms that the project is targeting a landfill diversion rate of 95% in the majority of waste groups through a combination of re-use, recycle and recovery.
- 7.11 Given the above, it is considered that the demolition of the existing buildings/structures is acceptable and would enable the delivery of significant regeneration benefits. The West End Lane to Finchley Road Principles for a New Place SPD (2021) supports the regeneration of the area.

#### PSBA (Sui Generis) & Self-Contained Homes (Class C3)

- 7.12 Paragraph 61 of the NPPF confirms that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. The aim should be to meet an area's identified housing need, including with an appropriate mix of housing types for the local community.
- 7.13 Paragraph 63 of the NPPF places an importance on housing of all types for different groups in the community, including students. Paragraph 71 sets out that mixed tenure schemes can provide a range of benefits, including creating diverse communities and supporting timely build out rates, and local planning authorities should support their development through decisions. Mixed tenure sites are those that include a mix of ownership and rental tenures as well as housing designed for specific groups such as student accommodation. In line with this policy, the proposed development includes a mix of housing types for different groups, including affordable homes (Class C3) and PBSA (Sui Generis), thus responding to the needs of different groups and assisting the creation of a diverse and thriving community.
- 7.14 Paragraph 74 of the NPPF confirms that small and medium sites can make an important contribution to meeting the housing requirement for an area, are essential for SME housebuilders to deliver new homes, and are often built-out relatively quickly. To promote the development of a good mix of sites, local planning authorities should (amongst other provisions) support small sites to come forward for housing and work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes. In line with this policy, the Site is 0.24 hectares and the Applicant's scheme can be delivered in advance of when Plot S8 under the O2 Masterplan is due to start construction, as addressed at paragraph 1.7 of this Statement.

- 7.15 Paragraph 124 of the NPPF requires decisions to promote an effective use of land in meeting the need for homes and other uses, whilst safeguarding and improving the environment and ensuring safe and healthy living conditions. Paragraph 125 requires decisions to give substantial weight to the value of using suitable brownfield land for homes, and states that proposals should be approved unless substantial harm would be caused, with support given to the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land is constrained, and available sites could be used more effectively. In line with these policies, the Site constitutes brownfield land and the proposed development makes effective use of this land in meeting local needs, while providing a high-quality development that would safeguard and improve the environment and provides for safe and healthy living conditions.
- 7.16 London Plan Policy H1 sets out a pressing need for more homes, setting a minimum ten-year target for the borough of Camden of 10,380 dwellings. The supporting text (paragraph 4.1.9) identifies that non-self-contained accommodation for students counts towards meeting this housing target, with 2.5 student bedrooms equating to one conventional home in strategic planning terms. Therefore the proposed development will assist in meeting Camden's housing target both in its delivery of C3 affordable homes, and student accommodation.
- 7.17 London Plan Policy H15 also highlights the local and strategic need for PSBA, recognising that at neighbourhood level, such development can contribute to a mixed and inclusive neighbourhood. The supporting text (paragraphs 4.15.1 and 4.15.2) identifies the importance that PBSA has in contributing to meeting London's overall housing need, highlighting a requirement for 3,500 PBSA bed spaces to be provided annually. The proposed development will assist in meeting London's housing needs, and in particular provide a contribution towards the PBSA bed spaces requirement.
- 7.18 The London-wide and localised need for student accommodation is further supported by the submitted PBSA Supply and Demand Report which confirms that:
- An estimated 93,194 PBSA bed spaces across London represents just 26.5% of total full-time students. This equates to a gross ratio of 3.8 students per bed space (0.27 bedspaces per student).
  - There are 4,999 full time students living within a one-mile radius of Blackburn Road.
  - Within a one-mile radius of Blackburn Road, there are 639 PBSA bed spaces, representing 12.8% of full-time students living within the catchment. This equates to a gross ratio of 7.8 students per bed space (0.13 bed spaces per student). It should be noted that all 639 of these bed spaces were constructed pre-2012, demonstrating the lack of new, high quality PBSA within the catchment.
  - There are no PBSA schemes in the pipeline (under construction, with planning permission, or in planning) within the one-mile radius.
  - PSBA supply will continue to accommodate a maximum of just 12.7% of full-time students living in the immediate area, assuming no growth in student population. The

population of full-time students living within the one-mile catchment area has increased by 18.3% since 2018/19 and therefore this is unlikely.

- It is highly unlikely that PBSA supply will keep pace with demand within the local area, and the wider areas of North London and as a result of this imbalance, it is likely students will continue to place more unwanted pressure on the local private rented market.

- 7.19 The London student accommodation market remains fundamentally undersupplied. As a result, for the foreseeable future the majority of students will live in rented flats and houses, the latter often large family homes converted to HMOs, and often in conditions well below their expectations and removing supply of private rental properties from the general housing market. Accordingly, there is a continuing demand for carefully managed all-inclusive PBSA as reflected within the Mayor's Purpose-Built Student Accommodation LPG (November 2024) ('PBSA LPG') (notably paragraph 2.1). The proposed development assists in achieving this policy aim.
- 7.20 The PBSA LPG was prepared to support decision makers in the application of London Plan Policy H15 (Student Accommodation). It highlights a continuous rise in higher education student numbers in London and emphasises the role that PBSA can have in achieving housing and releasing conventional homes onto the market. The proposed development is consistent with this policy aim.
- 7.21 The PBSA LPG reinforces how PBSA can help meet housing delivery targets through directly housing students and indirectly through helping to alleviate pressure on traditional rented homes. It recognises that there is a desire to have more predictable bills, and dedicated study, sleeping and social spaces that are well designed and maintained, and that PBSA has more potential to attract students out of the private rental sector, alleviating demand pressures. It further highlights that a lack of PBSA supply relative to growing numbers of students, is contributing to competition and higher rents in the private rental market, whilst also acknowledging that PBSA can support delivery of overall housing numbers whilst meeting an important segment of need. The proposed development will assist in achieving these policy aims.
- 7.22 CLP Policy H1 confirms that LBC will aim to exceed a target of 16,800 additional homes from 2016/17-2030/31. The Council will seek to exceed this target, particularly for self-contained homes by regarding self-contained housing as the priority land use of the Local Plan and resisting alternative development of sites identified for housing or self-contained housing through a current planning permission or a development plan document unless it is shown that the site is no longer developable for housing (amongst other provisions). CLP Policy H4 confirms that the Council will aim to maximise the supply of affordable housing and exceed a borough wide strategic target of 5,300 additional affordable homes from 2016/17-2030/31. NP Policy 1 seeks residential development to provide a range of housing types, to meet a range of needs, as appropriate, related to the scale of the development.
- 7.23 CLP Policy H2 states that LBC will promote the inclusion of self-contained homes as part of a mix of uses. In all parts of the borough the Council will encourage the inclusion

of self-contained homes in non-residential development and in the Central London Area and specified town centres. Where development involves additional floorspace of more than 200sqm (GIA), the Council will require 50% of all additional floor space to be self-contained housing. For the avoidance of doubt, the Site is not located within a town centre albeit that it lies adjacent to the West Hampstead Town Centre boundary, which is not a town centre listed in this policy. The proposed development includes self-contained homes as part of a mix of uses consistent with policy.

- 7.24 The corresponding policies of the emerging plan (H1, H2 and H4) remain wholly in line with the above CLP Policies.
- 7.25 CLP Policy H6 and the emerging plan Policy H6 seek to create mixed, inclusive and sustainable communities by seeking a variety of housing suitable for Camden's existing and future households. Draft Local Plan Policy H6 is worded favourably towards student housing, stating that the Council will encourage PBSA where this will assist the creation of mixed, inclusive and sustainable communities. The proposed development complies with these policies, as discussed in further detail below.
- 7.26 CLP Policy H9 seeks to ensure that there is a supply of student housing in the borough by seeking to meet or exceed Camden's target of 160 additional places in student housing per year and supporting development that includes student housing. It states that the Council will support student housing provided that the development:
- a) will not involve the net loss of 2 or more self-contained homes;*
  - b) will not prejudice the Council's ability to meet the target of 742 additional self-contained homes per year;*
  - c) will not involve a site identified for self-contained housing through a current planning permission or a development plan document unless it is shown that the site is no longer developable for self-contained housing....*

The above also aligns with the emerging Policy H9 (Student Housing).

- 7.27 With regard to the above criteria, criterion (a) is not relevant as the Site does not currently accommodate any self-contained homes. With regard to the remaining criteria, it is clear that London Plan and CLP Policies support the provision of student housing and identify that student housing contributes towards housing supply at a ratio of 2.5:1. The proposed development would deliver 192 student homes and 35 affordable homes, which using the London Plan 2.5:1 ratio for housing targets, equates to the delivery of 111 conventional (C3) homes. This would ensure the development contributes towards the Council's ability to meet their housing targets under criterion (b), and is unlikely therefore to prejudice the Council's ability to meet its target of 742 additional self-contained homes per year. As referred to above, the proposed development is likely to come forward in advance of when Plot S8 would be delivered as part of the O2 Masterplan. Practical completion is currently programmed for December 2029. Therefore, the proposed development would be likely to support Camden's target delivery of homes for the year 2029.

- 7.28 In relation to criterion (c), the extant full permission at the Site (ref: PWX0202103) includes 14 residential units (C3) and as such, the proposed development would result in a significant uplift (97) in overall housing numbers compared to this permission. Moreover, it is of significance to note that regarding the O2 Masterplan permission, the maximum residential floorspace for Plot S8 (14 Blackburn Road) is 8,400sqm (which equates to 7.3% of the total residential floorspace (115,000sqm) for both outline phases). Applying this to unit numbers, this would equate to the maximum delivery of 87 residential units (based on 7.3% of the maximum 1,188 residential units in the outline phases). However, the application documents under the O2 Masterplan provide indicative proposals for each outline plot and confirms Plot S8 is expected to deliver a total of 69 homes<sup>2</sup>. As such the proposals would result in an uplift (between 24-42 units) in overall housing numbers on the Site compared to the O2 Masterplan. As set out in Section 3 of this Statement, the live S73 application to vary the O2 Masterplan includes an uplift in residential floorspace within the detailed element, which, if approved, means there would be a corresponding reduction in maximum residential floorspace deliverable within the Outline Elements of -5,774sqm. Therefore, if approved, the variation could only result in a reduction of housing numbers on Plot S8.
- 7.29 Furthermore, assuming affordable housing would be provided at 35% of the maximum possible 87 (or 69) residential units on Plot S8 on the O2 Masterplan, this equates to 31 (or 24) affordable C3 units. The proposed development would deliver 35 affordable C3 homes and thus also provides enhancement in terms of affordable housing delivery which the Council seek to maximise in order to meet pressing needs and tackle the housing crisis.
- 7.30 Given the above, while the proposed development involves a site identified for self-contained housing through a current planning permission or a development plan document, it is clear that the aims and objectives of this criterion are to ensure proposals for student housing do not prejudice the council's ability to meet their targets for self-contained housing. As above, it has been confirmed that the proposal would make a greater contribution to meeting targets for conventional (C3) homes, in line with the aims of CLP Policy H9 criterion (c) and the wider development plan policies.
- 7.31 The proposed development would therefore provide an enhancement in terms of its contribution to meeting the identified need and associated targets for both market and affordable C3 homes, while also contributing to meeting the identified needs and targets for PBSA. The proposed C3 and PBSA accommodation would better contribute to creating a diverse, mixed and inclusive neighbourhood, particularly given the significant number of new C3 homes to come forward in the immediate area under the O2 Masterplan and the proposed variation of it, which is seeking a further uplift of residential floorspace in the detailed element. The principle of the proposed PBSA and C3 housing is therefore wholly in line with the aims and objectives of the development plan, the emerging plan and the NPPF. Namely, London Plan Policies H1 and H15, CLP Policies H1, H2, H6 and H9, emerging policies H1, H2, H5 and H6, and paragraphs 61, 63, 71, 74, 124 and 125.

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<sup>2</sup> As per the DAS Addendum Plot S8 under O2 Masterplan consent

7.32 CLP Policy H9 continues, advising that Student Housing will be supported provided development:

- d) complies with any relevant standards for houses in multiple occupation (HMOs);*
- e) serves higher education institutions that are accessible from it;*
- f) includes a range of flat layouts including flats with shared facilities wherever practical and appropriate;*
- g) has an undertaking in place to provide housing for students at one or more specific education institutions, or otherwise provide a range of accommodation that is affordable to the student body as a whole;*
- h) will be accessible to public transport, workplaces, shops, services, and community facilities;*
- i) contributes to creating a mixed, inclusive and sustainable community; and*
- j) does not create a harmful concentration of such a use in the local area or cause harm to nearby residential amenity.*

*Where proposed student housing development is not robustly secured as student housing that provides accommodation affordable to the student body in accordance with criterion (g), the Council will expect the development to provide an appropriate amount of affordable housing for general needs having regard to Policy H4 Maximising the supply for affordable housing.*

The above aligns with the emerging Policy H9 (Student Housing).

7.33 London Plan Policy H15 (Purpose-built student accommodation) includes similar criteria, confirming that boroughs should seek to ensure local and strategic needs for PSBA is addressed, provided that:

- 1) At the neighbourhood level the development contributes to a mixed and inclusive neighbourhood*
- 2) The use of the accommodation is secured for students*
- 3) The majority of the bedrooms in the development including all of the affordable student accommodation bedrooms are secured through a nomination agreement for occupation by students of one or more higher education provider*
- 4) The maximum level of accommodation is secured as affordable student accommodation...*
- 5) The accommodation provides adequate functional living space and layout*

The policy continues to confirm that student accommodation should be delivered in locations well-connected to local services by walking, cycling and public transport, as part of mixed-use generation and redevelopment schemes.

7.34 In line with GLA and LBC criteria set out above, the student accommodation has been designed to meet standards and provide a good mix of flat layouts to ensure good quality accommodation, as discussed in further detail in the relevant sections of this Planning Assessment.



- 7.35 The Applicant is proposing to deliver the affordable component via conventional C3 accommodation, offering 35 units within a tenure split of 24 Social units (69% by unit / 79% by habitable room) and 11 Intermediate units (31% by unit / 21% by habitable room) exceeding Camden's tenure split requirement. Notwithstanding criterion 4 of London Plan Policy H15 as set out above, CLP Policy H9 allows for student housing provision which does not secure affordable student accommodation (ASA) to deliver an appropriate amount of affordable housing for general needs. As such, the GLA confirmed support for this approach within the pre-application response for the proposed development ref: 2024/0341/P21.
- 7.36 The Applicant is proposing to deliver the affordable component via conventional C3 accommodation and the student units will be provided as direct lets at market rent. Indeed, the CLP allows the provision of C3 accommodation as an alternative to ASA, which is also supported by the GLA in this case. The submitted PBSA Supply and Demand Report demonstrates a clear need for the PBSA and the proposed number of conventional and student accommodation units would contribute positively to meeting housing targets.
- 7.37 In line with GLA and LBC criteria, the Site is located in a highly accessible location (PTAL rating 6a and 6b) and is therefore in a location strategically preferable for student accommodation and is coming forward as part of a mixed-use redevelopment scheme, in a neighbourhood that is coming forward with a mix of uses.
- 7.38 In terms of ensuring mixed and inclusive neighbourhoods (H15 (1)) and preventing an overconcentration of PBSA at a neighbourhood level (H9 (j)), the PSBA LPG (2024) provides useful context and guidance on these points. Section 2.3 of the LPG confirms that London's universities are disproportionately concentrated in a few areas, which has resulted in PSBA clusters in similar areas. Several boroughs have sought to limit further growth in PBSA in these areas, reflecting their concerns about housing mix in their neighbourhoods and the potential 'crowding out' of conventional housing, given other types of housing need amongst their population. PSBA in relation to housing mix can be considered in two ways:
- In support of PBSA proposals that help disperse from traditional concentrations to alternative, suitable locations – such as adding an element of student housing to existing residential stock that is primarily conventional housing.
  - As a more negative consideration, where there are long-standing or more recent concentrations of PBSA, relative to conventional housing. An over-concentration may be spatial (clusters of PBSA in particular neighbourhoods) or as a proportion of housing delivery, where PBSA may be considered to be 'crowding out' conventional housing schemes.
- 7.39 The PBSA LPG (2024) continues, highlighting that PBSA should be part of a wider positive strategy in delivering mixed and inclusive neighbourhoods in most Local Plans. What is considered an appropriate balance of PBSA and conventional housing will differ across London, and within boroughs. It states that Local Plans should identify if and where spatial concentration of PBSA, or proliferation of PBSA delivery compared

to conventional housing delivery, is impacting the ability to ensure mixed and inclusive neighbourhoods. It confirms that policies could (amongst other provisions):

- indicate thresholds of concern (i.e. the proportions of student housing relative to conventional housing, that would likely be considered harmful, and the reasons for this)
- positively encourage PBSA in specific places or character areas where it may be more easily absorbed and achieve wider benefits – including as part of areas of mix-use regeneration
- on larger sites, where appropriate, consider conventional housing alongside PBSA, recognising the need for both.

7.40 Paragraph 2.3.4 of the PBSA LPG (2024) confirms that in the absence of such policies, account should be taken of evolving infrastructure, character and growth contexts as investment occurs and overall housing stock increases.

7.41 Section 2.4 of the PBSA LPG (2024) has regard to integrating PBSA with the neighbourhood. It confirms that creating mixed and inclusive neighbourhoods is also about ensuring different land uses and housing types knit together to create successful, welcoming places that can be enjoyed by all. For PBSA, this means considering how to contribute to place-making at this scale through the mix of uses, design and management of the accommodation. Incorporating publicly accessible uses (such as shops and services, open space and community facilities) within the development can help ensure PBSA blocks are not seen as exclusive and/or lacking relevance for the local community. They also help ‘capture’ student spending power in a way that can contribute to town-centre vitality and viability.

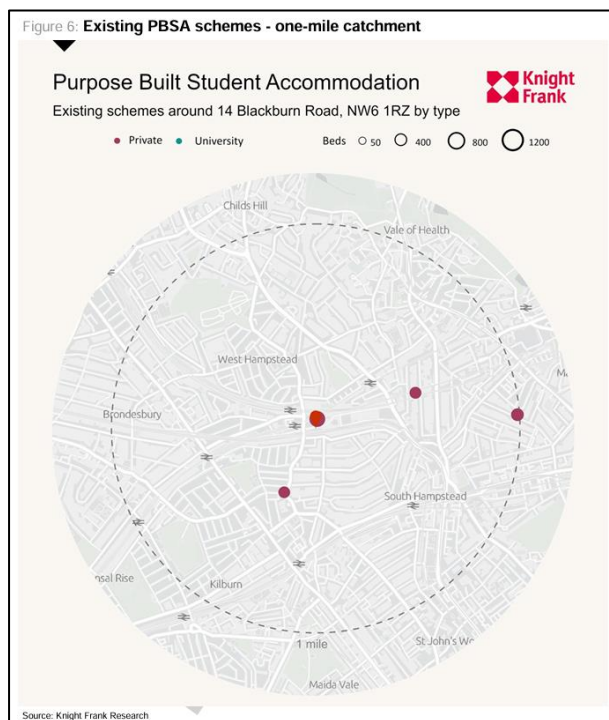
7.42 With these points considered, it should be noted that the submitted PBSA Supply and Demand Report identifies a clear increase in student numbers and a significant shortfall of PBSA within a one-mile radius of Blackburn Road. The development would therefore meet an identified demand for such accommodation at the neighbourhood level.

Furthermore, in terms of PBSA as a proportion of overall housing and considering the evolving context, the PBSA Supply and Demand Report confirms that within a one-mile radius of the Site, there are a total of 639 PBSA bed spaces, including those at iQ Students, Haywood House opposite the Site (see extract from PBSA Supply and Demand Report showing location of PBSA within 1-mile radius overleaf). In this connection, it should be noted that around 1800 residential (C3) units will come forward under the O2 Masterplan alone (based on a maximum residential floorspace of 171,784 sqm GIA of residential floorspace). In addition to this, within a 1-mile search radius of the Site, the following site allocations from the emerging local plan have been identified:

- W4: 13 Blackburn Road – indicative capacity of 24 additional C3 dwellings
- W5: 188-190 Iverson Road – indicative capacity of 15 additional C3 dwellings
- W6: Meridian House – indicative capacity of 12 additional dwellings

- W8: Land at Midland Crescent / Finchley Road – indicative capacity of 9 additional C3 homes and 60 student rooms or equivalent floorspace
- W9: BP Petrol Station, 104A Finchley Road – indicative capacity of 30 C3 dwellings
- W10: Abbey Co-Op Housing Site – indicative capacity of 65 C3 dwellings
- W11: 100 Avenue Road – indicative capacity of C3 184 dwellings
- W12: Former Liddell Road Industrial Site – indicative capacity of 106 additional C3 dwellings

7.43 Additionally, there is a large modern development at 187-199 West End Lane which delivered 198 C3 dwellings to the west of the Site (subject of application ref: 2011/6129/P) which was completed circa 2017. It is also understood that 164 C3 dwellings have recently been completed at 156 West End Lane (subject of application ref: 2015/6455/P). There are also of course numerous windfall developments for C3 residential developments in the immediate surroundings, including several major C3 developments approved in the last 5 years. In comparison, there are no draft allocations for student accommodation other than the 60 student rooms 'or equivalent floorspace' under W8 above. There also appear to be no recent consents for student accommodation within a one-mile radius of the Site other than the extension to iQ Students opposite the Site, which has already been taken into account within the identified PBSA numbers within a one-mile radius.

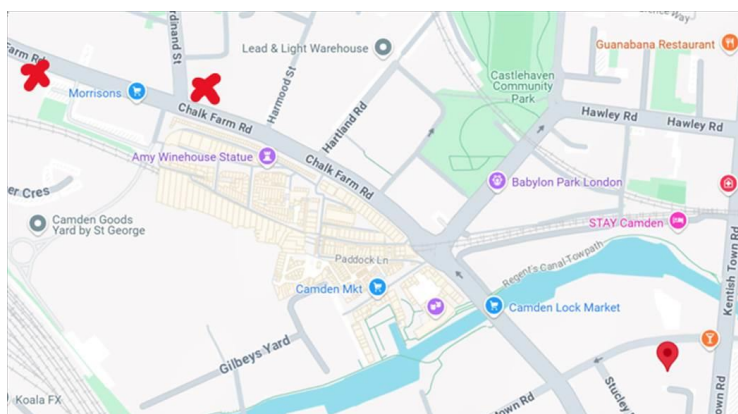


*Extract from PBSA Supply and Demand Report showing location of PBSA within 1-mile radius*

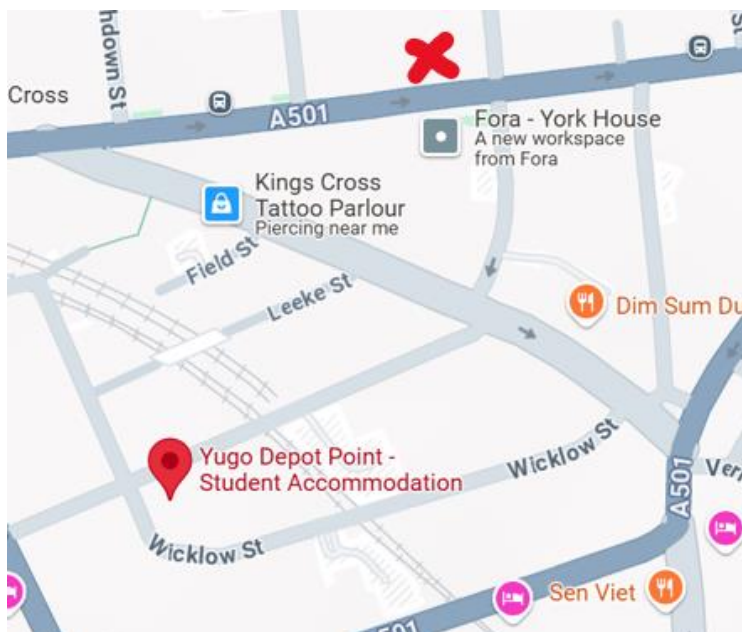
- 7.44 Spatially, two blocks of student housing (the Site and iQ Students) is a very small cluster and would not result in the crowding out of conventional housing at the neighbourhood level. Plenty of new C3 accommodation is coming forward in the immediate area and the above shows the existing location of PBSA around the Site.
- 7.45 There are other similar clusters in Camden, such as existing PBSA block at 34 Chalk Farm Road (the Stay Club Camden) (X on Map 1 below) and in September 2024 Camden granted planning permission at 100 Chalk Farm Road for 264 PBSA beds plus 30 affordable C3 units (marker on Map 1 below). 13 Hawley Cresnet PBSA also isn't far from this location (see market on Map 2 below). Depot Point 15-17 Britannia Street (shown by a maker on the Map 3 below) and Chapter Kings Cross, Pentonville Road (marked with an X on Map 3 below) also have a close spatial relationship.



Map 1 – Stay Club Camden (X) and 100 Chalk Farm Road (marker)



Map 2 - 13 Hawley Cresnet PBSA (marker) in context with Chalk Farm Road PBSA (X)



Map 3 – Depot Point PBSA (marker) and Chapter Kings Cross PBSA (X)

- 7.46 Given the existing context of PBSA relative to conventional housing, together with the number of C3 units coming forward under the emerging context and the small proportion of PBSA in comparison, it is considered that the proposed PBSA would contribute to a mixed and inclusive neighbourhood. There would not be an overconcentration of PSBA or ‘crowding out’ of conventional housing at the neighbourhood level, as a proportion of housing overall, or spatially.
- 7.47 The proposed PBSA is coming forward as part of a wider mix-use regeneration within the O2 Masterplan area, where PBSA can be more easily absorbed and achieve wider benefits. The proposed development (which includes conventional housing), together with iQ Students, will represent an element of PSBA within a residential stock that is primarily conventional housing.
- 7.48 Finally, it is considered that the proposed mix of uses, the separate C3 and PBSA blocks, the identified level of PBSA relative to conventional housing and the submitted Student Management Plan, would ensure that the proposed PBSA would not cause harm to residential amenity.
- 7.49 For the reasons set out above, it is considered that the proposed PSBA (together with the proposed self-contained housing) would accord with the aims and objectives of the development plan and emerging policy. The proposed land use is therefore acceptable in principle, as confirmed by the GLA during pre-application engagement.

#### Commercial Space (Use Class E/Sui Generis)

- 7.50 Paragraph 85 of the NPPF confirms that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant

weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The proposed development supports the aims of this policy.

- 7.51 London Plan Policy GG2 aims to create successful sustainable mixed-use places that make the best use of land, whilst Policy GG5 seeks to promote and enable the continued development of a strong and competitive economy across London, highlighting that development must seek to ensure that London's economy diversifies. The proposed development supports the aims of this policy.
- 7.52 London Plan Policy E2 states that Boroughs should include policies in local Development Plan Documents that support the provision, and where appropriate, protection of a range of B Use Class business space, in terms of type, use and size, at an appropriate range of rents, to meet the needs of micro, small and medium-sized enterprises (SMEs) and to support firms wishing to start-up or expand. Development of B Use Class business uses should ensure that the space is fit for purpose having regard to the type and use of the space. The proposed development includes ancillary office and storage space as part of the proposed commercial / sui generis floorspace and is therefore consistent with the aims of this policy. Moreover, BDL can be considered a SME and is seeking to upgrade its floorspace and expand its operation in this location where it has an established presence.
- 7.53 CLP Policies E1 and E2 seek to support the provision of new employment space and to protect existing employment space. NP Policy 12 reflects these aims and identifies a presumption in favour of retaining existing employment sites. The proposed development conforms with these policies, it protects existing employment space, upgrades that space to modern occupier standards, and includes flexibility to alter and subdivide the internal space to meet the needs of a range of different future possible occupiers, so future proofing the employment space and seeking to ensure that it remains relevant, occupied and retains an active frontage on Blackburn Road.
- 7.54 The CLP encourages active frontages which respond positively to the street. Paragraph 7.11 states that, *"Active frontages are building facades that allow people on the street to see inside the building. A more active type of frontage is one where the use opens out to the street, like a shop with a window display and entrance, or a use like a café or restaurant with outdoor dining. Active frontages add interest and vitality to public spaces. Views into buildings provide interest to passers-by and views out of buildings provide safety through passive surveillance or 'eyes on the street'. Positive factors for frontages are entrances, shop fronts and windows."* The proposed development conforms with this policy, it includes a series of shopfronts, a café with outdoor seating, as well as glazed PBSA and C3 entrances allowing views into and out of the building.
- 7.55 CLP Policy TC4 confirms that the Council will seek to ensure the development of shopping, services, food, drink, entertainment and other town centre uses does not cause harm to the character, function, vitality and viability of a centre, the local area or the amenity of neighbours. CLP Policy TC5 supports small and independent businesses. It is not considered that the café proposed will cause the harm described in policy TC4. It will add to the vitality of the area, be of benefit to the C3 and student

residents, as well as the wider community, and will help to create an inclusive neighbourhood.

7.56 The Site is occupied by a builders' merchants (BDL) which is a family owned and run business that has traded from the Site for over 20 years. BDL is a builders' merchants selling a range of own brand as well as branded builders' tools and materials principally to the building trade. Further detail on the existing business is detailed at Section 2 of this Statement. BDL has 4 stores, all in London, and is considered a SME and independent business. BDL should therefore enjoy the support of Policy TC5.

7.57 The existing use of the Site could be considered a sui generis or Class E use. The officer report under the O2 Masterplan defines the builder's merchant yard at 14 Blackburn Road as Use Class E(a). However, paragraph 10.6 of the officer report states:

*"The builders' merchant is around 640sqm in terms of rateable space (and around 1,600 sqm in GEA floor area for the sheds) but it is just outside the West Hampstead Town Centre. Taking the occupied retail space in the O2 (10,747sqm), the Homebase (4,084sqm), and the builders' merchant (640sqm), the total existing retail space is about 14,831sqm. However, the nature of the builders' merchant is more akin to employment uses for the purposes of the plan, rather than standard retail"*

7.58 The proposed development seeks to provide 1,619sqm of new and enhanced flexible commercial/business space (Sui Generis/Use Class E) for BDL across the lower ground and ground floors, comprising of show rooms, retail space, ancillary offices, back of house facilities, and an internal service yard accessed from Blackburn Road. This space is capable of being subdivided to allow for flexibility for smaller retail/Use Class E/sui generis units, to reflect the changing nature of retail and adaptation to customer demands, as recognised in the O2 Masterplan officer report. The proposed 1,619sqm of flexible commercial/business space is an increase to the maximum permitted for Plot S8 under the O2 Masterplan (1,050sqm).

7.59 In addition to the above, the proposed development would deliver a 124sqm publicly accessible ground floor café at the base of the PBSA building (Use Class E/Sui Generis).

7.60 Neither the O2 Masterplan permission nor Draft Site Allocation W2 (WHI2), propose or provide commitments specific to the reprovision of floorspace for BDL. There is no indication as to where the current business would be decanted to. In the absence of a relocation site, the business will be extinguished and the existing 35 jobs at the store, and further 25 employees who fulfil orders and deliveries would be lost. This is clearly contrary to the provisions of the CLP, emerging plan and the NPPF. Current and emerging policy seeks to support existing local businesses, as well as their expansion and economic growth. This aligns with the proposed development.

7.61 The proposed development would reaccommodate the existing business on Site, albeit without the builders' merchants' yard and instead for a builder's retail store/showroom

use with ancillary offices, protecting the local business and giving clarity and commitment (both in terms of the quality and type of floorspace required) for their operation, and a timescale for delivery. The proposed development would therefore allow BDL to remain at the Site albeit with a more retail/showroom focus to how the Site is currently used, which both meets the aspirations of the company, the emerging context and proposed residential uses on the upper floors of the proposed development.

- 7.62 BDL will use the enhanced showroom/retail space to display their goods such as tiling, bathroom and kitchen products. This will provide elegant window displays similar to the front windows of CP Hart (bathroom showroom) or Humphrey Munson (kitchen showroom) in Chelsea and will allow customers to browse and purchase products / place orders at the Site.
- 7.63 The owner of the BDL has identified land within its own estate on which to temporarily relocate the existing 14 Blackburn Road business. The temporary relocation site is outside of the catchment of the current store so could not be a permanent relocation site, as there would likely be an almost entire loss of the store's goodwill. The business has guaranteed to staff that they will retain their jobs at the temporary relocation site, and when the business returns to 14 Blackburn Road. As most staff live locally in Camden, the business will make travel arrangements for staff to the temporary relocation site.
- 7.64 The proposed ground floor café at the base of the PBSA will provide a high-quality double height amenity space for student use, study and socialising. The café will also be publicly accessible which promotes a vibrant and inclusive atmosphere, connecting students with the broader community and establishing 14 Blackburn Road as a hub for social engagement (this will also assist in creating a mixed and inclusive neighbourhood in accordance with London Plan policy H15 and the PBSA LPG).
- 7.65 It is therefore considered that the principle of the proposed ground floor/lower ground floor commercial space including a café space and showrooms/retail with future flexibility for subdivision to smaller Use Class E/retail units is acceptable and supports the aims and objectives of the development plan and NPPF.

### **Affordable Housing**

- 7.66 London Plan Policy H4 states that the strategic target is 50 per cent of all new homes delivered across London to be genuinely affordable. For major developments which trigger affordable housing requirements, affordable housing must be provided through the threshold approach as per London Plan Policy H5 which requires a minimum of 35% per cent to be affordable.
- 7.67 CLP Policy H4 aims to maximise the supply of affordable housing. It states that an affordable housing target of 50% applies to developments with capacity for 25 or more additional dwellings. The supporting text to this policy confirms this primarily relates to



self-contained housing and HMO's. NP Policy 1 reflects the CLP's aims to achieve a 50% target of affordable homes.

- 7.68 The proposed development proposes 35 x C3 self-contained homes, all (100%) of which are to be affordable. As such, the above policy requirements are exceeded. Furthermore, when taken as a percentage of all residential accommodation (C3 self-contained units and student housing combined) this represents 37% affordable GIA, 43% affordable of the overall residential NIA and 41% of the overall habitable rooms. This exceeds the 35% fast-track threshold which applies and represents an increase on the 35% by habitable rooms secured under the approved O2 Masterplan outline scheme. This 'blended approach' where conventional C3 is provided as the affordable component has previously been supported by LBC and the GLA as confirmed through the recent decision ref: 2024/0479/P (100 Chalk Farm Road).
- 7.69 London Plan Policy H15 and CLP Policy H9 (Student Housing) has already been discussed above in relation to ASA provision. As previously confirmed, the Applicant is proposing to deliver the required affordable component of the PBSA via conventional C3 accommodation, offering 35 units. Notwithstanding criterion 4 of London Plan Policy H15 as set out above, CLP Policy H9 allows for student housing provision which does not secure affordable student accommodation (ASA) to deliver an appropriate amount of affordable housing for general needs. As such, the GLA confirmed support for this approach within the pre-application response ref: 2024/0341/P21.

### **Affordable Housing Tenure & Mix**

- 7.70 London Plan Policy H6 states that the following split of affordable products should be applied to residential development;
- 1) a minimum of 30% low-cost rented homes (London Affordable Rent or Social Rent) allocated according to need and for Londoners on low incomes
  - 2) a minimum of 30% intermediate products which meets the definition of genuinely affordable housing including London Living Rent and London Shared ownership
  - 3) the remaining 40% determined by the borough as low-cost rented homes or intermediate products based on identified need.
- 7.71 CLP Policy H4 states that the guideline mix of affordable housing types is 60% social-affordable rented housing and 40% intermediate housing. The supporting text does however state that the guidelines will be applied flexibly taking into account the criteria of the policy and that in certain circumstances the Council may support proposals which only provide social affordable rented housing or only provide intermediate housing. The CPG guidance on Housing states that affordable housing for rent should be let by a Registered Provider (RP) and that in order to best meet the needs of Camden residents and to ensure that the Council works with registered providers who share the Council's affordable housing priorities, the Council has an Approved Strategic Partner List. Furthermore, the Housing CPG states that the Council expects affordable housing and market housing to form integral parts of each development, and that the

development should be tenure blind, using a common design approach, with high quality materials and finishes throughout.

- 7.72 CLP Policy H6 seeks development to create mixed, inclusive and sustainable communities by seeking a variety of housing including a mix of housing sizes. It states that it will require a range of dwelling sizes in accordance with CLP Policy H7. CLP Policy H7 seeks to ensure that all housing development contributes to meeting the priorities set out in the dwelling size priorities table. NP Policy 1 seeks a range of different unit sizes, including family sized units where appropriate.

<b>Table 1: Dwelling Size Priorities</b>				
	<b>1-bedroom (or studio)</b>	<b>2-bedroom</b>	<b>3-bedroom</b>	<b>4-bedroom (or more)</b>
Social-affordable rented	lower	high	high	medium
Intermediate affordable	high	medium	lower	lower

*CLP Affordable Housing Size Priorities*

- 7.73 Additionally, the Housing CPG (2021) sets out further detail on the preferred mix for affordable housing. For social affordable, it sets an overall aim of 50% of units to have 3 bedrooms or more, and sets the following mix; 1 bedroom homes (no more than 15%), 2 bedroom homes (50%), and 3 bedroom homes (30% or 50%) if the Council's preferred percentage of 4 bedroom homes (20%) is not provided. For intermediate housing, the preferred mix is for a substantial proportion of all homes to be studio or 1-bedroom homes, and for 2 bedroom homes advises that a proportion of high quality of two bedroom/four person homes may be included where they are genuinely suitable for sharers, and available for letting on a shared basis to two jointly-eligible households as well as letting to families. For 3 bedrooms or more, the Council will only support provision of intermediate homes with three bedrooms or more where they are genuinely affordable to target income families and can be included without a reduction in the proportion of Social Rented homes.
- 7.74 It is noteworthy that the latest Housing Needs Assessment (2022) has informed the dwelling size priorities for the emerging plan which remains in line with the CLP and Housing CPG.
- 7.75 Throughout the design process the Applicant has engaged with numerous Camden approved affordable housing RP's (Sovereign Network, Origin/PfP and Notting Hill Genesis) to ensure the homes meet their requirements and represent the highest design quality. The proposed designs were well received by the RP's and comments were relatively minor. The key change that was delivered following the consultation was regarding tenure separation. This engagement is documented within the Affordable Housing Statement prepared by DS2 and submitted in support of this application.

- 7.76 Two options were presented during the design development to RP's on Camden's approved list. Option 1 delivered 21 (60%) Social Rented units and 14 (40%) Intermediate units in line with CLP Policy H4, although included Intermediate units dispersed amongst the Social Rented homes. Option 2 delivered 24 (69%) Social Rented units and 11 (31%) Intermediate units, although allowed the units to be configured and separated by core, with the tenures delivered in discrete sections, which allows a more efficient layout for better management of the different tenures. The clear preference from RP's was for Option 2, which would provide 69% Social Rented Housing, in excess of the 60% required by policy. Clarification was sought from LB Camden (however without a response) whether it would be acceptable to over provide Social Rented housing in the development. It should also be highlighted that during the consultation process conditional offers have been received from two RP's. Please see further information in the submitted Affordable Housing Statement by DS2.
- 7.77 The design is intended to deliver a range of unit sizes across the proposed development and the design mediates between the Local Plan and the need to deliver a high proportion of affordable housing. The proposed development delivers a range of different sized accommodation, from 1 bedroom to family sized units. The Low Cost Rented (Social Affordable Rented) accommodation will meet the needs of a range of households, including larger family households and the Intermediate Housing accommodation will meet the needs of a wide range of households, ranging from single and couple households in the one beds to smaller families or potentially sharers living in the 2 bed 4 person units. Furthermore, the applicant has worked with potential RP's to ensure that the Proposed Development delivers high quality affordable housing that will meet the needs of residents and management teams. Please refer to the Affordable Housing Statement prepared by DS2.
- 7.78 As such, the proposed development would deliver 8 x 1-bed units, 15 x 2-bed units and 12 x 3-bed units across both tenures. See further details in the table below.

<b>Affordable Tenure</b>	1B2P	2B3P	2B3PW	2B4P	2B4PW	3B5P	3B6P	Total
Social	0	0	4	8	0	6	6	24 (69%)
Intermediate	8	0	0	3	0	0	0	11 (31%)
	8	0	4	11	0	6	6	35

- 7.79 This results in 24 social rent units (69% by unit / 79% by habitable room) and 11 Intermediate housing units (31% by unit / 21% by habitable room) and in terms of dwelling size across each tenure, this equates to:
- Social – 17% 2B3PW, 33% 2B4P, 25% 3B5P and 25% 3B6P
  - Intermediate – 73% 1B2P and 27% 2B4P
  - X4 M3(3) units (11%) (accessibility covered in more detail later in this Planning Assessment)

- 7.80 The proposed development would therefore broadly align with CLP Policies H4, H6 and H7 and the Housing CPG in terms of achieving an appropriate housing mix in terms of tenure and dwelling size, which also aligns with the corresponding policies and dwelling size priorities set out within the emerging plan. For the avoidance of doubt, accessibility is assessed later in this Planning Assessment.

## **Housing Quality**

### C3 Residential

- 7.81 London Plan Policy D6 sets out the Mayor's requirements for housing quality and standards. This includes meeting the Nationally Described Space Standards, which set out minimum floor areas, requirements for outdoor amenity space for new dwellings as well as maximising the number of dual-aspect units. It includes specific requirements regarding the size of private amenity spaces and internal residential layouts.
- 7.82 CLP Policy H6 states that the Council will seek to secure high quality accessible homes, encouraging design of all housing to provide functional, adaptable and accessible spaces and to meet the Nationally Described Space Standards.
- 7.83 The proposed residential units are of a high-quality design and meet the required internal space and room size standards set out in the London Plan and CLP. The layout of each unit has been designed with well-lit and spacious living spaces, with the deck access design allowing dual aspect accommodation to all units.
- 7.84 The relationship to surrounding built development has been carefully considered in the context of distances to neighbouring properties and the siting, layout and location of windows ensures that the outlook from and daylight/sunlight to habitable rooms are acceptable.
- 7.85 The supporting Daylight and Sunlight Report confirms that internal daylight to the proposed development will comply fully with the aspirations of the BRE Guide to all habitable rooms except those located beneath north facing external walkways (the deck access) to the C3 component. Of the rooms experiencing shortfalls, these can be supported against the aspirations of the BRE Guide as these are set for suburban rather than urban contexts. In terms of internal sunlight to the proposed development, all windows will receive adequate sunlight and will fully comply with the strict aspirations of the BRE Guide for suburban contexts.
- 7.86 With regard to private amenity spaces, it should be highlighted that the London Plan SPG 'Housing' states (paragraph 2.3.32) in exceptional circumstances, where site constraints make it impossible to provide private open space for all dwellings, a proportion of dwellings may instead be provided with additional internal living space equivalent to the area of the private open space requirement. During pre-application discussions, given the concerns raised by TfL to open balconies on the southern

elevation facing the railway and that LBC considered that balconies would disrupt the design of this elevation, LBC considered that the internalisation of his space would improve the design of the scheme and be of greater benefit to future residents. For these reasons, and as set out on page 65 of the DAS, unit sizes are oversized to include the amenity area internally; on the southern elevation a series of bay windows are proposed which include the internal amenity space, providing a sunny aspect and expansive views southwards. This additional space is provided within generous living rooms, creating useable space all year round, behind the external fabric of the building, and mitigating noise from the railway.

- 7.87 The residents of the units will however have access to a communal roof terrace of 149 sqm at level 06. The amenity roof terrace will be designed as a multifunctional space for residents including seating, children's play space, amenity lawns and landscaping.
- 7.88 The proposed development has undergone extensive design evolution in response to pre-application feedback to ensure the delivery of new affordable homes of a very high quality design. In addition, the design has been further refined and enhanced through engagement with Camden's Design Review Panel. In summary, the proposal provides a high standard quality of residential accommodation and is therefore in accordance with guidance and standards set out in the development plan and national planning policy guidance. For further details, please refer to the DAS which sets out in detail the high quality design standards of the proposed development.

#### PBSA

- 7.89 The London Plan Guidance PBSA (2024) sets out general guidance requirements for student accommodation, and whilst there is no specific guidance on amenity spaces for PBSA, it recognises a need for developments to achieve a good mix of internal and external amenity spaces.
- 7.90 The proposed development will deliver 192 1-bed studios, including 24 (12%) of the units to be wheelchair accessible studios. The proposal offers a suitable variety of living options and layouts at differing price points to meet the needs of all prospective students, whilst the provision of a high quality amenity offer will ensure a high standard of living conditions for occupants. The proposed units offer a mix of unit sizes ranging from 17-23 sqm, whilst rooms capable of being occupied by wheelchair users range from 24-27 sqm.
- 7.91 Additionally, the scheme provides 145 sqm internal amenity space at ground floor (including the café) and 160 sqm at mezzanine level giving 305 sqm total internal amenity space. At level 01, an external amenity space (145 sqm) is provided for the students comprising of a mix of seating areas, lawned amenity spaces and landscaping. Overall, the proposed development provides for 1.6 sqm of shared internal amenity and 0.8m per sqm shared external amenity per student room, providing high quality of internal and external amenity spaces of 2.4 sqm per student for the student component, which is well in excess of best practice examples (where over 1.7sqm is generally considered sufficient).

- 7.92 The proposed development would therefore comply with London Plan Policy H15 and CLP Policy in delivering a high-quality standard of PBSA.

### **Design & Comprehensive Development**

- 7.93 Section 12 of the NPPF set out the opportunities for new development to achieve well-designed places and emphasises that this is fundamental to what the planning and development process should achieve.
- 7.94 Within Section 12, Paragraph 126 states that the creation of ‘high quality, beautiful and sustainable buildings and places’ constitutes ‘good design’ and is a key aspect of sustainable development, which helps to create better places in which to live and work.
- 7.95 London Plan Policy GG1 Building Strong and Inclusive Communities seeks to ensure that new buildings and the spaces they create are designed to reinforce or enhance the identity, legibility, permeability and inclusivity of neighbourhoods, and are resilient and adaptable to changing community requirements.
- 7.96 London Plan Policies D1, D2 and D3 seek to ensure that new developments are well-designed and fit into the local character of an area, and that development must make the best use of land by following a design-led approach that optimises the capacity of sites. New buildings and spaces should respond to the form, style and appearance of an area to successfully integrate into the local character of an area, with a positive relationship with the natural environment and respect and enhancement of the historic environment.
- 7.97 London Plan Policy D4 sets out that development proposals referable to the Mayor must have undergone at least one design review early on in their preparation before a planning application is made or demonstrate that they have undergone a local borough process of design scrutiny.
- 7.98 CLP Policy D1 requires development to be of the highest architectural and urban design quality and have particular regard to design and visual impact and to the context within which it is placed, and the contribution it makes to the landscape qualities of the area. NP Policy reflects these aims, seeking development to be of a high quality of design which complements and enhances local character.

### **Layout**

- 7.99 The approach to site layout centres around making the most of the opportunities presented by this Site, seeking to make an efficient use of previously developed land and to create active frontages along this part of Blackburn Road. Given the existing footprint of buildings on Site, which are sited adjacent to the footpath along Blackburn Road, and street frontage development along the opposite side of Blackburn Road, the proposed development has been designed to address the street scene, with an outward looking design which provides a strong building frontage to Blackburn Road.

The proposed layout therefore reflects the pattern of surrounding development which is predominantly characterised by street frontage development. By virtue of the proposed commercial shopfronts at ground floor/street level and clearly defined entrances for the C3 residential and PBSA/Café uses along Blackburn Road, the proposed building will offer a substantially improved active frontage along street level. The southern elevation has also been carefully designed to provide visual interest from the railway corridor, and from buildings on the southern side of the railway tracks.

- 7.100 Account has been taken of the approved parameter plans for the O2 Masterplan permission, with the development aligning with the maximum building footprint for Plot S8, including maintaining a 3m no structure buffer zone to the south of the Site between the proposed building and the boundary with the rail line. In addition, where the parameter plans approved a building footprint which retained a minimum pavement width of 2.4m between the building and Blackburn Road, the proposed building layout has been designed to increase the pavement width. The proposed development provides additional clearance at the Blackburn Road frontage of the Site to facilitate delivery of generously dimensioned high-quality pedestrian amenity. By pulling back the building line at ground floor level, the proposed development achieves a pavement width of 4.1m at its largest points, 2.4m at its smallest pinch points and 3.5m width across the majority of the pavement.

#### Height, scale and massing

- 7.101 The proposed development comprises of two distinct buildings that are linked at ground level. The C3 building will be 4-7 storeys including a taller ground floor and the PBSA building will be 10 storeys including a ground floor and amenity mezzanine level.
- 7.102 The massing of the building has been designed to step in height from the taller heights of the consented O2 Masterplan development (between 10 to 15 storeys) towards the lower-level buildings which are closer to West End Lane (between single to 3 storeys). The proposed massing has also been designed to be in keeping with the emerging context of development along Blackburn Road, including the existing buildings and consented development schemes, where the building massing ranges from between 3-4 storeys up to 9 storeys as buildings extend away from West End Lane. Having regard to the emerging context around West End Lane and Blackburn Road which includes many tall consented schemes (varying between 4-15 storeys) the proposed development will be between 4 to 10 storeys which will sit comfortably within the overall context of massing of neighbouring development. For further details regarding the proposed massing strategy and its evolution please refer to the submitted DAS (pages 16, 37, 43-45). The emerging context diagram can also be seen at paragraph 2.13 of this Statement).
- 7.103 The Site benefits from outline consent for a building up to 7 storeys/75.7 AOD. Whilst the proposed development seeks to increase the consented heights to 10 storeys, pre-application advice from the GLA was supportive of this increase where it was confirmed that *'given this modest uplift, alongside the emerging context, a tall building at this site would be acceptable in principle'*. The pre-application advice from both LBC and the

DRP were also comfortable with the proposed increase in scale and massing above the outline consent for 14 Blackburn Road.

- 7.104 Acknowledging that tall buildings are proposed as part of the O2 Masterplan, feedback from the DRP was supportive of an increase in scale and massing to the originally presented scheme proposed at between 6 storeys (C3) to 8 storeys (PBSA) and as a single building), however, subject to the building being separated into two components.
- 7.105 As a result, the building heights were increased to the currently proposed scale and massing but with a break in the massing, dividing the scheme into two distinct parts (C3 and PBSA), expressing the development into two different tenures. The break in the massing further mirrors the building masses indicatively proposed for outline Plot S8 of the O2 Masterplan where the development was designed with a break between two buildings.
- 7.106 For these reasons the proposed height, scale and massing is considered to respond positively to its surrounding townscape and neighbouring development, whilst making an effective use of the Site.

#### Design and materiality

- 7.107 The proposed design and detailing has been based on two architectural typologies identified in the immediate context of the Site. This includes the Victorian and Edwardian shopfronts along West End Lane which are composed around a vertical rhythm of smaller elements, each framing individual homes above, and retail units below. The roofscape includes pitched roofs and arches to divide the continuous building height. The other typology is based on the buildings facing the railway line, which adopt a predominantly brick based architecture incorporating sub-divided Crittall style windows. The fenestration is evenly spaced and many units occupy the arches underneath railway lines making use of the repeated arches to create shopfronts.
- 7.108 The proposed building is divided into two halves expressing the two different tenures. The C3 half is separated into smaller vertical components, each framing the width of a home behind, continuing the grain of the adjacent West End Lane. Each component shares a common language of GRC shopfronts on the base and pitched parapets on the roof. The PBSA element is larger in scale and has been designed to have a more uniform expression. The PBSA component includes repeated arches on the ground floor reflecting the neighbouring railway arches. These frame the café space on the corner and host large glazed elements to provide active frontage onto Blackburn Road. Crittall windows are proposed to upper floors whilst larger pitched parapets are proposed above the PBSA component.
- 7.109 The proposal adopts a predominantly red/orange brick-based materiality, taking influence from the neighbouring Victorian and Edwardian architecture. Both the C3 and PBSA components share a material palette utilising the colours and finishes in different ways to accentuate the difference between the two building typology influences. The C3 element sits on a GRC base to delineate the shopfronts, whilst the PBSA element



accentuates the ground floor with brickwork arches and darker columns. Materials have been carefully selected to pick up on the character of neighbouring buildings and the proposed use of high-quality materials will ensure that a suitably high standard of finish is achieved.

- 7.110 Repeated shop fronts form the majority of the street level on the north elevation, with larger areas of glazing to allow pedestrians to look into the ground floor commercial space. In addition to the shop fronts, the Blackburn Road frontage includes the C3 entrance and PBSA entrance, the latter of which is connected to the cafe space. The proposed service yard entrance has also been designed with contemporary laser cut metal fretwork to create a visually engaging entrance. To the east elevation of the building, further activated frontage is provided by an additional entrance to the café space which opens out onto a public square. To the west elevation, the proposal has also been designed to adapt to several scenarios including one where a building entrance has been designed to facilitate a connection to a public square (potentially envisaged as part of TfL station works). Should the opportunity present itself, a connection to the TfL square can be facilitated by raising the internal floor height to be level with the square which could provide for a different function (such as a café space) to front onto the TfL square (please refer to the design options on pages 83-91 of the DAS).
- 7.111 The proposed development therefore provides active frontage, significantly improving upon the poor relationship of the existing buildings on Site to Blackburn Road. Additionally, in comparison with the O2 Masterplan Plot S8, the percentage of the active street frontage (with the scenario connecting through to the TfL station) has increased from 112m (73%) to 122m (78%) active street frontage. In the scenario without connecting through to the TfL station, the percentage of active street frontage has increased from 115m (77%) to 122m (78%).
- 7.112 The proposed development adopts a brick-based materiality in line with the heritage context alongside the proposals for the remainder of the consented O2 masterplan and the Clockwork Factory – 13 Blackburn Road. A range of brick detailing and coursing has been used reflective of the richness of the neighbouring development. Patterned, metal rainscreen panelling has also been featured on Haywood House across the road. This is reflected in the metal cladding used within the proposals ground floor arches and in the connecting building between the C3 and PBSA elements, as well as the perforated panels above the windows.
- 7.113 In summary, the proposed development is considered to sympathetically adjoin neighbouring development and would provide for an elegant, contemporary building that both respects and responds to its context. The proposed development is therefore considered to accord with the principles of the development plan and national planning policy in this regard. For full details of the scale, massing, design and materiality of the proposed development please refer to the supporting DAS.
- 7.114 As set out above, the proposals have undergone a rigorous process of design review prior to submission, including with ongoing input from the LBC, Design Review Panel,

and GLA. The resultant proposals are considered to be of an exemplary architectural quality that are both functional and ensure a high-quality living environment, in accordance with London Plan Policies D1, D2, D3 and D4 and CLP Policy D1.

## **Accessibility**

- 7.115 London Plan Policy D5 states that new development should take account of London's diverse population and be convenient and welcoming, with no accessible barriers. London Plan Policy D7 and CLP Policy H6 requires developments to provide at least 10% of dwellings to meet Building Regulation requirement M4(3) 'wheelchair user dwellings and all other dwellings to meet Building Regulation requirements M4(2) 'accessible and adaptable dwellings'.
- 7.116 The proposed development has been designed in accordance with the principles of inclusive design key access principles being inclusive, secure and providing step free access with accessible routes to all public areas and the avoidance of barriers to anyone with disabilities or impaired mobility. In accordance with the above policies, the proposed development has been designed to deliver 11% of C3 affordable homes as wheelchair accessible and adaptable to comply with the Building Regulations Part M4(3), with all other homes delivered to the M4(2) standard. Furthermore, exceeding the requirements of PBSA LPG guidance, 12.5% of student rooms will be capable of being occupied by wheelchair users. This is split into 10 (5.2%) accessible rooms and a further 14 (7.5%) easily adaptable rooms. For further details please refer to the accessibility section contained within the DAS.

## **Tall Buildings**

- 7.117 London Plan Policy D9 Part B states that Tall Buildings should only be developed in locations that are identified as suitable in Development Plans, and Part C states that development proposals for tall buildings should address the following impacts:
- 1) Visual impacts
  - 2) Functional impact
  - 3) Environmental impact
  - 4) Cumulative impacts
- 7.118 CLP Policy D1 specifies the assessment of tall buildings within the borough. It states that the assessment will give particular attention to how the building relates to its surroundings, the historic context of the building's surroundings, the relationship between the building and views, the degree to which the building overshadows public spaces and the contribution the building makes to pedestrian permeability and improved public accessibility.

### Principle of a tall building

- 7.119 The scheme includes buildings over 30 metres high and the proposal is between four and ten storeys. The proposed development therefore represents a tall building as defined by London Plan Policy D9A.
- 7.120 The Site is located in a growth area (West Hampstead), identified in the development plan, and is capable of delivering a significant amount of development. This means there will be an increase in density and scale above the existing, as anticipated in the development plan, in order to optimise the use of the Site and deliver best use of this previously developed site. Additionally, the Site forms part of the O2 Masterplan permission which granted permission for the development of tall buildings (buildings up to 60m in height and up to 15 storeys). With regard to outline Plot S8 (14 Blackburn Road), the Site already benefits from outline consent for a building up to 7 storeys/75.7 AOD on this Site and therefore the principle of a tall building has already been established at the Site.
- 7.121 As outlined previously within this statement, whilst the proposed development seeks to increase the consented heights from 7 to 10 storeys, pre-application advice from the GLA confirmed that *'a tall building at this site would be acceptable in principle'*. Furthermore, pre-application advice from LBC and the DRP were comfortable with the proposed increase in scale and massing above the outline consent for 14 Blackburn Road.
- 7.122 Finally, it should also be acknowledged that the emerging site allocation W2 (WHI2) – O2 Centre, car park, car showrooms and 14 Blackburn Road (Draft New Camden Local Plan) acknowledges that the Camden Building Heights Study has identified this Site as a location where tall buildings may be an appropriate form of development, with 9m - 54m considered the potentially appropriate height range, which translates to between 3-16 storeys.
- 7.123 For the above reasons, it is considered that the principle of a tall building in this location is supported in both policy terms and having regard to the emerging context of the Site. The impacts are set out in the supporting reports submitted with the application including the DAS, Townscape and Visual Impact Assessment (TVIA), as well as other supporting technical documents and are summarised as follows:

### Visual impacts:

- 7.124 London Plan Policy D9 Part C (1) requires visual impacts to be considered including views, spatial hierarchy of the surrounding context, legibility and wayfinding, architectural quality, heritage assets and glare.
- 7.125 The TVIA assesses the potential effects of the proposed development having regard to its townscape, visual and heritage impacts. In summary, the TVIA concludes that the proposals are considered to integrate well within the contextual townscapes, with the scale and massing reacting accordingly to existing and emerging townscape, and

so is the proposed materiality, which reflects the distinctive colours and finishes of the existing architecture. The proposals will redevelop the Site in a positive manner and will form part of an important gateway to the O2 Masterplan.

- 7.126 For these reasons, and as demonstrated in the supporting TVIA, the proposed development would have an acceptable resulting visual impacts and complies Policy D9 Part C (1). Please refer to the TVIA and 'Townscape, Heritage & Views' section of this statement for further details.

Functional impacts:

- 7.127 Policy D9 Part C (2) requires that development proposals address internal and external design, including construction, servicing, maintenance, emergency routes and management.
- 7.128 The internal and external design ensures the safety of all occupants, and the servicing, maintenance and management arrangements have been carefully considered as part of the development proposals. The application has been submitted with technical reports setting out how transport, delivery, servicing, construction management and logistics, security and fire safety of the proposed development have been considered, and which demonstrate acceptable resulting impacts. Summaries of these reports are provided in detail throughout this statement. A Student Management Plan has been submitted with the application which demonstrate how the PBSA component will deliver safe and clean accommodation for students and to ensure that the proposed future occupation would not have a detrimental impact on neighbouring amenity or the area in general. Furthermore, the applicant's delivery partner, Fifth State, has extensive experience with developing mixed-use developments of this scale. Policy D9 Part C (2) is therefore considered to be complied with.

Environmental impact:

- 7.129 Policy D9 Part C (3) requires that development considers the microclimatic impacts of tall buildings including wind, daylight, and sunlight penetration around the building and neighbourhood.
- 7.130 The Wind Assessment concludes that wind conditions at and around the proposed development would be suitable for the intended uses and the off-Site areas would have wind conditions that are materially the same as those as the existing Site with existing surrounding buildings. Please refer to the Wind Microclimate section of this statement for full details.
- 7.131 The Daylight/and Sunlight Assessment demonstrates that the resulting daylight, sunlight and overshadowing impacts are acceptable. In areas where compliance with the aspirations of the BRE Guide is more challenging, any derogations would be justified, particularly given the under-developed nature of the existing baseline condition of the Site, the location of the Site within the West Hampstead Interchange Area - which seeks better use of sites and, necessarily, greater density and having regard to the comparable daylight and sunlight impacts as the O2 Masterplan Plot S8.

The proposed development is therefore considered to have acceptable daylight, sunlight and overshadowing impacts.

- 7.132 As a result, the scale and location of the buildings will not give rise to any unacceptable impacts. As confirmed in the EIA screening assessment, it is considered that the proposed development is unlikely to have significant environmental effects that necessitate an Environmental Impact Assessment. Policy D9 Part C (3) is therefore considered to be complied with.

Cumulative impacts:

- 7.133 Policy D9 Part C (4) requires consideration of visual, functional and environmental impacts of proposed, consented and planned tall buildings. In this instance, the context for the Proposed Development is evolving with recent built and granted permissions along Blackburn Road along with the recently granted O2 Masterplan permission which has accepted the principle of tall buildings as part of a growth area targeted for significant development. All of these schemes have been taken into account as part of relevant consultant's assessments as outlined within this Statement.
- 7.134 In summary, a tall building in this location is considered to be acceptable in principle in line with the emerging context of West Hampstead as a growth area and the consented O2 Masterplan permission. The height of the Proposed Development has been carefully considered and moderated through an extensive design-led engagement process, and through numerous productive pre-application meetings with LBC Officers, the DRP and other stakeholders. This has resulted in an optimised composition of tall buildings of the highest design and architectural quality. Policy D9 Part C (4) is therefore considered to be complied with.

## **Fire Safety**

- 7.135 The accompanying Fire Statement (and statutory Gateway One), prepared by Orion Fire Engineering, details the fire safety strategy for the Proposed Development and demonstrates compliance with the relevant Building Regulations and London Plan Policies D5 (Inclusive Design) and D12 (Fire Safety.) Orion Fire Engineering are a specialist fire safety consultant and have been involved in the design process since the early stages of design development.
- 7.136 In summary, the fire strategy has been developed to provide sufficient information to meet the core objectives and criteria of the RIBA Plan of Work for RIBA Stage 2. The RIBA 2 fire strategy addresses the architectural concept of the building to ensure that the proposed development complies with London Plan Policies D12 and D5 and relevant Building Regulations. Attention has been paid to key fire safety items that could affect the architectural concept, M&E/structural engineering strategy or the land use and planning considerations of the development.

## Townscape, Heritage & Views

- 7.137 The Planning (Listed Buildings and Conservation Areas) Act 1990 (“the Act”) is the legislative basis for decision making when determining planning applications that relate to the historic environment.
- 7.138 Section 72 of the Act imposes a duty on local planning authorities when considering applications which affect buildings in conservation areas to pay “special attention” to the desirability of preserving or enhancing the character or appearance of the conservation area.
- 7.139 Section 66 of the Planning (Listed buildings and Conservation Areas) Act 1990 (as amended) sets out that special regard must be given to the preservation of a listed building, its setting or features of special architectural or historic interest.
- 7.140 The legal tests in the Act are supplemented by the policy guidance in Chapter 16 of the NPPF. When considering the impact of a Proposed Development on the significance of a designated heritage asset, paragraph 212 states that:
- “...great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be.) This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.”*
- 7.141 In relation to the consideration of impacts on non-designated heritage assets, paragraph 216 states: *“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”.*
- 7.142 Paragraph 219 of the NPPF states: “Local planning authorities should look for opportunities for new development within Conservation Areas ... and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.”
- 7.143 The above provisions are echoed within London Plan Policy HC1, CLP Policy D2 and NP Policy 3.
- 7.144 The application is submitted with a Townscape and Visual Impact Assessment (TVIA) which assesses the potential effects of the proposed development having regard to its townscape, visual and heritage impacts. It considers the townscape and visual effects arising from the proposed development having regard to the Site’s existing surroundings as well as the cumulative impacts with the consented O2 Masterplan and emerging context of consented developments. The following provides a summary of the TVIA.

#### Townscape Assessment:

- 7.145 In order to assess the townscape effects of the proposed development, the TVIA considers built form within a 500m radius of the Site and assesses the potential impact on four surrounding Townscape Character Areas (TCA's) – TCA1: Finchley Road, TCA2: West Hampstead/North Kilburn, TCA3: West Hampstead/Fortune Green and TCA4: Kilburn. The TCA's are based on the TCA's identified in the LBC Camden Character Study 2015.
- 7.146 The TVIA concludes that the scheme will create change within TCA's 1 (Finchley Road) and 2 (West Hampstead/North Kilburn), introducing a new feature and focal point into the townscape. However, in close views within TCA1 and from the western edge of TCA2 this will be beneficial, introducing a new high quality and contextual element into the streetscene. The low-grade buildings on Site will be replaced and the development will form a new defined built edge to Blackburn Road, as well as a new sense of enclosure to the townscape. The proposals will also affect TCA1 in views from rising ground to the NE where it would be visible in the background of views across the open space of Hampstead Cricket Ground. However, there would be no dominating effect upon the open space due to the distances involved and the scale, massing, materiality and detailed design of the proposals.
- 7.147 In summary, with regard to TCA1, the TVIA concludes that the Proposed Development would have demonstrable townscape benefits in views on and around Blackburn Road, and will have a neutral effect in wider and long range views from rising ground to the NE. The impacts on TCA2 are considered to have a positive impact upon the character zone and views looking out from it.
- 7.148 The proposals will have no impact on TCA 3(West Hampstead/Fortune Green) and TCA4 (Kilburn) due to their position in relation to the Site, road alignment, topography and position of intervening buildings.
- 7.149 With regard to cumulative impacts, the proposed development will form part of the emerging taller and denser townscape on and around Blackburn Road, and looking east along Blackburn Road would include blocks N4 and N5 of the O2 Masterplan, as well as the curving block of S1 in the far distance. Together these will provide definition and enclosure to Blackburn Road and a high quality built edge to the north of the Underground railway lines. When viewed from the NE, the proposed development would be visible in the background of the larger blocks on the O2 Masterplan, forming a recessive and minor feature and blending with the newly created skyline. The cumulative impacts on TCA1 and TCA2 would therefore be acceptable. There would be no cumulative impact on TCA3 and TCA4.

#### Visual Assessment:

- 7.150 The visual assessment undertaken in the TVIA analyses the impact of the proposed development on nine different viewpoints which have been selected in Consultation with LBC, along with an additional viewpoint 10, taken from the London View Management Framework View (LVMF) (LVMF 5A.2 Greenwich Park: the General

Wolfe Statue – north east of the statue). This visual assessment undertaken considers the proposed development along with the cumulative impact, taking into account other schemes - including the O2 Masterplan, which have planning permission but are not yet built.

- 7.151 From viewpoints 01,02 and 06 there will be a demonstrable change to the townscape, however this will be beneficial. The replacement of existing buildings with new development that responds to the scale, grain and character of the surrounding townscape, improving visual amenity along Blackburn Road. In views 04 and 05 the proposal will form a recognisable element with the townscape. In views 08 and 09 the proposal will feature in the distant background and will avoid intrusion on the setting of open space or built form. From the remainder of the viewpoints, there will be no visual impact from the scheme, including viewpoint 10 where the proposed development will be entirely concealed from view from the protected vista between Greenwich and St Pauls Cathedral.
- 7.152 Similarly, when considering the cumulative impact of the scheme alongside existing consents and the O2 Masterplan, the proposed development will not result in anything above a moderate, neutral impact.

#### Heritage Assessment:

- 7.153 The Site is not located within a Conservation Area and does not include any Listed Buildings, however the TVIA considers the impact on nearby Listed Buildings, Conservation Areas, and Locally Listed Buildings (those within a 500m study zone around the Site) which are listed below:
- Lilian Baylis House (Grade II)
  - Hampstead Synagogue (Grade II\*)
  - Church of St James (Grade II)
  - South Hampstead Conservation Area
  - Fitzjohns/Netherall Conservation Area
  - West End Green Conservation Area
  - 202-220 Iverson Road (Locally Listed)
- 7.154 The TVIA confirms that there will be no adverse impact upon the setting of statutorily or locally listed buildings situated within the 500m study zone. Due to the distance between sites, road alignment, orientation, and intervening built form, the proposals will not be visible within the setting of any of the identified buildings, preserving existing views of them within the townscape.
- 7.155 The development would be visible from the northern fringe of the South Hampstead Conservation Area, and visible above the Victorian residential buildings on the north side of Broadhurst Gardens and in some longer views along Priory Road. However, due to the position of the railway lines to the north of Broadhurst Gardens, the development will appear recessive and set back from the existing houses. The proposed development has a carefully conceived form, profile and design, and a generous gap between the eastern and western elements, which ensures that it does



not appear monolithic or overly dominant. The proposal would therefore have no harm to the heritage significance of the South Hampstead Conservation Area, with its coherent architectural character, built form, layout and ambience maintained.

- 7.156 There will be no harm to the West End Green or Fitzjohn/Netherhall Conservation Areas, or upon their heritage significances as well preserved late Victorian and Edwardian residential suburbs. Whilst long range views of the Site might be possible, any impact would be negligible.
- 7.157 Overall, the proposals are considered to integrate well within the contextual townscapes, with the scale and massing reacting accordingly to existing and emerging townscape, and so is the proposed materiality, which reflects the distinctive colours and finishes of the existing architecture. The proposals will redevelop the Site in a positive manner and will form part of an important gateway to the O2 Masterplan. For these reasons, and as demonstrated in the supporting TVIA the proposed development would have an acceptable resulting townscape, visual and heritage impact and complies with the NPPF, London Plan Policy HC1, CLP Policy D2 and NP Policy 3.

### **Open Space, Trees & Landscaping**

- 7.158 Paragraph 103 of the NPPF states that access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities and can deliver wider benefits for nature and support efforts to address climate change.
- 7.159 Paragraph 136 states that trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. It further states that planning policies and decisions should ensure that new streets are tree-lined.
- 7.160 London Plan Policy D8 (Public realm) states that development plans and proposals should ensure that 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.
- 7.161 Policy D8 goes on to state that development plans and proposals should be based on an understanding of how the public realm in an area functions and creates a sense of place during different times of the day and night, days of the week and times of the year (Part D.) Further, to ensure both the movement function of the public realm and its function as a place are provided for and that the balance of space and time given to each reflects the individual characteristics of the area (Part E), and that there must be a mutually supportive relationship between the space, surrounding buildings and their uses, so that the public realm enhances the amenity and function of buildings and the design of buildings contributes to a vibrant public realm (Part F) The policy also

sets out the need to consider microclimate and surveillance (Part G), as well as biodiversity (Part I) and seating (Part J) in the design of public realm.

- 7.162 London Plan Policy G4 (Open space) states that development proposals should, where possible, create areas of publicly accessible open space, particularly in areas of deficiency.
- 7.163 London Plan Policy G7 seeks development proposals to ensure that, wherever possible, existing trees of value are retained. It states that if planning permission is to be granted that necessitates the removal of trees there should be adequate replacement based in the existing value of the benefits of the trees removed. The planting of additional trees should generally be included in new developments. CLP Policy A3 states that the Council will resist the loss of trees and vegetation of significant amenity, historic, cultural or ecological value, and requires trees and vegetation which are to be retained to be satisfactorily protected during the demolition and construction phase of development. It further requires developments to incorporate additional trees and vegetation wherever possible. This is echoed in the guidance contained in the Trees CPG.
- 7.164 CLP Policy A3 states that the Council will resist the loss of trees and vegetation of significant amenity, historic, cultural or ecological value, and requires trees and vegetation which are to be retained to be satisfactorily protected during the demolition and construction phase of development. It further requires developments to incorporate additional trees and vegetation wherever possible. This is echoed in NP Policy 18 and the guidance contained in the Trees CPG.
- 7.165 CLP Policy A2 confirms that the Council will protect, enhance and improve access to Camden's parks, open spaces and other green infrastructure. To secure new and enhanced open space, and ensure that development does not put unacceptable pressure on the Borough's network of open spaces, the Council will (amongst other provisions):
- seek developer contributions for open space enhancements using Section 106 agreements and the Community Infrastructure Levy (CIL), taking into account the scale of the proposal, the number of future occupants and the land uses involved;
  - apply 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;
  - 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;
  - ensure developments seek opportunities for providing private amenity space;

- 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;

- 7.166 NP Policy 9 seeks to encourage pedestrian access in the area and seeks to provide safe and wide pavements, giving maximum possible space to pedestrians, for developments to be set well back from the pavement, where appropriate, with the aim of giving additional pavement space. NP Policy 17 further seeks development to protect and improve existing green/open spaces and seeks the appropriate provision of new small green/open space as part of developments. Additionally, NP Policy 18 seeks to protect healthy trees that contribute to local character, ensure compensatory planting is provided where trees are to be cut down and promotes appropriate planting of additional trees.
- 7.167 SJ Stephens Associates have undertaken an Arboricultural Impact Assessment (AIA) of the Site, which outlines the likely direct and indirect arboricultural impacts of the proposed development along with suitable mitigation measures, as appropriate. The AIA identifies that the only trees or shrubs on the Site are some low quality Buddleia (identified as G1, T2 and T3) and Sycamore (T4) within the AIA which are proposed for removal. Given the low quality of these (Category C), no trees of any significance are proposed for removal so the arboricultural impact of these proposals on tree cover in the area will be minimal.. For full details please refer to the supporting AIA.
- 7.168 While the proposed development incorporates high-quality communal amenity spaces, the small scale of the Site and its layout provide a challenge for incorporating new public open space alongside the expected (under the O2 Masterplan), and proposed, wider regeneration benefits, including the amount of commercial and residential floorspace/units and the need to pull the building line back by 3m to create a high-quality pedestrian environment and contribute to the delivery of the 'east to west' route.
- 7.169 The public square to be delivered under the O2 Masterplan is to come forward immediately east of the Site. The proposed café space with an outdoor seating area has been designed to open up onto the new public square coming forward under the O2 Masterplan, so effectively enlarging the square, and the Applicant will contribute to the delivery of the public open space/public realm through a S106/S278 agreement. Under these circumstances, it is considered that a financial contribution in lieu of direct provision is justified and would contribute positively to the consented O2 Masterplan.
- 7.170 The proposed development includes public realm enhancement through activating the street frontage, the pulling back of the ground floor footprint to create provision of generously proportioned pedestrian amenity through widened pavements, as well as new trees, hedging and shrub planting on the two rooftop communal amenity spaces, which will be visible from the street scene. As well as a planter box with a tree located in the area adjacent to the proposed café.
- 7.171 The proposed development would therefore align London Plan Policies D8, G4 and G7, CLP Policies A3 and A2, the Trees CPG, NP Policies 9, 17 and 18 and the aims

and objectives of the NPPF in respect of trees, open space provision, public realm and landscaping.

### **Children's Play Space**

- 7.172 London Plan Policy S4 (Play and informal recreation), as supported by the Mayor's SPG on 'Play and Informal Recreation' states that residential development proposals for schemes that are likely to be used by children and young children should provide at least 10 sqm of play space per child in accordance with the Mayor's child yield estimator. Play space should provide a stimulating environment, be accessed safely from the street by children and young people independently, form an integral part of the surrounding neighbourhood, incorporate trees and/or other forms of greenery, be overlooked to enable passive surveillance and not be segregated by tenure. As set out in the SPG, play space is to be defined by age group, ranging from 0-17 years.
- 7.173 CLP Policy A2 confirms that in securing new and enhanced open space, the Council will 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.
- 7.174 Play space contributions are required for the proposed C3 units only. The GLA's Play Space Calculator confirms that 385.4sqm of play space should be provided in line with the Mayor's benchmark of 10sqm of dedicated play space per child.
- 7.175 However, the Open Space CPG recognises that while Mayor's 10sqm benchmark is supported, *'it would be difficult to meet this level of provision when it is higher than the 9sqm of public open space. Therefore, Camden will only seek to apply the Mayors standard in major schemes proposing an increase of 100 dwellings or more. As the 9sqm already includes an allowance for any play provision, Camden's will expect an additional 6.5sqm of play provision, rather than the 10sqm standard. This recognises that larger schemes are likely to require a full range of play equipment'*. In this connection, the GLA's Play Space Calculator confirms that 250.25sqm of dedicated play space would be required per child using Camden's benchmark of 6.5sqm per child.
- 7.176 In this connection, it should be noted that the C3 affordable homes have access to a roof terrace on level 06 at 149sqm. Play space for 0-4 year olds will be allocated on the C3 roof terrace and play space for older children will be satisfied with an off-Site contribution.
- 7.177 Play space will therefore be delivered, partly through on-Site provision comprising a total of 58sqm and partly through a financial contribution to secure off-Site delivery to meet the full requirement as calculated using the GLA's Play Space Calculator using Camden's benchmark of 6.5sqm per child. The proposal is therefore in accordance with London Plan Policy S4.

## Ecology & Biodiversity

- 7.178 London Plan Policy G6 states that *'Development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process'*. CLP Policy A3 states that the Council will protect and enhance sites of nature conservation and biodiversity, and will grant permission for development unless it would adversely affect the status or population of priority habitats and species. It further states that the Council will seek the protection of features with nature conservation value, seek biodiversity benefits and opportunities to experience nature, and for works to avoid disturbance to habitats and species.
- 7.179 In addition to the above policies, statutory requirements for Biodiversity Net Gain (BNG) have been introduced to ensure that at least a 10% gain in biodiversity value will be met in new developments.
- 7.180 The application has been submitted with a Preliminary Ecology Appraisal (PEA) which confirms that:
- No further ecology surveys are considered necessary;
  - Three statutory sites of nature conservation importance fall within the 2km of the Site, and that the Site falls within 5km Impact Risk Zone of West Hampstead Wood SSSI. However, the proposed development is not identified as a potential risk to these designated sites and these sites are therefore unlikely to be negatively impacted by the proposed works;
  - Eight non-statutory nature conservation sites fall within 1km of the Site, including West Hampstead Railsides SINC, approximately 50km west of the Site. However, if appropriate precautions are taken, these nature conservation sites are unlikely to be negatively impacted by the proposed works; and
  - No protected species or notable species will be negatively impacted if appropriate precautions are taken.
- 7.181 The PEA does identify that the proposed development of the Site has the potential to provide biodiversity enhancement through extensive green roof planting, proposed tree and shrub planting, and bird and bat boxes which have been recommended and incorporated into the scheme where possible or which can be controlled by a suitably worded planning condition.
- 7.182 The application is supported by a Biodiversity Net Gain (BNG) Assessment which concludes that the proposed development can achieve a positive habitat biodiversity unit change of 0.30 Units (1483.42%) based on the current creation proposals associated with a green roof area, introduced shrub and urban trees. Furthermore, it concludes that with regard to Hedgerow Units, a Net Gain of 0.01 Hedgerow Units is achieved through the creation of native hedgerows, however no baseline hedgerow

units are calculated due to the lack of hedgerows on Site, and therefore a percentage cannot be calculated. The proposed development would therefore comply with London Plan Policy G6, CLP Policy A3 and statutory BNG requirements under the Environment Act 2021.

### **Urban Greening Factor**

- 7.183 London Plan Policy G5 introduces the Urban Greening Factor (UGF), which quantifies the amount of greening delivered on development sites. It states that major developments of predominantly residential use should achieve an urban greening factor of 0.4 in line with the supporting calculator (Part B.) In this instance an UGF of 0.4 is achieved which meets the policy requirement. Please refer to page 138 which sets out the UGF calculations.

### **Transport & Highways**

- 7.184 NPPF Paragraph 109 states that transport issues should be considered from the earliest stages of development proposals, so that the potential impacts of development on transport networks can be addressed and the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains.
- 7.185 London Plan Policy GG1 states that in building strong and inclusive communities the movement of all Londoners, including older people, disabled people and people with young children should be supported by those involved in planning and development. London Plan Policy GG2 notes that in the creation of successful sustainable mixed-use places, development must prioritise sites which are well-connected by existing or planned public transport. London Plan Policies T1 and T2 further seeks development proposals to maximise all trips to be made by foot, cycle and public transport. It seeks new development to make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes.
- 7.186 CLP Policies T1 and T2 highlight the importance of prioritising walking and cycling as a sustainable mode of transport and indicate that car-free development across the borough is a key aim. This is also echoed in NP Policies 5, 7 and 8, and the Transport CPG.
- 7.187 The application has been submitted with a Transport Assessment, Travel Plan, Delivery and Servicing Plan and Outline Construction Logistics Plan which concludes that the development will have an acceptable impacts in respect of transport and highways matters. For full details please refer to the supporting documents, however, the following provides a summary of the main considerations.

### Parking and accessibility

- 7.188 The Site is within walking distance of West Hampstead stations, from which Thameslink, Overground and Jubilee London Underground services can be accessed. The Site is also within walking distance of Finchley Road, from which the Metropolitan Underground service can be accessed. Several bus stops are located within walking distance from the Site, which provide access to a range of services. The Site has a PTAL rating of between 6a and 6b, which is defined as 'excellent'.
- 7.189 The proposed development is therefore in an inherently sustainable location, and the development will promote and encourage walking, cycling and public transport use. Considering the excellent links to public transport, the development will be car free with no vehicular parking proposed but in seeking to improve on the parameters established as part of the consented O2 Masterplan, the development proposes on-Site servicing facilities to support the lower ground and ground floor flexible commercial/business space. The vehicular access for the on-Site servicing bay would be taken from Blackburn Road. Additionally, the scheme proposes an on-street loading bay on Blackburn Road at the western end of the Site (please refer to the delivery and servicing section below for further details).
- 7.190 Regarding disabled car parking, London Plan Policy T6.5 states that all non-residential elements should provide access to at least one on or off-street disabled persons parking bay. The Transport CPG states that for all major developments the Council will expect that disabled car parking is accommodated on-Site but that in any case the maximum distance Blue Badge holders should be expected to travel is 50 metres from the entrance to the Site. In this context, it is therefore considered appropriate for an off-Site contribution to be made for a disabled parking space to be provided on the public highway in a suitable location ideally within 50m from the Site, as agreed with Camden officers.
- 7.191 In support of the application an Active Travel Zone assessment has been undertaken as part of the Transport Assessment. This assessment concludes that the Site is suitably located to support an active travel lifestyle for future users and visitors of the Site. The proposed development can support the healthy streets credentials by enhancing the streetscape at the Site's frontages with the public highway. This will take the form of significant public realm improvements on the Blackburn Road frontage of the Site that can be secured through appropriate obligations to planning consent. With regard to the suitability of the proposed improved footway widths, a pedestrian comfort level assessment has been carried out to assess the suitability of the proposed improved footway widths at the front of the Site in accommodating baseline pedestrian movements, in addition to those generated by the fully developed O2 Masterplan and resulting pedestrian trips. This confirms that during the AM peak when the highest level of pedestrian activity is anticipated, the narrowest point (2.4m) of the proposed improved footway provides a high level of comfort for pedestrians.
- 7.192 Cycle parking is proposed to comply with the London Plan and CLP cycle parking standards. A total of 173 long-stay cycle parking spaces are proposed for the PBSA,

whilst a total of 80 long stay cycle parking spaces are proposed for the C3 residential use. The long-stay cycle parking for the student and residential aspects of the development are proposed to be located in the basement and will be accessible via the lifts within the respective aspects of the development. For the commercial floorspace, 6 long-stay cycle spaces are proposed and for the café/student amenity space, 2 cycle parking spaces are proposed. For the commercial space these are to be provided at ground floor in a secured area between the showroom and the service yard, whilst the spaces for the café are proposed within a secured area at ground level within the proposed café area.

- 7.193 A total of 38 short stay cycle spaces are proposed which are to be provided within the public realm in the east of the Site, from which all aspects of the development can be accessed on foot from the footways on Blackburn Road.
- 7.194 The proposed redevelopment provides additional clearance at the Blackburn Road frontage of the Site to facilitate delivery of generously dimensioned high-quality pedestrian amenity. The proposed landscaping treatment includes delivery of some public realm at the eastern end of the Site and considers on-street cycle facilities to align with the parameters established within the outline consent for the O2 Masterplan.

#### Traffic impact assessment

- 7.195 As outlined within the Transport Assessment, an assessment of multimodal travel to/from the proposed development has been carried out. Further to deriving estimates of travel to/from the Site for all proposed uses, an estimation of trips associated with the existing Site, the implemented use of the Site and the consented outline Plot S8 of the O2 Masterplan has been carried out to facilitate an assessment of the net change in trips resulting from the development of the proposed scheme at the Site. The assessment confirms that the proposed development would generate fewer vehicle trips compared to the existing Site operation, implemented 2004/2024 Permission scheme and Plot S8 of the O2 Masterplan. The trip generation exercise has also found that the net impact of proposed development trips when compared to the existing Site, the implemented 2004/2024 Permission scheme and the consented Plot S8 of the O2 Masterplan, on local public transport facilities is negligible when viewed against historic passenger volumes and current usage patterns.
- 7.196 In terms of the impact of vehicular traffic associated with the proposed development, the proposed development is car free, whereas the implemented 2004/2024 Permission scheme includes provision of some 14 parking spaces. Given the car-free nature of the development, vehicle trips will be limited to servicing vehicles only. An assessment of the servicing trip generation has found that the proposed development will result in a net decrease of some 89 vehicle trips across a typical day, when compared to the existing builders' merchant use of the Site. The estimated reduction in servicing trips accords with the difference in nature of the existing builders' merchant, where regular collections occur throughout the day, compared to that of the proposed commercial floorspace which generally generates fewer routine deliveries



and collections. The estimated decrease in vehicle movements is anticipated to support an improvement of the active travel environment along Blackburn Road.

- 7.197 A Travel Plan has been submitted with the application for the proposed development, setting out the management tools deemed necessary to enable residents, students, employees, and visitors to make more informed decisions about their travel, whilst minimising the adverse impacts of their travel on the environment.
- 7.198 The move-in / move-out strategy for students is also set out in detail within the accompanying Student Management Plan and the Transport Assessment. This provides suitable measures to accommodate servicing demand that is likely to increase when students move-in / move out of the premises on a bi-annual basis.

#### Delivery and servicing

- 7.199 The proposed servicing strategy is set out within the Delivery and Servicing Plan (DSP), prepared by RHDHV. However, the following sets out a summary of the proposed arrangements for deliveries and collections for the proposed development, this includes:
- PBSA, café and C3 residential use: Collection and deliveries to be carried out via the proposed on-street loading bay and existing kerbside areas (double yellow waiting restrictions) adjacent to the Site.
  - Commercial use: Collection and deliveries to be carried out via the proposed on-Site Service Yard. It is noteworthy that 13 and 15 Blackburn Road have service yards as well as the O2 Masterplan.
- 7.200 The DSP further sets out the waste storage arrangements for each use within the proposed development. The waste storage for the C3 residential component, PBSA and café would be located within their own dedicated storage areas with external access directly from Blackburn Road. Refuse collection will be carried out from Blackburn Road, where a refuse collection vehicle will park adjacent to the proposed bin store. With regard to the ground floor commercial use, waste would be stored in bins within the service yard, with collection from Blackburn Road.
- 7.201 The parameters established as part of the outline consent for the O2 Masterplan proposed kerbside (on-street) loading/unloading and waste collection for Plot S8 on Blackburn Road (the Site). In seeking to improve on the parameters established as part of the consented O2 Masterplan, the proposed scheme incorporates on-Site servicing facilities for the commercial use. The proposed on-Site servicing area incorporates two loading bays and provides sufficient clearance for an additional servicing vehicle to be able to wait within the Site, away from the public highway, as necessary, while affording suitable clearance for vehicles to egress the loading bay. In addition to the above, the scheme proposes provision of an on-street loading bay on Blackburn Road at the western end of the Site. For the avoidance of doubt, the proposed service yard is not for refuse vehicles.

- 7.202 In summary, the proposed delivery and servicing would not have an adverse impact on the highway network. For full details, please refer to the Transport Assessment and the DSP that support the application.

Construction management and logistics

- 7.203 A Construction Management Plan (CMP) and Outline Construction Logistics Plan (CLP) have been prepared to set out the management of all types of construction vehicle activity to and from the Site during the demolition and construction period.
- 7.204 The CMP has been prepared in accordance with relevant national and local planning policies and guidance and has been structured using Camden's Pro-Forma Construction Management Plan (v2.9).
- 7.205 The CMP sets out the early estimations of construction traffic movements and analysis of impact on the local highway network, details of the Site access and the measures that would be taken to mitigate the development during the demolition and construction of the proposed development. The CMP further sets out measures to ensure that should the construction of the proposed development overlap with the O2 Masterplan, that any construction working groups would be formed to include immediate neighbours in Blackburn Road as well as the contractors for the O2 Masterplan development. Please refer to the submitted CMP for full details.
- 7.206 It is acknowledged that a CMP is very much a working document which needs to be agreed, reviewed, and updated on a regular basis as the programme develops. Therefore, it is expected that this would be secured via condition or a s106 legal agreement.
- 7.207 Furthermore, the Outline CLP sets out the overall objectives to reduce environmental impact of construction activities through lower vehicle emissions and noise levels; risks to road users, specifically concerning construction vehicle movements to and from the Site; congestion by reducing the number of vehicle trips, particularly in peak periods; and cost through efficient working practices and reduced deliveries. Subject to the receipt of planning consent, and the appointment of a building and demolition contractor, a detailed CLP will be prepared in which additional information will be provided to support the Site's construction and associated traffic management measures.
- 7.208 Overall, it is therefore considered that the proposed development would comply with London Plan Policies GG1, GG2, T1 and T2, CLP Policies T1 and T2, the Transport CPG, NP Policies 5, 7 and 8 and the corresponding aims and objectives of the NPPF.

## Energy & Sustainability

- 7.209 Chapter 14 of the NPPF sets out that developments should be planned for in ways that avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas that are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure; and can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards.
- 7.210 London Plan Policy SI 2 requires major development to be net zero-carbon, reduce greenhouse gas emission and follow the energy hierarchy: be lean, clean, be green and be seen. Major applications should also include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the hierarchy. A minimum on-site reduction of at least 35 per cent beyond Building Regulations is required for major development. Residential development should achieve 10 per cent and non-residential development should achieve 15 per cent through energy efficiency measures. Where the zero-carbon target cannot be fully achieved on site, any shortfall should be provided, in agreement with the borough, either through a cash in lieu contribution to the borough's carbon offset fund or off-site provided that an alternative proposal is identified and delivery is certain.
- 7.211 London Plan Policy SI 3 states that developers should engage at an early stage with relevant energy companies and bodies to establish the future energy and infrastructure requirements arising from large-scale development proposals such as Opportunity Areas, Town Centres, other growth areas or clusters of significant new development. It further states that energy masterplans should be developed for large-scale development locations which establish the most effective energy supply options.
- 7.212 London Plan Policy SI 4 states that major development proposals should demonstrate how these will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with a hierarchy that prioritises passive measures over active measures.
- 7.213 London Plan Policy SI7 seeks to promote a more circular economy that improves resource efficiency and innovation to keep products and materials at their highest use for as long as possible and to encourage waste minimisation and waste prevention through the reuse of materials and using fewer resources in the production and distribution of products. The Policy states that for mayoral referable applications a circular economy statement should be submitted to demonstrate reductions in waste, including the increasing need to consider the re-use of existing buildings.
- 7.214 CLP Policy CC1 requires all development to minimise the effects of climate change and encourages developments to meet the highest feasible environmental standards that are financially viable during construction and occupation. Moreover, all development is required to reduce carbon dioxide emissions in line with the targets set

out within the London Plan. CLP Policy CC2 requires development to be resilient to climate change and states that all development should adopt appropriate climate change adaption measures and promote sustainable design and construction. NP Policy 1 seeks the provision of homes which aim or exceed national environmental standards and for zero carbon homes.

### Energy

- 7.215 The submitted Energy and Overheating Strategy by CGP provides an assessment of the predicted energy performance and carbon dioxide emissions for the proposed development using the London Plan's energy hierarchy (Policy SI 2) Be lean - use less energy and manage demand during operation; Be clean - exploit local energy resources and supply energy efficiently and cleanly; Be green - maximise opportunities for renewable energy by producing, storing and using renewable energy on-site; and Be seen - monitor, verify and report on energy performance.
- 7.216 Regarding 'Be Lean', passive design measures have been considered throughout the pre-planning stage to reduce initial energy demand, the glazing strategy design has carefully considered orientation and window size in order to maximise daylight while controlling excessive solar gains. Glazing will incorporate low emissivity coatings to limit overheating without compromising light transmittance. An overheating study has been undertaken to assess and minimise overheating risks. As part of the 'fabric first' approach, the building fabric has been carefully considered and specified to meet or exceed current Building Regulations minimum requirements and GLA requirements. The building services have also been specified to maximise energy efficiency therefore reducing energy used to deliver services. The design is focused on achieving a low-energy building rather than relying on carbon offsetting mechanisms, committing to the priorities set in the CLP and London Plan.
- 7.217 Regarding 'Be Clean' consideration has been given to the possible connection to and existing or proposed area wide decentralised energy network in line with London Plan Policy SI 3. The submitted Energy and Overheating Strategy confirms there are no heat networks located near the Site and thus the project will not be connected to a DHN and will not be designed for connection. Instead, the proposed development will use an ASHP and photovoltaic panels in accordance with the London Plan heating hierarchy.
- 7.218 Regarding 'Be Green', consideration has been given to a range of low and zero carbon technologies for the proposed scheme, as set out in section D.4 of the Energy and Overheating Strategy. Following an investigation of various technologies and their suitability for the proposed development, PV and ASHP has been confirmed as the most suitable technologies for the Site.
- 7.219 Regarding 'Be Seen', the proposed development will use metering to monitor how much energy the services are using to ensure the building is operated as it was envisaged at design stage, as set out in further detail at section D.5 of the Energy and Overheating Strategy.

- 7.220 The design measures incorporated into the proposed development by means of passive measures have decreased the residential block and PBSA & commercial block's primary energy rate by 85% and 27% respectively from the baseline model analysis. Be Green measures alongside the passive measures for the residential and PBSA & commercial blocks has managed to achieve a further 2% and 40% betterment respectively, resulting in a total improvement of 84% and 67% respectively. These reductions in energy meet the target 35% reduction required by the London Plan. In terms of overheating, utilising the buildings efficient fabric performance, and MVHR's serving habitable rooms, the development passes the Party O criteria.
- 7.221 Overall, as set out in the Energy Statement prepared by CGP, the Site-wide regulated CO2 emissions reductions at each stage of the energy hierarchy for the Proposed Development are as per the below.
- Be Lean: 85%
  - Be Clean: 0%
  - Be Green: 2%
  - Total cumulative savings: 87%

#### Carbon offsetting

- 7.222 As part of the London Plan 2021, developments are required to offset all remaining regulated CO2 emissions associated with the development through a financial contribution. The estimated carbon offset payment for the proposed development is £26,788 based on a current rate of £95 per tonne of CO2 over a 30 year period.

#### Sustainability

- 7.223 A Sustainability Statement has been submitted which concludes that the proposed development will follow the energy hierarchy, incorporating energy efficient design measures and equipment. In seeking to minimise the impacts the development has on the environment, a series of sustainability strategies have been incorporated into the proposed development. The development will employ an efficient building fabric, including efficient insulation and highly efficient glazing, an efficient heating strategy and renewable systems. Measures are also incorporated to minimise pollution, reduce the embodied carbon footprint of the development and reduce water use. The Sustainability Statement demonstrates that the design will holistically incorporate sustainable principles into the development. Full details of these measures are outlined within the supporting Sustainability Statement which accompanies the application.
- 7.224 In addition, the proposed development is targeting BREEAM 2018 New Construction Excellent for both the commercial and PBSA aspects of the development. The supporting BREEAM Pre-Assessments identify that based on the pre-assessment of the Site that a minimum of an 'Excellent' rating is likely to be achieved. For the commercial use the report identifies that an excellent rating of 75.87% has the potential to be achieved, whilst for the PBSA an excellent rating of 74.17% can be achieved.

### Whole life carbon

- 7.225 A Whole Life Carbon Assessment (WLCA) has been submitted to support the planning application. This demonstrates that the projected embodied carbon of the scheme at this early stage is 742 kgCO<sub>2</sub>e/m<sup>2</sup> GIA (OR 617 kgCO<sub>2</sub>e/m<sup>2</sup> GIA once carbon sequestration is accounted for). It is however recognised that the WLCA is an ongoing assessment to be reviewed as the project progress and new information and details are specified, and therefore the assessment identifies several opportunities, to reduce this further as the detailed design of the project progresses.

### Circular economy

- 7.226 The Circular Economy Statement submitted with the application sets out how the proposals meet or exceed the requirements of London Plan Policy SI7. The statement outlines that the circular economy strategy has been developed in collaboration with the design team and the developer and has adopted an overall strategic approach for both the existing buildings on the Site and the proposed new development. A number of key commitments and design strategies have been identified to ensure that the development will contribute towards a circular economy. These involve design decisions to minimise the quantities of materials used, design to eliminate waste, manage waste sustainably and at the highest value. Furthermore, it sets out further decisions that could be made to enhance the buildings' contributions to a circular economy via the design stage, construction, handover and use, and post completion. The end-of-life strategy for the proposed development has been considered from an early stage to ensure it can be simply deconstructed, and has been outlined within the Circular Economy Statement.
- 7.227 In addition, a pre-demolition audit accompanies this analysis which establishes which materials are currently present in the building and identifies opportunities for re-use and recycling of these materials. The audit confirms that the project is targeting a landfill diversion rate of 95% in the majority of waste groups through a combination of re-use, recycle and recovery. It should also be highlighted that the existing structures/buildings on Site clearly could not be repurposed for residential use or other uses that would fit in with the proposed scheme and are not suitable for reuse. Furthermore, it should also be acknowledged that the demolition of these buildings has been granted in previous planning permissions.
- 7.228 Overall, it is therefore concluded that the proposal would comply with London Plan Policies SI 2, SI 3, SI 4 and SI 7, CLP Policies CC1 and CC2, NP Policy 1 and Chapter 14 of the NPPF.

### **Basement Impact**

- 7.229 CLP Policy A5 states that the Council will only permit basement development where it is demonstrated that the proposal would not cause harm to neighbouring properties; the structural, ground, or water conditions of the area; the character and amenity of

the area; and the significance of heritage assets. It advises that in determining proposals for basements and other underground development, the Council will require an assessment of the scheme's impact on drainage, flooding, groundwater conditions and structural stability in the form of a Basement Impact Assessment. The Basement CPG provides further detail on the application of that policy.

- 7.230 In light of those requirements, a Basement Impact Assessment (BIA) prepared by A-squared Studio has been submitted to support the application in which the technical criteria of the policy are discussed in detail, and which concludes that there are acceptable impacts resulting from the basement works. The application is also supported by a Structural Statement which summarises the structural engineering concept design for the proposed development.
- 7.231 In addition to the above, CLP Policy A5 states that the siting, location, scale and design of basements must have minimal impact on, and be subordinate to, the host building and property, and provides a set of specific criteria (criteria f-m) which need to be met.
- 7.232 The BIA concludes that the impacts of the proposed development on neighbouring structure will be limited to Category 0-Negligible, in accordance with the Burland scale. The BIA has concluded that risks to the adjacent properties, public highway and infrastructure (including ultimate and serviceability limit state considerations) are limited and will be mitigated in a reasonable fashion as part of design development. Furthermore, the BIA has concluded that there is no risk of groundwater flooding, no impacts to the wider hydrogeological environment, very low risk of surface water flooding and no impacts to the wider hydrological environment.
- 7.233 Consequently, there are no policy objections in principle to basement development subject to the satisfaction of a number of technical matters and detailed considerations which are all considered in the supporting Basement Impact Assessment and Structural Statement.

### **Flood Risk & Drainage**

- 7.234 The NPPF states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. This guidance is echoed in London Plan Policies SI12 and SI13 and CLP Policy CC3 which advises that development should not increase flood risk, should reduce the risk of flooding where possible and utilise Sustainable Drainage Systems (SuDS) in line with the drainage hierarchy.
- 7.235 The application Site is located within Flood Zone 1 and is therefore identified as having a low risk of flooding.
- 7.236 A Flood Risk Assessment and Drainage Strategy has been submitted with the application which considers flood risk and the drainage strategy for the development.

The report demonstrates that the proposed development is not at risk of flooding and will not increase flood risk at the Site or elsewhere. The flood risk from all sources has been assessed and the proposed development will incorporate a suitable drainage strategy to include use of green roofs and raingardens to attenuate water as well as enhance biodiversity and provide ecological benefits. At roof level, in addition to green roofs, permeable paving is proposed where possible to direct rainfall to permavoid attenuation provided on roofs. At ground level, raingardens are proposed to attenuate runoff from roof level and further attenuation is provided in below ground attenuation tanks to ensure that the proposals do not increase flood risk, at the Site or elsewhere. In summary, the proposal would not have an adverse impact on local flood risk. For full detail please refer to the supporting Flood Risk Assessment and Drainage Strategy.

- 7.237 The proposed development would therefore comply with London Plan Policies SI 12 and SI 13, CLP Policy CC3 and the corresponding objectives of the NPPF.

### **Other Environmental Considerations**

- 7.238 Environmental considerations have been inherent in the evolution of the design of the proposed development. The design team have developed a scheme for the Site which takes into account the existing and emerging Site context and surrounding character and the impacts of the Proposed Development are considered acceptable and to ensure that there are no adverse amenity impacts created by the development.

#### Air Quality

- 7.239 Paragraph 199 of the NPPF confirms that opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.
- 7.240 Good Growth Principle GG3 (Creating a Healthy City) of the London Plan states (Part F) that new development should seek to improve London's air quality, reduce public exposure to poor air quality and minimise inequalities in levels of exposure to air pollution. London Plan Policy SI 1 recognises the importance of tackling air pollution and improving air quality and the health and well-being of its people. Policy SI1 states that development proposals should be at least Air Quality Neutral and use design solutions to prevent or minimise increased exposure to existing air pollution.
- 7.241 CLP Policy CC4 states that the Council will ensure that the impact of development on air quality is mitigated and ensure that exposure to poor air quality is reduced. It advises that Air Quality Assessments (AQAs) are required where development is likely to expose residents to high levels of air pollution.
- 7.242 The proposed development lies within a borough-wide Air Quality Management Area (AQMA).



- 7.243 In support of the application, an Air Quality Assessment has been submitted with the application. The assessment concludes that during the construction phase, with appropriate site-specific mitigation measure, it is anticipated that the risk of adverse effects due to dust emissions from the construction phase will not be significant. Air quality for future residents of the proposed development have also been shown to be acceptable, with concentrations well below the respective air quality objectives and Air Quality CPG criteria throughout the Site. A number of best practice measures have been included within the design of the proposed development to reduce the impact of the proposed development on air quality.
- 7.244 Furthermore, the proposed development is car free and does not include any routine use of on-Site combustion for the routine provision of energy, and it will have a negligible effect on local air quality. The overall operational air quality effects of the proposed development are judged to be 'not significant' and the development will at least be air quality neutral.
- 7.245 The proposed development will therefore lead to no reduction in air quality and is in accordance with the national and local planning policies identified above. For further details please refer to the supporting Air Quality Assessment.
- 7.246 Additionally, the supporting Air Quality Assessment has considered impacts on air quality from the construction and operational phases with and on the wider O2 Masterplan. The assessment concludes that with recommended liaison between construction contractors to ensure plans are coordinated and dust and particulate matter are minimised, and that the O2 Masterplan will adopt appropriate mitigation measures to limit dust emissions, the effect of construction activities from the proposed development with and on the wider O2 Masterplan should be not significant.
- 7.247 The proposed development will be car free and traffic generated by the Proposed Development will be below required criteria to not have significant effects. Therefore, any local air quality impacts with or on the wider O2 Masterplan associated with traffic generated by the proposed development will also remain 'not significant'. Similarly, subject to recommended mitigation measures outlined within the AQA, the impact associated with testing and maintenance of the emergency generator on the wider O2 Masterplan would be not significant. Although the wider O2 Masterplan may also include generators, given the infrequency of operation of such emergency plant which are operated routinely only for testing and maintenance purposes, cumulative effects with the proposed development are considered unlikely.

#### Noise & Vibration

- 7.248 Paragraph 187 of the NPPF seeks to prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of noise pollution. Paragraph 198 of the NPPF states that planning policies and decisions should also ensure that new development is appropriate for its

location taking into account the likely effects of noise pollution on health, living conditions and the natural environment. It states that development should seek to mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development and to avoid noise giving rise to significant adverse impacts on health and quality of life.

- 7.249 London Plan Policy D13 sets out that Agent of Change principle places the responsibility for mitigating the impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development. This means that development should be designed to ensure that established noise and other nuisance-generating uses remain viable and can continue to grow without unreasonable restrictions being placed on them.
- 7.250 London Plan Policy D14 seeks to reduce, manage and mitigate noise to improve health and quality of life, residential and other development proposals should manage noise by avoiding significant adverse noise impacts, on health and quality of life, reflecting the Agent of Change principles (as set out above) mitigating and minimising existing and potential adverse impacts of noise on, from within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on existing noise-generating uses, improving and enhancing the acoustic environment and promoting appropriate soundscapes, separating new noise-sensitive development from major noise sources but where it is not possible to achieve separation of noise-sensitive development and noise sources without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through applying good acoustic design principles.
- 7.251 CLP Policy A1 seeks to manage the impact of development in terms of residential amenity, transport impact and general community impacts. This covers a wide range of matters including noise and vibration levels. CLP Policy A4 further seeks to ensure that noise and vibration is managed.
- 7.252 In support of the application, an Environmental Noise Impact Assessment (NIA) by Quantum Acoustics has been submitted to establish the existing noise levels. The noise climate around the Site is dominated by noise from the adjoining railway to the south and road traffic noise from West End Lane.
- 7.253 The potential risk of the Site has been assessed in accordance with national and local planning policies and guidance. ProPG Stage 1 and Stage 2 assessments have been undertaken.
- 7.254 The Stage 1 assessment concludes that the southern boundary of the Site would be categorised as having a “high” noise risk (without mitigation), with noise levels reducing in a northerly direction. A stage 2 assessment has therefore been undertaken.
- 7.255 The Stage 2 assessment demonstrates:
- The scheme follows a good acoustic design process to mitigate noise levels;

- The proposed development can be designed to deliver appropriate internal noise levels;
- The proposed development embeds appropriate design strategies for providing access to good quality external amenity space for future residents;
- The required mitigation strategies should not create any unintended adverse consequences for future residents and the proposed development is therefore considered to comply fully with relevant national and local planning policy; and
- The proposed development does not raise any agent of change concerns in relation to existing neighbouring business or community use facilities.

7.256 Regarding impacts from the proposed student accommodation, Home for Students will be the accommodation manager and operator for the student accommodation. In the interests of ensuring the operations of the student accommodation are sensitive and respectful to the amenity of neighbouring occupiers a Student Management Plan has been submitted as part of this application. This ensures that a professional accommodation management service is provided to deliver safe and clean accommodation for students, and includes a series of measures and management controls which would be implemented at the Site to ensure that the proposed future occupation would not have a detrimental impact on neighbouring amenity or the area in general.

7.257 It is, therefore, concluded that the Proposed Development complies fully with London Plan Policies D13 and D14, CLP Policies A1 and A4, and paragraph 198 of the NPPF.

7.258 As with the consented O2 Masterplan permission, and specifically Plot S8 (14 Blackburn Road), the proposed development will involve the removal of the existing builders' merchant yard on Site. This will have a positive impact on neighbouring properties as traffic noise along Blackburn Road will be reduced significantly as a large percentage of vehicle movements along Blackburn Road are attributed to comings and goings to and from the existing Site. In this respect the proposed development will provide the same benefits to the existing noise climate as the O2 Masterplan. The noise climate at the Site is unlikely to change significantly as a result of the remaining O2 Masterplan as the noise climate is dominated by the underground line to the south of the Site and road traffic noise from West End Lane, both of which will be unchanged due to the development. It should also be highlighted that full planning permission is sought for the proposed development, and includes details as to how the building is designed to protect the future residents from the local noise climate. The O2 Masterplan only provides a parameter plan for Plot S8, with no detailed plans detailing how the S8 development will protect the amenity of future residents.

#### Contaminated Land

7.259 London Plan Policy SI 10 states that development proposals should ensure that impacts to environment, heritage and amenity values must be considered, including land contamination.

7.260 The Mayor of London has introduced a Good Practice Note in March 2020 on how to deal with contaminated land. This note explains the various roles and responsibilities

and advises on best practices. For applications to redevelop contaminated land, planning conditions and Section 106 obligations should be used to require further technical reports, studies, and mitigation measures. It is advised that financial contributions from developers be secured through Section 106 to cover the costs of monitoring compliance.

- 7.261 CLP Policy A1 seeks to protect the quality of life of occupiers and neighbours and states that development will not be granted which causes unacceptable harm to amenity, ensuring consideration is given to contamination of land when assessing development proposals. The supporting text to the policy states that the Council will expect proposals for the redevelopment of sites that are known to be contaminated, have the potential to be contaminated, or are located in close proximity to such sites to submit relevant assessments and take appropriate remedial action if required.
- 7.262 The application has been submitted with a Phase I Desk Study which provides a qualitative Preliminary Risk Assessment for the proposed development. The ground conditions at the Site are anticipated to comprise made ground overlying the London Clay Formation. The assessment identifies potential contaminant linkages but with a maximum 'low to moderate risk' classification, but where potential unacceptable risks have been identified to human health of future users and buildings, further geo environmental investigation is required.
- 7.263 The assessment concludes that any proposed soft landscaping on Site will be formed of clean and chemically suitable imported materials for planters and so have no risk to human health for the future occupiers. Whilst risks may exist in the temporary condition during the construction works and associated risks to construction works, these will need to be managed by the contractor and can be controlled by condition. Furthermore, risks to site workers and the environment during the construction phase of the proposed redevelopment can be appropriately considered and mitigated by the principal contractor in their preparation and implementation of construction phase risk assessment method statement and construction phase plan.
- 7.264 Finally, the assessment concludes that a Stage 2 Detailed Risk Assessment is recommended in order to further assess the risk to any future works. This desk study should be made available to those preparing the operational site Health & Safety File for the proposed development.
- 7.265 Should planning permission be granted, it is considered that further assessment and mitigation/remediation measures as required can be controlled by suitably worded planning conditions.
- 7.266 Given the above, the proposed development would comply with London Plan Policy SI 10 and CLP Policy A1 with respect to the consideration of contaminated land.

## Wind Microclimate

7.267 London Plan Policy D8 (Part J) states that development should take into consideration microclimate considerations including wind for the purposes of people in the public realm. London Plan Policy D9 Part C (3) requires that development considers the microclimatic impacts of tall buildings including wind, daylight, and sunlight penetration around the building and neighbourhood.

7.268 CLP Policy A1 states that the Council will grant planning permission for development unless this causes unacceptable harm to amenity. The policy sets out several factors that will need to be considered including microclimate. CLP Paragraph 6.24 further states that:

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

7.269 The application is submitted with a Pedestrian Wind Microclimate Assessment which sets out the wind microclimate conditions at and around the Site, with regards to both wind safety and the suitability for intended pedestrian uses and compares conditions with and without the proposed development to assess the impact of the proposed development on the local wind microclimate. The assessment has tested five configurations including:

- Configuration 1: Existing Site with existing surrounding buildings;
- Configuration 2: proposed development with proposed on-Site landscaping and existing surrounding buildings;
- Configuration 3: Consented scheme with O2 Masterplan and existing surrounding buildings;
- Configuration 4: proposed development with proposed on-Site landscaping, O2 Masterplan and existing surrounding buildings; and
- Configuration 5: proposed development with proposed on-Site landscaping, O2 Masterplan and cumulative surrounding buildings.

7.270 In the baseline scenario (Configuration 1), wind conditions at the Site and surrounding area are suitable for the current uses. Introduction of the proposed development massing (Configuration 2) would marginally increase the windiness along Blackburn Road. However, wind conditions would remain suitable for the intended uses. With the introduction of the updated proposed landscaping at the terrace levels, the proposed seating spaces would be expected to have wind conditions suitable for the intended use during the summer season. There would be no significant difference in wind conditions at and around the proposed development (Configuration 3) and the consented massing of the proposed development (Configuration 4). Finally, inclusion of the cumulative schemes (Configuration 5) would not materially impact the wind conditions at and around the proposed development. As such, with the updated proposed terrace landscaping wind conditions at and around the proposed

development would be suitable for the intended uses and the off-Site areas would have wind conditions materially the same as those Configuration 1.

- 7.271 For the reasons above, the impact of the proposed development would be acceptable in respect of impacts on microclimate, in accordance with London Plan Policies D8 and D9 and CLP Policy A1. Please refer to the Pedestrian Wind Microclimate Assessment for full details.

### **Daylight, Sunlight & Overshadowing**

- 7.272 London Plan Policy D6 (Housing quality and standards) states that design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context.
- 7.273 CLP Policy A1 sets out how the Council will manage the impact of development to protect the quality of life of occupiers and neighbours. The policy states that planning permission will be granted unless it causes unacceptable harm to residential amenity. To protect residential amenity, the Council will consider a variety of factors including sunlight, daylight and overshadowing.
- 7.274 A Daylight and Sunlight report has been submitted as part of the planning application which has regard to the criteria and methodology within the 'Site Layout Planning for Daylight and Sunlight: a Guide to good Practice' published by the Building Research Establishment 2022 (BRE Guide). It considers both the Vertical Sky Component (VSC) and Daylight Distribution (DD) tests.
- 7.275 BRE Guide recognises that it should not form a mandatory set of criteria, rather it should be used to help and inform design. It states that greater flexibility in terms of acceptable daylight/sunlight targets in dense urban areas (where a higher degree of obstruction is unavoidable), having regard to the undeveloped nature of an existing site and where a neighbouring property might be built close to the boundary of a development site. In dense urban environments mid-teen VSC levels can be sought rather than 27% as required by the VSC test). Windows beneath balconies may receive less light and sunlight owing to the balcony above and the BRE Guide suggest this is taken into account (by removing balconies prior to testing) when considering shortfalls to neighbouring properties. The following provides a summary of the main conclusions from the report.

#### External daylight/sunlight

- 7.276 The external daylight and sunlight analysis has considered only habitable rooms to residential properties which are sufficiently proximate to experience daylight and sunlight impacts as a result of the proposed development. The analysis has compared the existing (baseline) massing, the implemented consent, the O2 Masterplan permission (Plot S8) and the Proposed Development.
- 7.277 The following properties were assessed as part of the analysis:

- 3 (including rear block), 5, 7 and 9 Blackburn Road
- 11 Blackburn Road (Proposed Clockwork Warehouse Development)
- Clockwork Factory Apartments
- Haywood House – IQ Student Accommodation
- 168-178 (odd) ,180-188, 190, and 192-198 Broadhurst Gardens
- 102,104, 112a, 124, 124a, 134-136 West End Lane

- 7.278 An external daylight and sunlight assessment has been undertaken for the proposed development in accordance with the BRE Guide “*Site Layout Planning for Daylight and Sunlight*” (2022). As is typical for developments in dense urban locations, some impacts on neighbouring properties have been identified. However, these have been carefully considered and, on balance, are deemed acceptable within the context of local character, existing built form, and applying the principles established in recent appeal decisions.
- 7.279 While some windows and rooms within surrounding properties experience shortfalls against the strict BRE criteria—particularly in terms of Vertical Sky Component (VSC)—many of these shortfalls are modest, and several are influenced by existing constraints such as balconies, single aspect layouts, or close proximity to neighbouring massing. In a number of cases, the affected rooms already receive low levels of daylight, meaning absolute changes are small. Where properties do fall short, most still achieve levels close to or above the mid-teens threshold (circa 15%) established as acceptable in dense urban contexts, such as in the appeal cases of *Holy Trinity* and *Whitechapel*, as set out in the Daylight & Sunlight Report.
- 7.280 Daylight Distribution analysis has also been undertaken to provide a more comprehensive understanding of internal light levels. Here, many rooms continue to perform well against dense urban precedents, also when compared to those properties affected by other consented schemes in the area. Notably, in several instances the proposed development performs comparably or more favourably in some respects than Plot S8 of the O2 Masterplan, with fewer or less severe shortfalls in neighbouring buildings.
- 7.281 In terms of sunlight, the vast majority of surrounding rooms meet or exceed the aspirations in the BRE Guide, including both annual and winter sunlight targets. Where shortfalls exist, they are minor in most areas and, again, consistent with the expectations of development in a central London context (i.e. a dense urban location).
- 7.282 The BRE Guide recognises that its criteria are based on a suburban context and should be applied more flexibly in urban settings such as this, where a higher degree of enclosure and lower baseline light levels are to be expected. In this regard, the proposed development achieves an appropriate balance between optimising site potential and maintaining an acceptable level of amenity for surrounding occupiers in this high-density urban environment.

- 7.283 While some shortfalls against the BRE Guide are inevitable in a high-density urban context, the external daylight and sunlight effects of the proposed development are, on the whole, consistent with policy expectations and compare favourably to Plot S8 of the O2 Masterplan. Many of the affected properties already have design constraints or are commercial in nature, and several impacts are less severe than those from previously approved developments. When applying the BRE Guide flexibly and pragmatically, as advised for city-centre and brownfield redevelopment sites, the impacts are considered acceptable and policy compliant.

#### Internal Daylight and Sunlight

- 7.284 Internal daylight to the proposed development will comply fully with the aspirations of the BRE Guide to all habitable rooms except those located beneath north facing external walkways (the deck access) to the C3 component.
- 7.285 Several rooms beneath the walkways have shortfalls against the BRE Guide due to the 'poor neighbour design' of the massing to 13 Blackburn Road and secondly due to the access walkways, to the proposed development, which are located above the windows facing north. The proposed massing to 13 Blackburn Road is considerably higher than the existing massing and is located close to or on its own boundary – unfairly restricting development potential. This contributes to the already dense urban environment, limiting sky visibility available to the north facing windows to the proposed development. Combined with a walkway above the windows the sky visibility is further restricted.
- 7.286 Of the 33 rooms experiencing shortfalls, against the aspirations of the BRE Guide, 11 are bedrooms, the remainder being kitchen/dining rooms. The BRE Guide states that daylight to bedrooms is less important than other room uses. The kitchen element of the kitchen/dining rooms sit directly behind the windows with restricted views of sky. This kitchen space is small and would be deemed non-habitable under the Mayor's Supplementary Planning Guidance (which states that kitchens of 13 - 15 sqm should be considered non habitable). Given the above and with daylight shortfalls to approximately 10% of the 322 rooms tested these derogations can be supported against the strict aspirations of the BRE Guide, as these aspirations are set for suburban locations, whereas the proposed development is in an urban location. In terms of internal sunlight to the proposed development, all windows will receive adequate sunlight and will fully comply with the strict aspirations of the BRE Guide for suburban contexts.

#### Overshadowing

- 7.287 The Daylight and Sunlight Report confirms that having regard to the nature and extent of nearby neighbouring amenity spaces, there will not be any adverse impacts on ground impacts to neighbouring residential amenity spaces. The proposed development will therefore comply with the tests laid down within the BRE Guide. Furthermore, the proposed amenity areas within the proposed development (at 1st and 6th floors) will achieve 2 hours sun on ground (on 21 March) to more than 50% of their area. This is fully compliant with the aspirations of the BRE Guide.



7.288 In summary, as set out in the supporting Daylight and Sunlight Report, the analysis demonstrates that despite any shortfall within BRE Guidance, the resulting daylight, sunlight and overshadowing impacts are acceptable. In areas where compliance with the aspirations of the BRE Guide is more challenging, for reasons outlined above, any derogations would be justified, particularly given the under-developed nature of the existing baseline condition, the location of the Site within the West Hampstead Interchange Area - which seeks better use of sites and, necessarily, greater density and having regard to the comparable daylight and sunlight impacts as the O2 Masterplan Plot S8. The proposed development is therefore considered to have acceptable daylight, sunlight and overshadowing impacts and would be compliant with the aims of London Plan Policy D6 And CLP Policy A1.

### **Health Impact**

7.289 London Plan Policy GG3 states that development must assess the potential impacts of development proposals on the mental and physical health and wellbeing of communities to mitigate any potential negative impacts, maximise positive impacts and help reduce health inequalities through the use of Health Impact Assessments (HIA). CLP Policy C1 requires proposals for major developments to include a HIA.

7.290 The application is supported by a HIA which considers the potential effect of the proposed development on the surrounding area as well as the health impacts expected for future residents on the following 11 key health determinants:

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

7.291 Health-related impacts on future users, as well as the wider community, have been assessed against an existing baseline and geographic comparators at varying spatial levels. The HIA confirms that the proposed development will have a neutral effect on access to healthy foods and will have a positive effect on the remaining health determinants. In summary, the proposed development is expected to have a positive effect on health for people on-Site and in the surrounding area. The proposal therefore accords with Policy GG3 of the London Plan and CLP Policy C1.

## **Regeneration Benefits**

- 7.292 The proposed development is a large mixed-use scheme providing significant new homes and commercial space and the scheme has significant potential for job creation and significant local economic benefits. LBC's Local Validation requirements state that for all major applications, a supporting statement should be submitted identifying any regeneration benefits from the proposed development.
- 7.293 The application has been submitted with a Regeneration Statement which has been undertaken to identify the likely economic impacts of the proposed development. The following summarises the key regeneration benefits of the proposal.
- 7.294 During the demolition and construction phase, the Proposed Development is expected to generate an average of 429 direct FTE jobs and 142 indirect and informal FTE jobs per year over the duration of its 30-month construction period.
- 7.295 Once complete and operational, the proposed development is expected to generate a net increase of 28 to 47 FTE jobs, including 23 to 39 direct FTE jobs and 5 to 8 indirect and induced FTE jobs. The additional direct employment is anticipated to generate up to £151,380 per year in operational worker expenditure. As well as this, the proposed development is expected to generate a total of £2.19 million per year in residential expenditure, creating 7 FTE jobs. £1.18 million of this expenditure is expected to stay within LBC.
- 7.296 Furthermore, in comparison with Plot S8 (14 Blackburn Road) of the consented O2 Masterplan permission, the proposed development is expected to produce a number of economic and employment benefits. 1,619 sqm GIA of commercial floorspace is proposed (or 1,742 sqm when taking into account the café space at the base of the PBSA), which is a 979 sqm increase compared with the existing Site, and 569 sqm increase compared with the O2 Masterplan consent for Plot S8. The proposed employment floorspace could generate up to 87 FTE on Site jobs, which is an increase of 52 FTE jobs compared with the existing Site and 27 FTE jobs compared with the O2 Masterplan consent for Plot S8. Approximately £201,000 of annual employee expenditure is expected to be retained locally in Camden as part of the proposed development, representing an increase of approximately £120,000 and £62,000 annually compared with the existing Site and the O2 Masterplan consent for Plot S8, respectively.

## **Employment & Training**

- 7.297 London Plan Policy E11 requires development proposals to support employment, skills development and apprenticeships and other education and training opportunities. CLP Policies E1 and E2 seeks to secure employment and training opportunities for local residents and opportunities for businesses based in the Borough to secure contracts to provide goods and services. CPG Employment Sites and Business Premises (2021) sets out that the Council will use S106 agreements to secure local employment and

training initiatives and an element of affordable workspace from large scale employment schemes.

- 7.298 The submitted Regeneration Statement includes a proposed Employment and Training Strategy which sets out a clear commitment to support and deliver employment and training commitments, construction apprenticeships and construction work experiences placements, local construction recruitment and local procurement in accordance with London Plan Policy E11 and CLP Policies E1 and E2.

### **Safety & Security**

- 7.299 London Plan Policy D8 requires public realm to be well-designed, safe, accessible and inclusive. London Plan Policy D11 requires schemes to work with Designing Out Crime Officers (DOCOs) to design and maintain a safe and secure environment that reduces fear of crime. It also deals more generally with safety, security, and resilience to emergency. It states that development proposals should maximise resilience and minimise potential physical risks including those resulting from extreme weather, fire, and flood. CLP Policy C5 requires that developments incorporate design principles which contribute to community safety and security.
- 7.300 The application has been submitted with a Security Strategy report which addresses the security risks and associated requirements for the proposed development. The report highlights that the existing Site conditions have fostered an environment where antisocial behaviour, including graffiti, drug use, and vandalism have become prevalent. The lack of natural surveillance, inactive frontages, and underutilised spaces have contributed to an atmosphere of neglect, encouraging criminal activity and reducing the safety of the area.
- 7.301 The proposed development directly addresses the above vulnerabilities through a high-quality design, and a considered mix of uses that will activate the Site throughout the day and evening. The strategy recognises the potential security risks associated with the proposed uses and location, and describes a strategic approach to mitigating these risks effectively. It recommends an integrated approach, comprising a balanced adoption of Crime Prevention through Environmental Design (CPTED) principles, namely active frontages, improved lighting and landscaping, physical and technical security measures, and operational procedures.
- 7.302 In summary, by transforming this underperforming site into a vibrant and well-overlooked gateway to the wider O2 Masterplan, the development will not only mitigate existing security concerns but will also create a safer and more inclusive urban environment. The proposal would therefore comply with London Plan Policy D8 and D11 and CLP Policy C5.

## 8 Planning Obligations

### Community Infrastructure Levy

- 8.1 The Mayor of London's Community Infrastructure Levy 2 (MCIL2) is a tariff chargeable by the GLA on new development. The Site is located within Band 1 and on this basis all floorspace within the proposed development is subject to the £80 per sqm tariff as per table 1 'MCIL 2 Charging Rates for all development in London' of the MCIL 2 Charging Schedule document.
- 8.2 At a local level, the LBC's CIL Charging Schedule (2020) splits the borough into 3 zones for CIL charging purposes, with the Site falling in Zone B. On this basis the CIL rates for the land uses within the proposed development are as follows:
- Residential development of 10 or more dwellings: £322 per sqm (it should be noted that subject to the correct procedures being followed the proposed development will qualify for social housing relief)
  - Student housing: £515 per sqm
  - Other commercial uses: £32 per sqm

### Section 106 Obligations

- 8.3 In response to pre-application discussions with LBC and the GLA, a S106 contribution note dated 18/10/2024 was prepared and sent to LBC to confirm the methodology as to how the contributions for the proposed development can be calculated to ensure it honours the planning contributions to be delivered by the O2 Masterplan, and that the uplift in development quantum is matched by commensurate increases in any linked contributions.
- 8.4 Following this a meeting was held to seek agreement from LBC that this methodology is fair and appropriate in order to meet these objectives. LBC confirmed a broad in principle agreement with the Heads of Terms (HoTs) and methodologies set out subject to further consideration and detail. Further details of the legal obligations to be agreed within the S106 Agreement will be subject to further discussions during the course of the application.
- 8.5 Obligations will be in accordance with Regulation 122(2) of the Community Infrastructure Levy Regulations 2010 (as amended) which states that obligations may only constitute a reason for granting planning permission for the development if they are:
- Necessary to make the development acceptable in planning terms;
  - Directly related to the development; and
  - Fairly and reasonably related in scale and kind to the development.
- 8.6 The HoTs will be largely based on those included within the S106 Agreement associated with the O2 Masterplan, along with the requirements associated with the proposed development itself, as follows:

## 8.7 Financial Contributions:

- Legible London signage
- Travel plan monitoring and support
- Environmental and public realm contribution
- Highway works
- Off-site disabled parking space
- E-bikes and rental e-scooter bays
- Electric vehicle charging provision
- CPZ Review
- Billy Fury Way and Granny Dripping Steps improvement works
- West Hampstead underground station improvements/step free access
- Contribution apprentice support
- CMP Support Contributions
- CMP Impact Bond
- Public Open Space
- Children's Play Space
- Public realm improvements
- Construction Work Placement Default Contribution
- Carbon Offset Contribution
- Employment and Training
- Healthcare facility contribution
- Monitoring contribution

8.8 The O2 Masterplan includes upgrades to Blackburn Road and the creation of the 'east to west route', as shown illustratively on the submitted plans as part of that permission. The Applicant has confirmed commitment to achieving the delivery of the associated works via a joint S106/S278 agreement with LBC, to be entered into at the time the permission is granted. The works can be delivered by either the Applicant or LBC at the Applicant's expense. The Applicant would also work with Landsec to ensure coordinated delivery of highway upgrade works, and to working with LBC to ensure a consistent quality and finish so that there is consistency across O2 Masterplan/SPD area.

8.9 It should further be noted that the proposed development could also involve the physical delivery of other works for which financial contributions are sought in the O2 Masterplan S106 Agreement (such as improvements to public realm/Granny Dripping Steps).

8.10 LBC have previously raised concerns around the proposed development hindering the delivery of the healthcare facility to be provided as part of the O2 Masterplan. However, the O2 Masterplan S106 Agreement is very clear that the facility will come forward as part of the physical development of plot N7 (Outline West) of the O2 Masterplan. Despite the fact that the onus appears to be on the developer of plot N7 to deliver the healthcare facility, in response to the Council's concerns, it is considered that a reasonable contribution towards its delivery can be calculated, as previously discussed with LBC.

8.11 Non-financial Contributions:

- Local procurement plan
- Demolition management plan
- Construction working group
- Travel Plans
- Car free development
- Construction logistics plan
- Affordable housing quantum, mix, eligibility, delivery plan, triggers for provision, occupancy restrictions, rent limits, delivery plan etc
- Play space delivery and management/ maintenance plan
- Digital connectivity strategy
- Delivery and servicing management plans
- Remedial works S278
- Apprentice/s placement
- Management Plans for both PBSA and Affordable Housing
- Energy plan
- Sustainability review
- Be Seen commitment to uploading energy data (check with CGP)
- Affordable housing handed over to a Registered Provider upon completion
- Marketing, allocation and fit out of the wheelchair units within affordable housing and student accommodation
- Social rent service charges within the rent cap
- Future proofing to allow connection to a future district heating system if it becomes available in the future.
- Parking permits

8.12 The above legal obligations would ensure the proposed development contributes positively toward the delivery of the O2 Masterplan.

8.13 These draft Heads of Terms are provided without prejudice and are subject to detailed discussions with officers during the process of determination of the application.

## 9 Conclusions

- 9.1 This Planning Statement demonstrates that the proposed development at 14 Blackburn Road presents a compelling and policy-compliant case for approval. The application responds positively to the emerging and adopted planning policy context, and aligns with both the strategic objectives of the London Plan (2021) and the Camden Local Plan (2017), as well as material considerations including the draft new Camden Local Plan, the West End Lane to Finchley Road SPD (2021), and guidance from LBC, the GLA and TfL.
- 9.2 The proposal represents a sustainable, inclusive, and high-quality redevelopment of a site currently underutilised, and contributes meaningfully to local housing and employment needs. It brings forward a comprehensive mixed-use scheme that not only supports the regeneration of the West Hampstead Growth Area but also improves upon the previously consented O2 Masterplan (Plot S8) in a number of important respects.
- 9.3 Key policy objectives are met through the co-location of genuinely affordable family housing, purpose-built student accommodation (PBSA), and employment-generating commercial floorspace, including the retention of a well-established local business (Builder Depot Ltd), delivering continuity of economic activity and supporting Camden's local workforce.
- 9.4 The proposed development would also deliver:
- A significant contribution to meeting housing targets, including affordable and family homes, exceeding policy-compliant tenure mix;
  - Reprovision of long-standing employment floorspace for BDL and the potential for new employment opportunities;
  - High quality design with substantial improvements to public realm and pedestrian safety;
  - Meaningful contributions to Camden's student housing targets and responding to an identified need at a neighbourhood level;
  - High sustainability and biodiversity credentials including an Urban Greening Factor score of 0.4 and 1483% Biodiversity Net Gain;
  - Integration into the wider vision for the West Hampstead interchange and surrounding regeneration area.
- 9.5 In line with Paragraph 11 of the NPPF (2024), the presumption in favour of sustainable development applies. The proposal delivers substantial public benefits, which significantly and demonstrably outweigh any perceived or less than substantial harm (such as townscape impacts), particularly when considered against the fallback position under the extant 2004/2024 Permission and the outline O2 Masterplan consent.

**Public Benefits Comparison Table – Proposed Development vs O2 Masterplan (Plot S8)**

<b>Category</b>	<b>Proposed Development (14 Blackburn Road)</b>	<b>O2 Masterplan Consent (Plot S8)</b>	<b>Uplift / Commentary</b>
<b>Affordable Housing (C3 units)</b>	35 units (79% Social & 21% Intermediate by habitable room)	27–31 units	4–8 additional affordable units (and tenure mix in favour of more Social)
<b>Affordable Family Homes (3+ bed)</b>	12 units	7 units	+5 affordable family homes
<b>Affordable Housing (% by HR)</b>	100% affordable C3, and 41% affordable by habitable room (across the aggregate of the C3 and PBSA)	Lower provision	Exceeds Camden's 50% target for affordable C3 and the London Plan 35% fast track threshold
<b>Student Accommodation (PBSA)</b>	192 student beds	None	Contributes to meeting other identified needs for housing and creating a mixed and balanced community while freeing up existing C3 housing stock
<b>Total Residential (C3 + PBSA equiv.)</b>	Equivalent to 111 conventional homes	69–87 homes	+24–42 additional homes overall
<b>Commercial / Employment Floorspace (GIA)</b>	1,619 sqm (1,742 sqm with café)	1,173 sqm	+569 sqm
<b>FTE Jobs Generated (on site)</b>	87	60	+27 jobs
<b>Retention of Existing Business (BDL)</b>	Yes – with HoT for pre-let secured (35 jobs saved at the Site and another 25 in the wider business serving the Site)	No – no provision for BDL (35 +25 jobs lost)	Prevents business displacement
<b>Active Frontage (Blackburn Rd)</b>	122m (78%)	112m	+10m active frontage (with the scenario)



			connecting through to the TfL station)
<b>Pavement Widening</b>	3.5m average	2.4m	Improved pedestrian safety and public realm
<b>Publicly Accessible Café</b>	Yes – integrated with PBSA amenity space	No café specified	Community integration benefit
<b>Urban Greening Factor (UGF)</b>	0.408	Not confirmed	Exceeds GLA targets
<b>Biodiversity Net Gain</b>	1483%	Not confirmed	Significant ecological uplift
<b>Construction Timeline</b>	Completion by 2029	Construction of Plot S8: 2030–2033	Accelerated delivery by 3–4 years
<b>Annual Local Spend (residential + PBSA)</b>	£1.183 million	£1.087 million	+£96,000 local economic uplift
<b>Construction Jobs</b>	429 FTE	Not confirmed	Significant local training/employment benefit
<b>Annual Employee Expenditure</b>	£201,000	£139,000	+£62,000
<b>CIL Contributions</b>	Yes	Yes	Earlier receipt and greater contribution given uplift in floorspace

- 9.6 In conclusion, this proposal not only meets the strategic aspirations for this Growth Area but demonstrably improves on a previously consented outline scheme for the same Site. The development represents a better use of the land, offering enhanced social, economic, and environmental benefits. It is deliverable now and is aligned with both local aspirations and regional objectives for sustainable urban intensification.
- 9.7 Taking the development plan as a whole, the proposal is in strong accordance with the statutory development plan and material considerations weigh even further in favour of approval. The development represents a sustainable, inclusive, and locally responsive regeneration project that will unlock the full potential of a key opportunity site in Camden.
- 9.8 The Applicant therefore respectfully requests that the London Borough of Camden grant full planning permission for this well-considered and beneficial scheme, without delay.