

AGAR GROVE

PLANNING STATEMENT

DECEMBER 2013



**Document prepared on behalf of the London
Borough of Camden (Applicant) by:**



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1.0 INTRODUCTION

- 1.1 This Planning Statement has been prepared by CMA Planning on behalf of Camden's 'Housing and Adult Social Care' (HASC) Department ("the applicant") in support of a planning application for the regeneration of the Agar Grove Estate within the London Borough of Camden.
- 1.2 The Agar Grove project forms part of Camden's 'Community Investment Programme' (CIP) which aims to generate investment, deliver new homes and regenerate neighbourhoods. The CIP is a 15 year plan and forms a central part of the Council's strategy which seeks to ensure investment in schools, homes and community infrastructure can be realised despite wider economic circumstances.
- 1.3 Agar Grove Estate was constructed by the London Borough of Camden in the 1960s and comprises some 249 units, of which 210 are let to Council tenants with 36 owned by leaseholders and 3 by freeholders. The Estate consists of a series of low / medium rise blocks and an 18 storey tower (Lulworth House).
- 1.4 The Estate is home to a stable and cohesive community including many householders who have lived there for a number of years and are established in the area. However, despite being a popular place to live, the existing stock suffers from a number of problems ranging from physical defects to the size, type and quality of the accommodation relative to housing needs. Furthermore, the existing configuration of the Estate represents an inefficient use of land given its accessible and sustainable location.
- 1.5 The project has been the subject of extensive consultation with existing residents and the application proposals have been developed in response to the views of the community and other key stakeholders. This consultation has helped to establish the overarching brief for the project which comprises:
- Demolition of the existing low-rise blocks and comprehensive refurbishment / extension of Lulworth House
 - Creation of new homes to re-house existing Camden tenants in response to their current housing needs and to current design / space standards, including a single decant for the majority of tenants

- Creation of additional new homes including private, shared-ownership and social rent to foster a mixed and inclusive community
- Replacement community and retail facilities and creation of new small scale business space
- Appropriate open and amenity space to support the development and contribute towards the creation of a high-quality environment

1.6 The application proposals have been sensitively designed in response to a detailed analysis of the site and local context taking into account the character of the area and the applicant's objective of delivering a high-quality development. Furthermore, the project has been the subject of detailed discussion with the local planning authority and other key stakeholders who have helped to inform the application proposals.

Purpose and Structure

- 1.7 All development proposals take place in the context of national, regional and local planning policy and recognised best practice. This development is notable in that it accords with The London Plan and Camden Local Development Framework and the latest national guidance in respect of delivering sustainable development and regeneration.
- 1.8 This document reviews the planning context for the issues associated with the development and is structured as follows:
- **Section 2** provides a description of the site and surrounding area;
 - **Section 3** provides an overview of the application proposals;
 - **Section 4** sets out the planning policy context for the project;
 - **Section 5** considers the key planning issues associated with the development; and
 - **Section 6** sets out our summary and conclusions
- 1.9 This document forms part of a series of reports submitted in support of the application and should be read in conjunction with these other documents which include:
- Design and Access Statement by Hawkins Brown, Mae and Grant Associates
 - Transport Assessment by PBA
 - Sustainability and Energy Assessment by Max Fordham
 - Flood Risk and Drainage Report by PBA
 - Ecology Report by MKA
 - Arboricultural Impact Assessment by Haydens
 - Daylight and Sunlight Assessment by Anstey Horne
 - Air Quality Assessment by PBA
 - Land Condition Report by PBA
 - Wind Micro-Climate Report by PBA
 - Noise and Vibration Report by PBA
 - Planning Obligation Statement by CMA Planning
 - Affordable Housing Statement by CMA Planning
 - Statement of Consultation by Camden Housing and Regeneration

2.0 SITE AND SURROUNDINGS

- 2.1 A full description of the site and surrounding area is provided in the Design & Access Statement, including a detailed analysis of the local context which has been a key consideration in formulating the application proposals.

The Application Site

- 2.2 As illustrated in Figure 2.1 below the site comprises a 2.75 hectare parcel of land known as the Agar Grove Estate. The Estate is centrally located in the borough to the east of Camden town in a predominantly residential area which comprises a mix of period (Georgian and Victorian) housing; post-war municipal estates; 20th century in-fill; and some remnants of light-industrial activity.
- 2.3 The Estate is bordered to the north by Agar Grove beyond which sits an area of mid-to-late 19th century high-quality terraces and villas focused around Camden Square.
- 2.4 To the east lies Camley Street which is occupied by low-rise light-industrial units. Beyond Camley Street lies the mainline railway into St Pancras and then the 1960s Benson and Forsyth Maiden Lane Estate which is also undergoing refurbishment as part of the Council's estates programme. Further to the south-east is the Kings Cross development area. To the south is the London Overground railway line beyond which sits a pocket of low-rise 20th century housing. To the west is a predominantly residential area heading back towards Camden town.



Figure 2.1: Aerial Site Plan

- 2.5 The Estate currently comprises a series of free-standing blocks surrounded by areas of open space which were laid out in response to solar orientation but do not measure well against today's principles of good urban design and place-making. As a result the Estate comprises a series of "objects in space" with a lack of definition between buildings and spaces; poor resolution of fronts and backs; poor legibility with expanses of green space with no clear programme of use; and an urban form which is detached from the wider area.
- 2.6 The Estate comprises 249 residential homes of which 210 are social rented units; 2 is intermediate (affordable); and 37 are market as illustrated in Table 1 below. The existing units are arranged in a series of blocks known as: Manston, Broadstone, Sherborne, Sturminster, Ashmore, Nettelcombe, Frampton and Abbotsbury (all 1-4 storeys in height) and Lulworth House (18 storeys).
- 2.7 It should be noted that full survey information of the existing accommodation on site is not available; however, an estimate of existing units / floorspace has been generated from the detailed Housing Needs Survey which has been undertaken as part of the project and calibrated against survey information where available.
- 2.8 Further details of the methodology used to calculate the areas is provided at Appendix **CMA 1**.
- 2.9 Within the Estate there are two small retail units to the Agar Grove frontage (circa. 200sqm in total) and a Children's Nursery to the south of Lulworth House (824sqm). The Estate also includes two blocks of housing (known as Cranbourne and Ferndown) along the eastern boundary which are not included within the application site boundary.

Table 1: Existing units			
NUMBER OF BEDS	SOCIAL RENT	INTERMEDIATE	MARKET
Studio	16	0	1
One bed	27	0	7
Two bed	97	0	3
Three bed	55	2	22
Four bed	14	0	4
Other	1	0	
TOTAL	210	2	37



The Site levels were once higher on the western part of the estate, evidenced by the levels existing trees on raised mounds.



The north-south axial orientation of the blocks does not acknowledge the enclosure given by the Victorian Villas on the opposite side of Agar Grove



Poorly defined routes through the estate



Figure 2.2: Photographs of the Estate

Planning History

- 2.10 The statutory register indicates that the planning history relating to the application site is limited as set out in Table 1.2 below.

Table 2: Planning History		
DATE	DESCRIPTION	REFERENCE
26.10.72	Erection of a day nursery for 50 children. Approved	CTP/13/11/A/14873
12.04.85	Provision of mono-pitch roods clad in grey coating ribbed metal sheeting. Sherbourne and Sturminster. Approved	8500251
21.12.93	Erection of a new concierge suite, office meeting room, refuse facilities and entrance lobbies at Lulworth House Approved	9301617
25.11.96	Demolition of garages and redevelopment to provide 3 houses and 12 flats and associated landscaping. Approved	PE9606087
26.11.97	Environmental improvements including formation of children's play area, landscaping, new walls, paths, seating and lighting, resurfacing hard standing areas, new railings and gates. Approved	PE9700869
06.02.01	Alterations to provide secure entrance doors and screens and door systems. Approved	PEX0100105
21.05.02	Replacement of existing domestic wall and floor mounted boilers with the installation of new balanced flues on the external elevation of Lulwoth House. Approved	PEX0200436
13.08.02	Installation of 1.8m high perimeter fence together with erection of new bin stores and associated new security doors, screen and entry ramps. Approved	PEX0200566
15.11.13	Request for Environmental Impact Assessment (EIA) Screening Opinion for works associated with the regeneration of the Agar Grove Estate. EIA not required	2013/7118/P

Conservation and Heritage

- 2.11 The application site is not located within a Conservation Area and there are no statutorily listed buildings within the Estate. However, as illustrated in Figure 2.4 below, there are a number of designated areas which form part of the wider setting of the site including: the Camden Square Conservation Area; Camden Broadway Conservation Area; and Rochester Conservation Area.
- 2.12 Camden Square Conservation Area was designated in October 1974 and has been extended on two occasions (1980 and 2002). The Conservation Area is a primarily 19th Century inner London suburb laid out as a planned development, in a gridded street layout running parallel and perpendicular from Camden Road.
- 2.13 The Camden Broadway Conservation Area was designated in 2005 and is located between Camden Town and Kentish Town close to Camden Town Station. It is a small area comprising a mix of commercial and residential properties. St Pancras Way forms the north-eastern boundary and the area contains a short length of Camden Road, a short length of Royal College Street, the north side of Randolph Street and all of Rousden Street.
- 2.14 Rochester is a compact Conservation Area and comprises a cohesive area of 1840s and 1850s housing centred on the park of Rochester Terrace Gardens.
- 2.15 There are a limited number of listed buildings within close proximity of the site, including:
- (i) 111-121 (odd) St Pancras Way (grade II): a terrace of early 19th century houses approximately 80metres to the west of the site; and
 - (ii) Telephone kiosk (grade II) at the junction of Agar Grove and Murray Street approximately 20 metres to the north-east of the site.

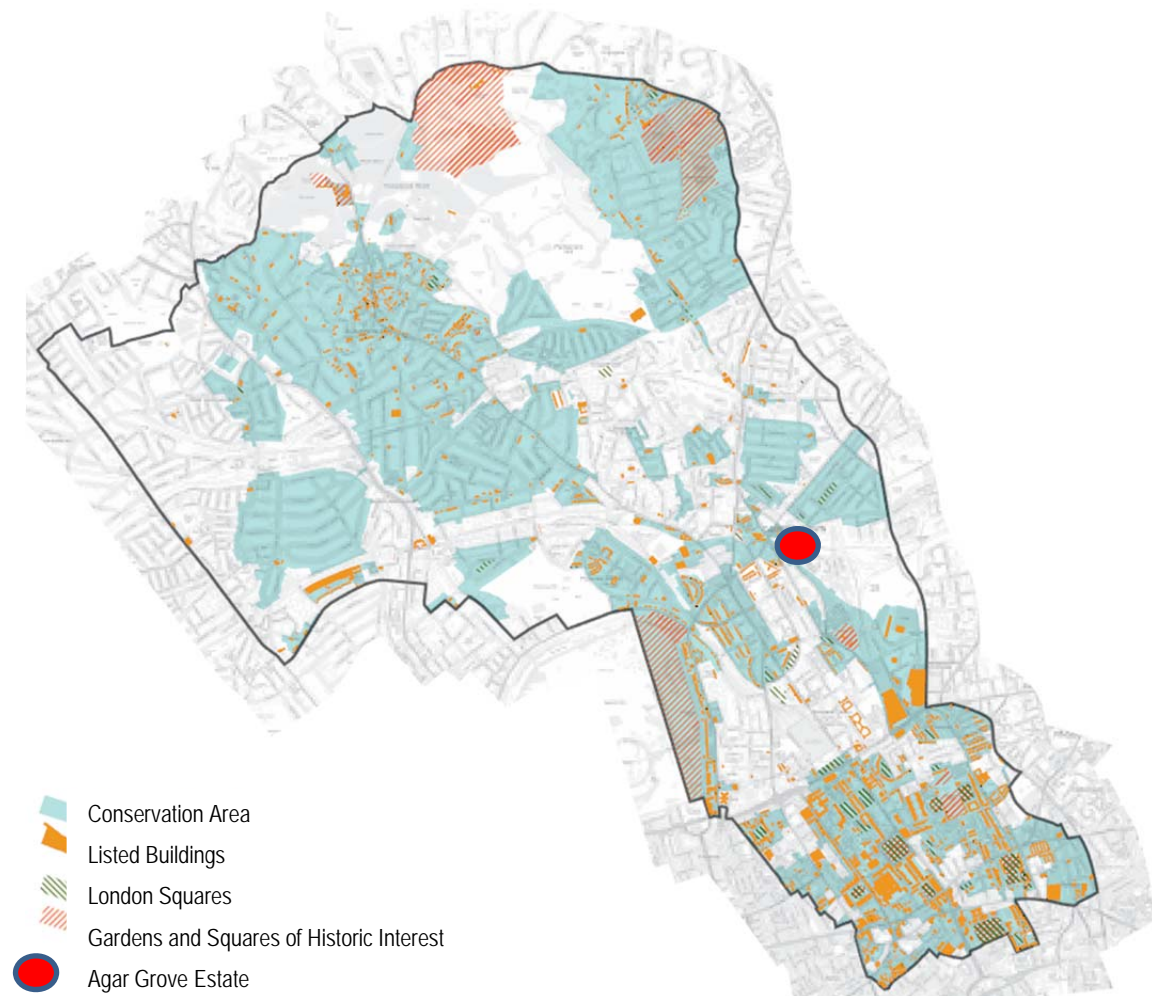


Figure 2.3: Heritage assets (source: Camden LDF)

Transportation

- 2.16 As set out in the Transport Assessment which accompanies the application the site is extremely well served by public transport being within easy walking distance of Camden Road Station (London Overground) and Camden Town (Northern Line) along with numerous bus services which serve the local area.
- 2.17 The site has a Public Transport Accessibility Level (PTAL) of 6a / 5 around the perimeter of the site demonstrating its accessibility and sustainability credentials.
- 2.18 Pedestrian and cycling facilities in the local area are also good and a Pedestrian Environment Review (PERS) audit of the local area reviews that there are no significant areas for concern in the surrounding pedestrian network.

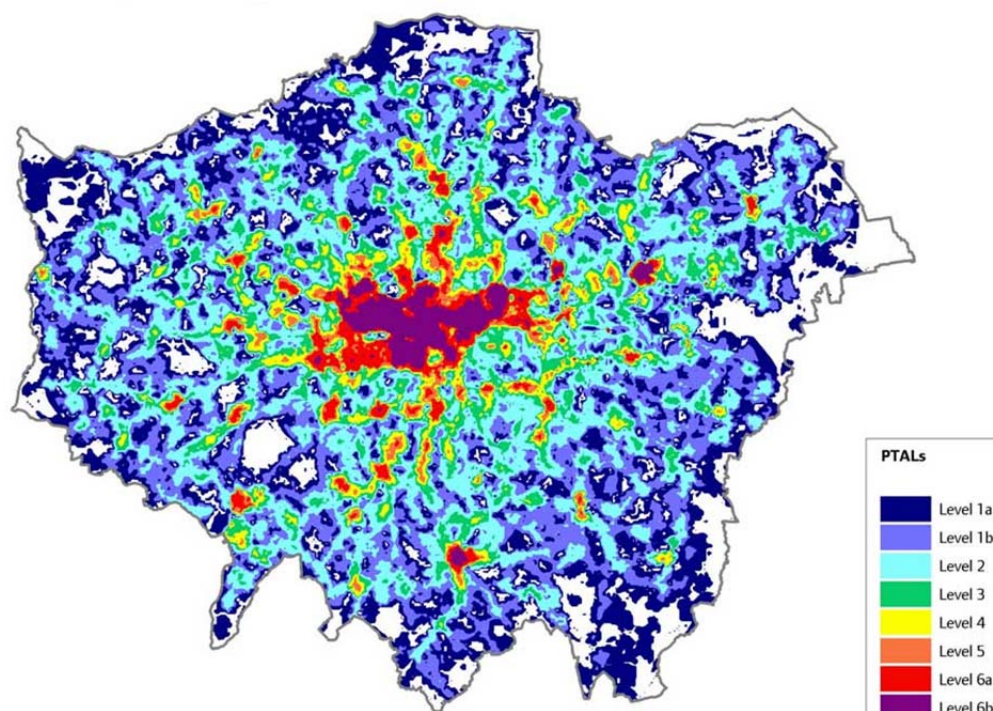


Figure 2.4: PTAL Map (source: TfL)

The Floodplain

- 2.19 As illustrated in Figure 2.5 below the site falls within Flood Zone 1 which is defined as being outside the floodplain and / or an area liable to flooding (less than 1 in 1000 year risk).

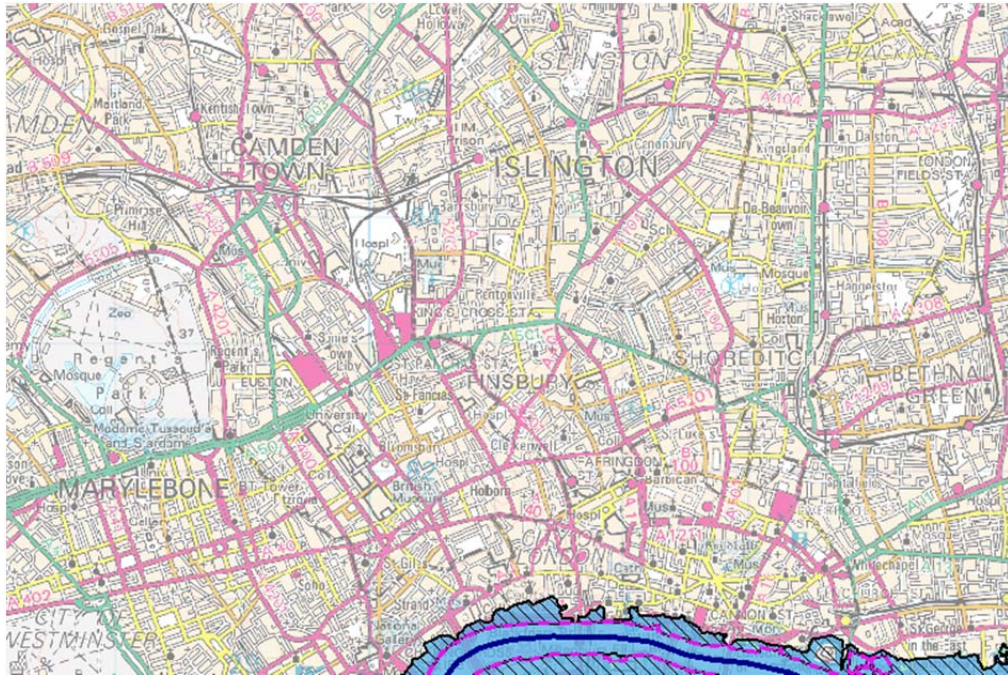


Figure 2.5: Flood Map (source: Environment Agency)

3.0 SUMMARY OF PROPOSED DEVELOPMENT

Project Overview

- 3.1 The project forms part of Camden's 'Community Investment Programme' (CIP) which aims to generate investment, deliver new homes and regenerate neighbourhoods. The CIP is a 15 year plan and forms a central part of the Council's strategy which seeks to ensure that investment in schools, homes and community facilities can be realised despite wider economic circumstances.
- 3.2 The Estate is home to a stable and cohesive community, including many households who have lived there for a number of years and are established in the area. However, the existing stock has significant investment needs and the homes are undersized when compared to current space standards.
- 3.3 The Agar Grove Estate was included in the CIP programme in July 2011 as a site with potential for development and one with investment needs. Following positive initial consultation with residents in March and June 2012 the application proposals have been formulated over an 18 month period in close consultation with residents who have played a key role in shaping the brief for the regeneration of their neighbourhood.
- 3.4 If approved, the Agar Grove regeneration will be the largest residential development in the CIP and will see 249 dwellings replaced with 493 high-quality new homes within a high-quality environment that is integrated with the wider area.
- 3.5 The design team of Hawkins\Brown, MAE and Grant Associates were appointed in February 2013 after a competitive tendering process and have collaboratively developed the application proposals in response to the project brief.
- 3.6 Over the last 10 months the design team have developed the application proposals through a detailed pre-application process with the local planning authority and other key stakeholders who have informed the submitted proposals. In addition, the community (both existing Estate residents and the wider area) have been actively engaged throughout the design process via a series of exhibitions, workshops and one-to-one meetings.

The Application Proposals

3.7 A detailed description of the application proposals is provided in the 'Design and Access Statement' which supports the application.

3.8 In summary the application seeks permission for:

"Demolition of all existing buildings and structures except Lulworth House and Agar Children's Centre (249 existing Class C3 residential units and 2 retail units), and erection of new buildings ranging between 4 and 18 storeys in height along with the refurbishment and extension of Lulworth House (extending from 18 to 20 storeys in total) to provide a total of 493 Class C3 residential units, comprising 240 market, 37 intermediate and 216 social rent units; a community facility (Class D1); 2 retail units (Class A1 / A3); business space (Class B1(a)); refuse and recycling facilities; car and cycle parking facilities; landscaping / amenity space; and associated works"



Figure 3.1: Sketch Overview of the Proposals

Masterplan, Site Layout, Scale and Massing

- 3.9 The overriding design objective is to *stitch-in* with the local area and create a development that is a natural extension of the city not a stand-alone estate as currently exists. This is achieved through a masterplan based on “streets and squares” with an emphasis on building typologies which have front doors at street level and create liveable spaces between them.
- 3.10 The masterplan creates a series of streets which connect back to the wider area and create meaningful opportunities for pedestrian (and cycle) movement across, through and within the site. These streets are framed by a mix of building types (terraces, villas, mansion block, towers) to create diversity and interest in type, scale and appearance.
- 3.11 The proposals step down in scale towards to the Agar Grove frontage in response to the medium-rise development to the north of the site, whilst building height increases towards the south-east corner (adjacent to railway and towards Kings Cross / Central London) including a new 20 storey tower which provides a new home for the existing occupiers of Lulworth House.
- 3.12 A considered and conscious decision to retain the existing Lulworth House has been made on sustainability grounds; however, the building will be stripped back to its concrete skeleton and then extended, re-configured and re-clad to create high-quality new homes.
- 3.13 A diversity of architecture is achieved across the project through the collaboration of two practices; however, this is held together by a joined-up approach towards materials and detailing which includes a predominance of brick and celebration of domestic ornamentation.

Public Realm, Landscape and Open-space

- 3.14 The existing Estate has large areas of green space; however, they are poorly surveyed, lack definition and have no active programme of use. The masterplan aims to provide more useable open space for public and communal use including: green streets and spaces, private and communal gardens and a new central square

which provide opportunities for movement, (integrated) play, recreation, bio-diversity and visual amenity.

- 3.15 The masterplan also includes extensive planting that will enhance the ecological value of the site with improved species diversity and a response to climate change with tree shading, water sensitive urban design and sustainable urban drainage systems.

Access, Parking and Servicing

- 3.16 The masterplan seeks to create a liveable environment that is prioritised for pedestrians and cyclist and reduces reliance on private-car based travel. The streets and squares approach stems from a contextual masterpanning approach that creates a legible hierarchy of public and private space.
- 3.17 Whilst vehicle access is catered for to facilitate deliveries and refuse collections it is within a pedestrian priority environment. Notwithstanding, the development needs to work at a practical level including taking a positive approach towards limited vehicle parking, refuse collection, deliveries and emergency vehicles. However, the site layout and circulation has been devised to ensure that there “is no other reason” for a vehicle to enter the site unless it should or needs to.
- 3.18 57 car-parking spaces are provided although parking will be limited to Blue Badge holders and existing residents who have a parking permit on the Estate. Beyond this the development will be car-free. Cycle parking is provided on a block-by-block basis in secure and convenient storage areas within the shared_courtyards or adjacent to cores.

Sustainability and Energy

- 3.19 The application proposals incorporate a number of active and passive sustainability measures in order to reduce the environmental footprint of the development as well tackling issues associated with fuel poverty by adopting a strategy that will provide long-term benefits for residents in terms of both environmental performance and in-use considerations.

- 3.20 At an early stage in the design process the Council (as applicant) opted to develop the scheme in accordance with 'Passivhaus' principles (for the new build elements) which is an energy performance standard that minimises heating costs through superinsulation, triple glazing and air-tight construction along with heat recovery of mechanically vented air.
- 3.21 Passivhaus represents the ultimate design standard in terms of the 'be lean' aspect of energy policy with carbon emissions being primarily reduced by implementing passive energy efficiency to reduce the demand for energy rather than meet a larger demand with renewable energy sources. The refurbishment of Lulworth House also achieves high environmental standards using the BREEAM residential refurbishment assessment tool.
- 3.22 As set out in the accompanying report the scheme has been designed in direct response to the guidance set out in The London Plan and the GLA 'Sustainable Design and Construction Supplementary Guidance' and includes measures to:
- Re-use brownfield land
 - Conserve energy, materials, water and other waste
 - Ensure the designs make the most of natural systems both within and around the buildings
 - Reduce the impacts of noise, pollution, flooding and micro-climate effects
 - Ensure developments are comfortable and safe for users
 - Conserve and enhance the natural environment particularly in relation to bio-diversity
 - Promote sustainable waste behaviour
- 3.23 As a result of these measures the proposals will achieve a 32% reduction in carbon dioxide (CO₂) emissions when compared to the current Building Regulations and has been designed in accordance with Passivhaus standards for the new-build elements and BREEAM Domestic Refurbishment for Lulworth House.

Mix of Uses and Accommodation Schedules

- 3.24 The development will deliver a total of 493 new homes comprising 216 socially rented units, 37 intermediate units and 240 units for market sale. The redevelopment also includes: a replacement café and convenience store; new community facilities; and new Class B1 employment space.
- 3.25 An overarching objective of the project is to enable the existing community to remain together through the regeneration process and so the proposals have been developed as a series of phases that will allow existing residents to watch their new homes being built and then move in as a single decant.
- 3.26 Table 3 below provides a summary of the proposed residential units by type, tenure and plot / phase.

Table 3: Mix of units by type, tenure and plot				
UNIT TYPE	PROPOSED UNITS			
Studio	21			
One bed	191			
Two bed	200			
Three bed	56			
Four bed	25			
TOTAL	493			

	Social Rent	Intermediate	Market	TOTAL
Plot A	38			38
Plot B	105			105
Plot C D	14			14
Plot E	20			20
Plot F	14			14
Plot G			23	23
Plot H	20			20
Plot I	5	33		38
Plot J K L			73	73
Lulworth		4	144	148
TOTAL	216	37	240	493

4.0 PLANNING POLICY CONTEXT

4.1 All development proposals take place within the context of national, regional and local planning policy and recognised best practice and the planning authority will be required by statute to determine the application in accordance with relevant development plan policies unless other material considerations indicate otherwise.

4.2 For this purpose, the statutory development plan comprises The London Plan (2011), the Camden Local Development Framework (2010).

4.3 Within the following paragraphs we set out the planning policy context within which the applications should be considered.

National Planning Policy Framework (NPPF)

4.4 The National Planning Policy Framework (NPPF) was published in March 2012 and forms a key part of the Government's reforms to make the planning system less complex and more accessible, to protect the environment and to promote sustainable growth.



4.5 The overarching objective of the NPPF is for the planning system to contribute to the achievement of sustainable development which is defined as comprising three dimensions from which the planning system needs to perform a number of roles namely:

- an economic role;
- a social role; and
- an environmental role

4.6 The NPPF makes it clear that these roles should not be undertaken in isolation and that, in order to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system.

4.7 At the heart of the NPPF is a presumption in favour of sustainable development which is identified as a golden thread running through both the plan-making and

decision making process. As a corollary to this the NPPF sets out a number of core planning principles that should underpin decision-making including:

- Encouraging the effective use of land by re-using land that has previously been developed (“brownfield”), provided that it is not of high environmental value.
- Always seeking to secure high-quality design and a good standard of amenity for all existing and future occupants of land and buildings.
- Locating developments that generate significant movement where the need to travel will be minimised and the use of sustainable transport modes can be maximised.
- Delivering a wide choice of high-quality homes with housing applications considered in the context of the presumption in favour of sustainable development.
- Promoting the opportunity for meetings between members of the community who might not otherwise come into contact with each other, including through mixed-use development and active street frontages, which bring together those who work, live and play in the vicinity.
- Planning for new development in locations and ways that reduce greenhouse gas emissions and supports the move to a low carbon future; ensuring sustainability standards are in line with the Government’s zero carbon buildings policy; having regard to local requirements for decentralised energy supplies; avoiding inappropriate development in areas at risk of flooding and prioritising the use of Sustainable Urban Drainage Systems.

4.8 In terms of new housing the NPPF makes it clear that LPA’s need to meet the ‘full, objectively assessed needs for market and affordable housing’ and that they should plan for five years’ worth of housing including an additional buffer of 5% (or 20% for authorities with a record of under-delivery) to ensure choice and competition in the market for housing land (para. 47).

4.9 Para. 49 of the NPPF states that ‘housing applications should be considered in the context of the presumption in favour of sustainable development’.

The London Plan (2011) (as amended)

A. Strategic Vision and Objectives

- 4.10 The current London Plan published in July 2011 forms part of the statutory development plan for the area and provides the strategic framework for the boroughs along with the Mayor's planning policies for the capital.
- 4.11 The London Plan sets out the Mayor's overarching vision that London should: *'excel among global cities – expanding opportunities for all its people and enterprises, achieving the highest environmental standards and quality of life and leading the world in its approach to tackling the challenges of the 21st century, particularly that of climate change'* (para. 1.5).
- 4.12 Building upon this vision the Plan sets out six key objectives for London as follows:
- a. A city that meets the challenges of economic and population growth
 - b. An internationally competitive and successful city
 - c. A city of diverse, strong, secure and accessible neighbourhoods
 - d. A city that delights the senses
 - e. A city that becomes a world leader in improving the environment
 - f. A city where it is easy, safe and convenient for everyone to access jobs, opportunities and facilities



B. Site Designations

4.13 The following designations in The London Plan are relevant to the application site:

(a) 'Inner London '

4.14 Camden falls in the 'Inner London' zone where the Mayor seeks to sustain and enhance its recent economic and demographic growth, whilst also improving its distinct environment, neighbourhoods and public realm, supporting and sustaining existing and new communities, addressing its unique concentration of deprivation, and improving quality of life and health for those living, working, studying or visiting there.

Map 2.2 Outer London, Inner London and Central Activities Zone

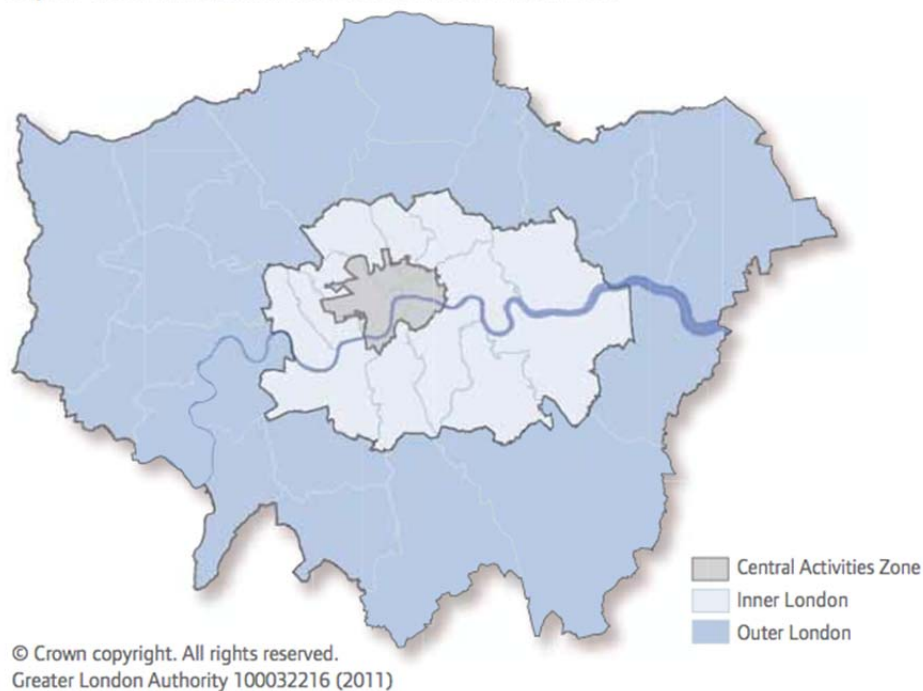


Figure 4.1: Extract from The London Plan (2011) *source: GLA*

(b) Protected Vistas

4.15 The Mayor has designated a list of strategic views which include significant buildings or urban landscapes that help to define London at a strategic level. The application site falls within the 'London Panoramas' from Parliament Hill and Kenwood to central London, whilst the 'Protected Vistas' of St Paul's Cathedral from these locations pass just inside the eastern and western boundaries of the site.

4.16 The protection of the strategic views is managed via the 'London View Management Framework' (LVMF) which seeks to ensure that new development should not harm, and where possible should make a positive contribution to, the characteristics and composition of the strategic views and their landmark elements.

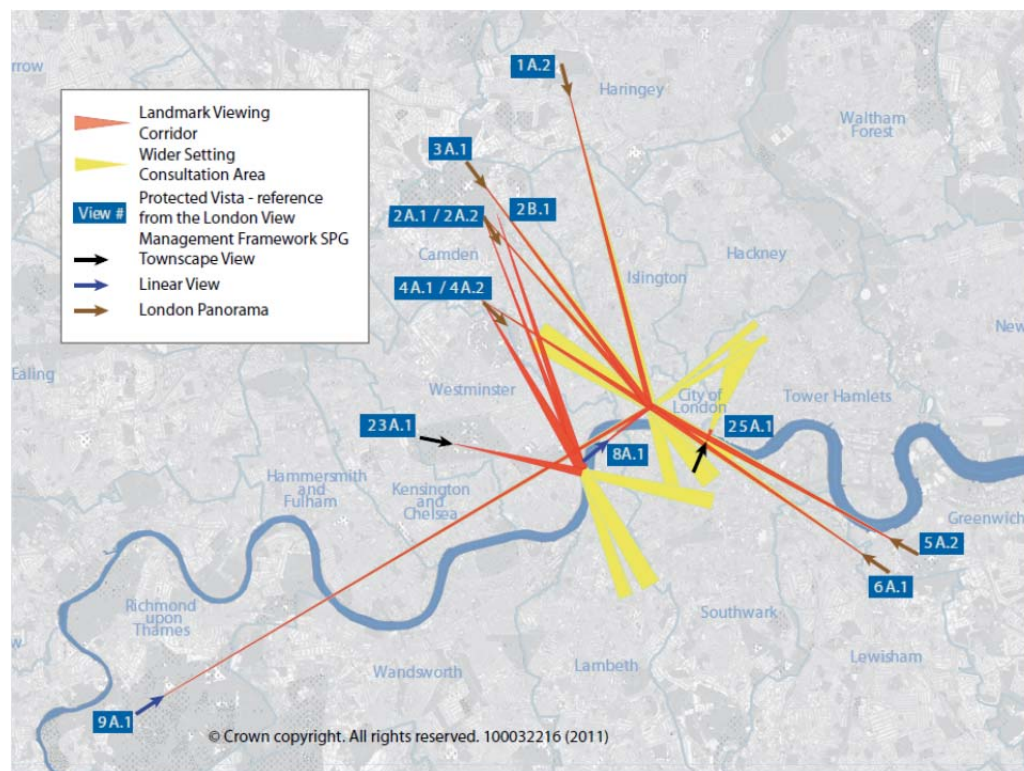


Figure 4.2: Extract from The London Plan (2011) source: GLA

C. Strategic Policies

Housing

4.17 *Policy 3.3 – Increasing Housing Supply:* Sets out the pressing need to provide more homes for London and states that borough's should identify and seek to enable development capacity to be brought forward to meet targets. The policy sets an annual average monitoring target of 664 units per year for Camden.

4.18 *Policy 3.4 – Optimising Housing Potential:* States that taking into account local context and character and public transport accessibility development should optimise housing output having regard to the following density matrixes:

Setting	Public Transport Accessibility Level (PTAL)		
	0 to 1	2 to 3	4 to 6
Suburban	150-200 hr/ha	150-250 hr/ha	200-350 hr/ha
3.8-4.6 hr/unit	35-55 u/ha	35-65 u/ha	45-90 u/ha
3.1-3.7 hr/unit	40-65 u/ha	40-80 u/ha	55-115 u/ha
2.7-3.0 hr/unit	50-75 u/ha	50-95 u/ha	70-130 u/ha
Urban	150-250 hr/ha	200-450 hr/ha	200-700 hr/ha
3.8-4.6 hr/unit	35-65 u/ha	45-120 u/ha	45-185 u/ha
3.1-3.7 hr/unit	40-80 u/ha	55-145 u/ha	55-225 u/ha
2.7-3.0 hr/unit	50-95 u/ha	70-170 u/ha	70-260 u/ha
Central	150-300 hr/ha	300-650 hr/ha	650-1100 hr/ha
3.8-4.6 hr/unit	35-80 u/ha	65-170 u/ha	140-290 u/ha
3.1-3.7 hr/unit	40-100 u/ha	80-210 u/ha	175-355 u/ha
2.7-3.0 hr/unit	50-110 u/hr	100-240 u/ha	215-405 u/ha

Figure 4.3: Extract from The London Plan (2011) source: GLA

4.19 *Policy 3.5 – Quality and Design of Housing Developments:* States that housing development should be of the highest quality internally and externally and in relation to their wider context and to the wider environment. The design of all new housing should enhance the quality of local spaces, taking into account physical context, local character; density; tenure and land-use mix; and relationship with, and provision of, public, communal and open spaces, taking particular account of the needs of children and older people.

4.20 *Policy 3.6 – Children and Young Peoples Play and Informal Recreation Facilities:* States that housing proposals should make provision for play and informal recreation based on the expected child population generated by the scheme and in

accordance with the Mayor's SPG "*Providing for Children and Young People's Play and Informal Recreation*".

- 4.21 *Policy 3.7- Large Residential Developments*: States that proposals for large-residential developments including complementary uses are encouraged in areas of high public transport accessibility.
- 4.22 *Policy 3.8 – Housing Choice*: States that new development should offer a range of housing choices, in terms of mix of housing type and sizes, taking account of the housing requirements of different groups and the changing roles of different sectors in meeting these. The policy states that the provision of affordable family housing is a strategic priority, that development be built to 'The Lifetime Homes Standards and should make provision for wheelchair users (10%).
- 4.23 *Policy 3.9 – Mixed and Balanced Communities*: States that communities mixed and balanced by tenure and housing income should be promoted across London in order to foster social diversity, redress social exclusion and strengthen communities' sense of responsibility for, and identify with, their neighbourhoods.
- 4.24 *Policy 3.10 - Affordable Housing*: States that affordable housing includes social rented and intermediate housing provided to specified eligible households whose needs are not met through the market. Recently published minor alterations to the London Plan include 'affordable rented housing' within this definition.
- 4.25 *Policy 3.11 – Affordable Housing Targets*: States that the Mayor will, and boroughs should, seek to maximise affordable housing provision and ensure an average of at least 13,200 more affordable homes per year in London with a tenure split of 60% rented and 40% intermediate housing. The policy states that priority should be afforded to provision of affordable family housing.
- 4.26 *Policy 3.12 – Negotiating Affordable Housing on Individual Private and Mixed Use Schemes*: States that the maximum reasonable amount of affordable housing should be sought have regard to: current and future requirements; the need to encourage rather than restrain development; the need to promote mixed and balanced communities; the size and type of affordable housing needed in particular locations; and the specific circumstances of individual sites.

- 4.27 *Policy 3.14 – Existing Housing:* States that the loss of housing, including affordable housing, should be resisted unless the housing is replaced at existing or higher densities with at least equivalent floorspace.
- 4.28 With regard to estate renewal the policy notes that development should take into account the regeneration benefits to the local community, the proportion of affordable housing in the surrounding area and the amount of affordable housing intended to be provided elsewhere in the borough. Where redevelopment of affordable housing is proposed it should not be permitted unless it is replaced by better quality accommodation providing at least an equivalent floorspace of affordable housing.

Climate Change

- 4.29 *Policy 5.2 – Minimising Carbon Dioxide Emissions:* States that development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the energy hierarchy of: be lean; be clean; be green. Major developments should meet targets for carbon dioxide reductions emissions set at 40% beyond 2010 Building Regulations for 2013-2016.
- 4.30 *Policy 5.3 – Sustainable Design and Construction:* Seeks to secure the highest standards of sustainable design and construction including through: minimising carbon dioxide emissions; avoiding overheating; efficient use of natural resources; minimising pollution and waste; avoiding impacts from natural hazards; ensuring developments are comfortable for users; securing sustainable procurement; and promoting / protecting biodiversity.
- 4.31 *Policy 5.6 – Decentralised Energy in Development Proposals:* States that development proposals should evaluate the feasibility of Combined Heat and Power (CHP) systems and, where appropriate, examine opportunities to extend the system beyond the site boundary.
- 4.32 *Policy 5.7 – Renewable Energy:* States that major development proposals should provide a reduction in carbon dioxide emissions through the use of on-site renewable energy where feasible.

- 4.33 *Policy 5.8 – Overheating and Cooling:* States that major development proposals should reduce potential overheating and reliance on air condition systems.
- 4.34 *Policy 5.10 – Urban Greening:* States that the Mayor will promote and support urban greening and development proposals should integrate green infrastructure from the beginning of the design process.
- 4.35 *Policy 5.11 – Green Roofs and Development Site Environs:* States that major development should be designed to include roof, wall and site planting, especially green roofs and walls where feasible to deliver: adaptation to climate change; sustainable urban drainage; mitigation of climate change; enhancement of biodiversity; accessible roof scape; improvements to the appearance and resilience of the building; and growing food.
- 4.36 *Policy 5.12 – Flood Risk Management:* States that development proposals must comply with the flood risk assessment and management requirements set out in PPS25.
- 4.37 *Policy 5.13 – Sustainable Drainage:* States that development should utilise sustainable urban drainage systems (SUDS) and should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible.
- 4.38 *Policy 5.15 – Water Use and Supplies:* States that development proposals should seek to minimise the use of mains water including through incorporating water saving measures.

Transport

- 4.39 *Policy 6.3 – Assessing Effects of Development on Transport Capacity:* States that development proposals should ensure that impacts on transport capacity / network at both a corridor and local level are fully assessed.
- 4.40 *Policy 6.9 – Cycling:* States that development proposals should provide secure, integrated and accessible cycle parking facilities in line with minimum standards.

4.41 *Policy 6.10 – Walking:* States that development proposals should ensure high quality pedestrian environments and emphasise the quality of the pedestrian and street spaces.

4.42 *Policy 6.13 – Parking:* States that development proposals should adhere to maximum parking standard; provide parking for disable users; and cycle parking.

Design and Place-Shaping

4.43 *Policy 7.1 – Building London’s Neighbourhoods and Communities:* States that development should be designed so that the layout, tenure, and mix of uses interface with surrounding land and improve people’s access to social and community infrastructure (including green spaces), the Blue Ribbon Network, local shops, employment opportunities, commercial services and public transport.

4.44 *Policy 7.2 – An Inclusive Environment:* States that development proposals should achieve the highest standards of accessible and inclusive design.

4.45 *Policy 7.3 – Designing Out Crime:* States that development should reduce opportunities for criminal behaviour and contribute to a sense of security.

4.46 *Policy 7.4 – Local Character:* States that development proposals should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings.

4.47 *Policy 7.5 – Public Realm:* States that development proposals should make the public realm comprehensible at a human scale; landscape treatment, street furniture and infrastructure should be of the highest quality.

4.48 *Policy 7.6 – Architecture:* States that architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape.

4.49 *Policy 7.7 – Location and Design of Tall Buildings:* States that applications for tall or large buildings should include an urban design analysis. Proposals should generally be limited to the CAZ; should not unduly compromise the local area; should be of the highest design quality; improve the legibility of an area; and make a significant contribution to local regeneration.

- 4.50 *Policy 7.14 – Improving Air Quality:* States that development proposals should minimise increased exposure to existing poor air-quality; promote sustainable design and construction to reduce emissions from demolition and construction works; and be ‘air-quality neutral’.
- 4.51 *Policy 7.15 – Reducing Noise and Enhancing Soundscapes:* States that development proposals should seek to reduce noise by: minimising the existing and potential adverse impacts of noise on, from, within, or in the vicinity of, development proposals; separating new noise sensitive development away from major noise sources wherever practicable through the use of distance, screening, or internal layout in preference to sole reliance on sound insulation; and promoting new technologies and improved practices to reduce noise at source.
- 4.52 *Policy 7.18 – Protecting Local Open Space and Addressing Local Deficiency:* States that the loss of protected open space must be resisted unless equivalent or better quality provision is made within the local catchment area.
- 4.53 *Policy 7.19 – Biodiversity and Access to Nature:* States that development should, wherever possible, make a positive contribution to the protection, enhancement, creation and management of biodiversity.
- 4.54 *Policy 7.21 – Trees and Woodland:* States that existing trees of value should be retained and any loss as the result of development should be replaced by following the principle of ‘right place, right tree’. Wherever appropriate, the planting of appropriate additional trees, should be included in new developments, particularly large-canopied species.

Local Development Framework

Camden Proposals Map (2010)

4.55 As illustrated in Fig 4.4 below the site is not identified for any specific development proposal but is subject to the following designations¹:

- (i) 'Open Space': a small area within the north-west quadrant of the site is identified as open space.
- (ii) 'Designated View': the landmark viewing corridor and lateral assessment areas associated with the protected vistas from Parliament Hill and Kenwood towards St Paul's Cathedral pass just inside the eastern and western site boundaries

4.56 The Proposals Map also identifies that the area to the north of Agar Grove and west of Wrotham Road form part of the Camden Square and Camden Broadway Conservation Areas respectively, whilst the Rochester Conservation Area lies approximately 360m to the north-west.

4.57 A designated 'Neighbourhood Centre' is located along Murray Street a short distance to the north of the site.

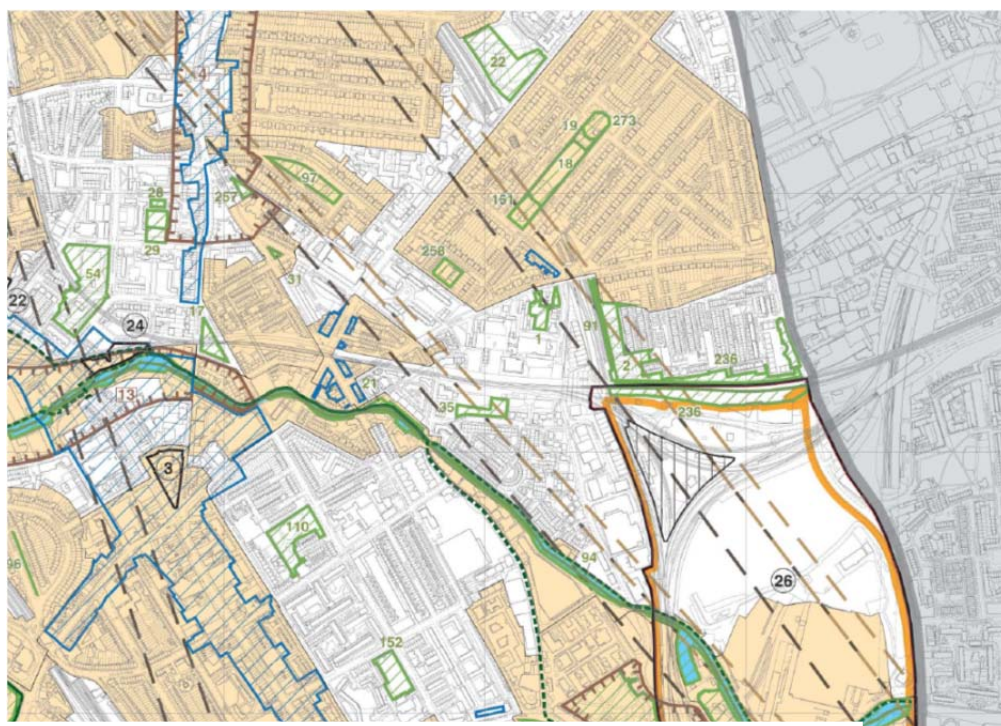


Figure 4.4: Extract from Camden Proposals Map (2010) source: Camden Council

¹ Parts of the site are also within a Slope Stability Constrained Area and the site is within the 200m safeguarding buffer zone for the High Speed 2 rail link

The Camden Core Strategy (2010)

- 4.58 Camden's Core Strategy sets out the key elements of the Council's planning vision and strategy for the Borough. Adopted in November 2010 it is central to the 'Local Development Framework' (LDF) and covers the plan period up to 2025. The overall vision for the Borough is that 'Camden will be a borough of opportunity'. The Core Strategy provides a number of strategic objectives that guide the delivery of the vision.
- 4.59 *Policy CS1 – Distribution of growth:* Sets out Camden's overall approach to growth and development. It states that growth to be focussed in the most suitable locations and managed to deliver benefits and opportunities whilst achieving sustainable development.
- 4.60 The Core Strategy states that development will be concentrated in the defined growth areas (Kings Cross, Euston and Tottenham Court Road, Holborn and West Hampstead Interchange) and appropriate development in other highly accessible locations. The strategy sets out the Council's objective that 12,250 additional homes will be provided in the Borough between 2010/11 and 2024/25.
- 4.61 CS1 also promotes the most efficient use of land and buildings by seeking development that makes full use of its site and resisting inefficient development proposals. In achieving this aim high density development and development that will increase the demand of travel is directed to accessible locations.
- 4.62 *Policy CS3 – Other highly accessible areas:* States that the Council will promote appropriate development in the highly accessible areas of; Central London; Euston; Tottenham Court Road; and the town centres of Camden Town, Finchley Road / Swiss Cottage, Kentish Town, Kilburn High Road and West Hampstead including appropriate edge of centre locations.
- 4.63 The written justification for this policy notes that these areas, and areas on the edge of these centres, are highly accessible by public transport and as such are generally suitable for a range of land uses and for higher density development.
- 4.64 *Policy CS4 – Areas of more limited change:* States that development in the areas of more limited change will respect the character of its surroundings, conserve heritage

and important features. Major development will be expected to bring benefits including improvements to walking routes, contributions to regeneration and training in deprived areas and the provision of open space and other community facilities.

- 4.65 Para 4.2 states 'whilst the Council does not envisage that large scale development will take place outside of the growth areas or highly accessible locations, the exception will be estate regeneration' which will be subject to consultation.
- 4.66 *Policy CS5 – Managing the impact of growth and development:* States that consideration will be given to providing uses that meet the needs of Camden's population and contribute to the Borough's London-wide role; providing infrastructure and facilities needed to support the population in the Borough; and providing sustainable buildings and spaces of the highest quality whilst protecting and enhancing the environment, heritage and amenity and quality of life of local communities.
- 4.67 In achieving this policy objective amenity will be protected by making sure the impact of development is considered; contributes towards strong and successful communities; and provides mitigation where necessary.
- 4.68 *Policy CS6 – Providing quality homes:* States that the Council will maximise the supply of additional housing to meet Camden's target of 5,950 homes (2007 -2017); maximise the supply of additional housing over the whole plan period 2010-2025 to meet or exceed the target of 8,925 homes; minimise the net loss of existing housing and; regard housing as priority land use in the LDF.
- 4.69 The Council will seek to secure high quality affordable housing by seeking to ensure that 50% of the borough-wide target for additional homes is provided as affordable housing.
- 4.70 In implementing this policy the Council will seek to negotiate the maximum reasonable amount of affordable housing under the specific circumstances of the site, including financial viability; apply an affordable housing target of 50% of the total addition to housing floorspace with a guideline of 60% social rented housing and 40% intermediate affordable housing; minimise the loss of affordable housing;

and regenerate Camden's housing estates and seek to bring the Council stock up to the Decent Home standard by 2012.

- 4.71 The Council will also seek a range of housing of different sizes, types and variety for both market and affordable housing sector with a priority to development that provides affordable housing and housing for vulnerable people.
- 4.72 *Policy CS10 – Supporting community facilities and services:* Seeks to ensure community facilities and services are provided for Camden's communities and people who work and visit the Borough. This includes a provision of new secondary school (Swiss Cottage), a new primary school in Kings Cross and a range of improvements to 16 schools and educational facilities across the Borough by 2014.
- 4.73 The policy also states that the Council will require development that increases the demand for community facilities to make appropriate contributions towards providing new or improving facilities. It will also support the retention and enhancement of existing community, leisure and cultural facilities and facilitate the efficient use of community facilities.
- 4.74 *Policy CS11 – Promoting sustainable and efficient travel:* Seeks to promote the delivery of transport infrastructure and availability of sustainable transport choices in order to support Camden's growth, reduce the environmental impact of travel and relieve the pressure on the transport network.
- 4.75 The policy aims to promote sustainable travel through walking, cycling and public transport use and making private transport more sustainable through expanding availability of car clubs and pool cars, minimise provision for private parking, restricting new public parking, promote use of low emission vehicles.
- 4.76 *Policy CS13 – Tackling climate change through promoting higher environmental standards:* Requires all development to minimise the effects of, and adapt to, climate change and encourage all development to meet the highest feasible environmental standards that are financially viable through efficient use of land and buildings, minimise the need to travel by car, minimise carbon emissions from redevelopment, construction and occupation of buildings by following the energy hierarchy.

- 4.77 *Policy CS14 – Promoting high quality places and conserving our heritage:* Seeks to ensure Camden’s buildings and places are attractive, safe and easy to use by requiring: development of the highest standard of design, preserving and enhancing Camden’s heritage assets and their settings (including conservation areas, listed buildings, archaeological remains, scheduled monuments and historic parks and gardens); promote high quality landscaping and works to streets and public places; seek the highest standards of access in all buildings and places to be accessible and inclusive; and protect important views of St Pauls Cathedral and the Palace of Westminster from sites inside and outside of the Borough.
- 4.78 *Policy CS15 – Protecting and improving our parks and open space and encouraging biodiversity:* States that the Council will protect and improve Camden’s parks and spaces, tackle deficiencies and under-provision and meet increased demand for open space including securing improvements to publicly accessible open land on the Council’s housing estates and securing other opportunities for additional public open space. The Council will also protect and improve sites of nature conservation and biodiversity through the designation of existing sites and improving opportunities to others and the provision of new sites.
- 4.79 *Policy CS16 – Improving Camden’s health and well-being:* Seeks to improve health and well-being in Camden. This will be through supporting NHS Camden in its goal to reduce health inequalities by targeting areas with the poorest health; protect existing and support the provision of new or improved health facilities, recognise and support the Boroughs concentration of centres of medical excellence and recognise the impact of poor air quality on health and implement Camden’s Air Quality Action Plan.
- 4.80 *Policy CS17 – Making Camden a safer place:* Seeks to make Camden a safer place through working with partners to tackle crime, fear of crime and anti-social behaviour, encourage appropriate security and community safety measures and require development to demonstrate how they have incorporated design principles which contribute to community safety and security, ensure businesses and organisations take responsibility for reducing the opportunities for crime, promote safer streets and public areas and address the impact of food, drink and entertainment particularly in Camden Town, Central London and other centres.

- 4.81 *Policy CS18 – Dealing with our waste and encouraging recycling:* Seeks to make Camden a low waste borough. The policy aims to reduce the amount of waste produced in the Borough and increase recycling and the re-use of materials to meet the target of 40% of household waste recycled by 2010 and 45% by 2015 and 50% by 2020. It also ensures developments include facilities for storage and collection of waste and recycling, deal with North London's waste by working with partner Boroughs and safeguard Camden's existing waste site at Regis Road.

Camden Development Policies (2010)

- 4.82 The Development Policies 2010 - 2025 support the Core Strategy by setting out detailed planning policies that the Council will use when making decisions on applications for planning permission.
- 4.83 *Policy DP1 – Mixed use development:* States the Council will require a mix of uses in development, where appropriate, including a contribution to the supply of housing.
- 4.84 *Policy DP2 – Making full use of Camden's capacity for housing:* Seeks to maximise the supply of additional homes by expecting the maximum appropriate contribution to supply of housing on sites that are underused and vacant, resisting alternative development of sites considered suitable for housing particularly for affordable housing. The Council will seek to minimise the loss of housing by protecting residential uses from development that would involve a net loss of residential floorspace.
- 4.85 *Policy DP3 – Contributions to the supply of affordable housing:* Seeks all residential developments with a capacity of 10 units or more additional dwellings to make a contribution to affordable housing. The affordable housing contribution will be expected to be made on site, where this cannot be achieved the Council may accept off-site affordable housing or a payment in lieu.
- 4.86 *Policy DP4 – Minimising the loss of affordable housing:* Resists development that would involve the net loss of affordable housing floorspace, including any affordable housing that takes the form of hostels, bedsits or other housing with shared facilities or an ancillary element of another use but only where development involves changing primary use or separating the housing floorspace from the primary use.

4.87 *Policy DP5 – Homes of different sizes:* Seeks to ensure all residential development contributes to meeting the priorities and expects a mix of large and small homes in residential developments. In considering the mix of dwelling sizes appropriate the Council will have regard to the different dwelling size priorities for social rented, intermediate affordable and market homes.

4.88 In implementing this policy the Council will take into account the character of the development, site and the area (including the impact of the mix on child density), site size and any constraints and the economics and financial viability of the site.

Dwelling Size Priorities Table					
	1-bedroom (or studio)	2-bedrooms	3-bedrooms	4-bedrooms or more	Aim
Social rented	lower	medium	high	very high	50% large
Intermediate affordable	medium	high	high	high	10% large
Market	lower	very high	medium	medium	40% 2-bed

Figure 4.5: Extract from Development Policies DPD (2010) source: Camden Council

4.89 *Policy DP6 – Lifetime Homes and Wheelchair Accessible Housing:* States that all new housing should meet the lifetime homes standards and that 10% of homes should either meet wheelchair housing standards or be easily adapted to meet them.

4.90 *Policy DP15 – Community and leisure uses:* Seeks to ensure development that results in additional need for community or leisure facilities contributes towards supporting existing facilities or providing new facilities. The policy also seeks to protect existing community and leisure facilities and will resist their loss unless it is replaced or it is no longer required in its current use.

4.91 *Policy DP16 – The transport implications of development:* Seeks to ensure that development is properly integrated with the transport network and is supported by adequate walking, cycling and transport links. Development will be resisted where movements to, from and within the site and transport capacity have not been addressed and appropriate mitigation provided.

- 4.92 *Policy DP17 – Walking, cycling and public transport:* Seeks development to make suitable provision for pedestrians, cyclists and public transport. The Council will seek to secure travel interchange facilities in locations that maximise travel benefits and minimise environmental harm. The Council will resist development that would be dependent on travel by private motor vehicles.
- 4.93 *Policy DP18 – Parking standards and limiting the availability of parking:* States all development should not exceed the maximum standards. Car free and capped developments will limit on site parking to disabled spaces, operational and servicing and designated spaces. Developments should also comply with the minimum standards for cycling.
- 4.94 *Policy DP19 – Managing the impact of parking:* Seeks to ensure that the creation of additional parking does not have a negative impact on parking, highways or the environment and will encourage the removal of surplus car parking spaces.
- 4.95 *Policy DP21 – Development connecting to the highway network:* Expects developments connecting to the highway network to ensure the use of the most appropriate roads by each form of transport and purpose of journey, avoid direct vehicular access to London Road Network and avoid the use of local roads. The Council will expect works affecting highways to avoid disruption and harm to the highway network and safety, on street parking, ensure adequate sightlines, address the needs of wheelchair users, contribute to high quality streets and repair any construction damage.
- 4.96 *Policy DP22 – Providing sustainable design and construction:* Requires development to incorporate sustainable design and construction measures and demonstrate how these principles have been incorporated into the design and proposed implementation. The Council also requires development to include appropriate climate change adaptation measures.
- 4.97 *Policy DP23 – Water:* Requires developments to reduce their water consumption, the pressure on the combined sewer network and the risk of flooding by: incorporating water efficient features and equipment and capturing retaining and reusing surface water and grey water; limiting the amount and rate of run-off and waste water and other sustainable urban drainage methods; and reducing the

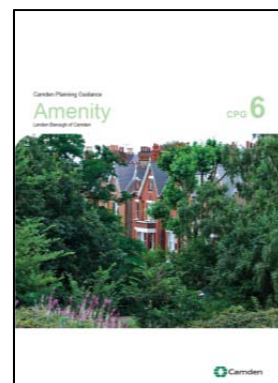
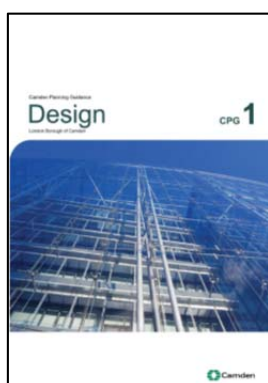
pressure placed on combined storm water and sewer network from foul and surface water.

- 4.98 *Policy DP24 – Securing high quality design:* Requires all development to be of the highest standard of design and identifies a number of criteria that need to be considered including; character, setting, context, form and scale of neighbouring buildings; quality of materials; provision of visually interesting frontages, appropriate location of building services equipment; existing natural features; provision of hard and soft landscaping; amenity space; and accessibility.
- 4.99 *Policy DP25 – Conserving Camden’s heritage:* seeks to maintain the character of conservation areas. The Council will take account of Conservation Area statements when assessing applications and only permit development that preserves and enhances the character and appearance of conservation areas.
- 4.100 *Policy DP26 – Managing the impact of development on occupiers and neighbours:* Seeks to protect the quality of life of occupiers and neighbours by only granting permission for development that does not harm amenity including: visual privacy; overlooking overshadowing and outlook; sunlight, daylight and artificial light levels; noise, odour etc.
- 4.101 *Policy DP28 – Noise and vibration:* Seeks to ensure that noise and vibration is controlled and managed. Planning permission will not be granted for development likely to generate noise pollution or development sensitive to noise in locations with noise pollution, or exceeding Camden’s noise and vibration thresholds. The Council will seek to minimise the impact on local amenity and will secure this through conditions and/or planning obligations.
- 4.102 *Policy DP29 – Improving access:* Seeks to promote fair access and remove the barriers that prevent people accessing facilities and opportunities by expecting all buildings to meet highest standard practicable of access and inclusion, require buildings and spaces for public to be designed as accessible as possible, expect facilities to be located in the most accessible parts, spaces between buildings and public transport to be accessible, secure car parking for disabled and secure accessible homes.

- 4.103 *Policy DP31 – Provision of, and improvements to, public open space and outdoor sports and recreation facilities:* States that the Council will only grant planning permission for development that is likely to lead to an increased use of public open space where an appropriate contribution to the supply of open space is made. Priority will be given to publicly accessible open space.
- 4.104 *Policy DP32 – Air quality and Camden’s Clear Zone:* Requires air quality assessments where development could potentially cause significant harm to air quality. Mitigation measurements will be expected in developments that are located in areas of poor air quality.

Supplementary Guidance and Best Practice

- 4.105 There are a range of supplementary and best practice guidance documents which are also relevant to the application proposals including:
- *Mayor of London ‘Housing SPG’ (2012)*
 - *Mayor of London ‘Draft Sustainable Design and Construction SPG’ (2013)*
 - *Mayor of London ‘Shaping Neighbourhoods: Play and Informal Recreation’ (2012)*
 - *Mayor of London ‘London View Management Framework’ (2012)*
 - *Mayor of London ‘Accessible London SPG’ (2004)*
 - *London Borough of Camden ‘CPG1 Design’ (2013)*
 - *London Borough of Camden ‘CPG2 Housing’ (2013)*
 - *London Borough of Camden ‘CPG3 Sustainability’ (2013)*
 - *London Borough of Camden ‘CPG6 Amenity’ (2013)*
 - *London Borough of Camden ‘CPG7 Transport’ (2013)*
 - *London Borough of Camden ‘CPG8 Planning Obligations’ (2013)*



5.0 PLANNING ASSESSMENT

- 5.1 In light of the redevelopment objectives of the project and in the context of the planning policy position outlined above, the following paragraphs consider the key issues associated with the application proposals.

A. General Principle of Development and Delivering Regeneration

- 5.2 The Agar Estate project forms part of Camden's 'Community Investment Programme' (CIP) which aims to generate investment, deliver new homes and regenerate neighbourhoods. The CIP is a 15 year plan and forms a central part of the Council's strategy which seeks to ensure that investment in schools, homes and community facilities can be realised despite wider economic circumstances.
- 5.3 The Council's CIP is closely linked to the Camden Plan and the delivery of new homes as part of the Agar Grove Estate project plays a key role in the achieving the Council's stated objectives for the long-term well-being of the community.
- 5.4 The Agar Grove Estate is home to a stable and cohesive community including many households who have lived on there for many years and are established in the area. However, despite being a popular place to live, the existing stock suffers from a number of problems ranging from physical defects to the size, type and quality of the housing stock relative to housing needs. Furthermore, the existing configuration of the Estate represents a highly inefficient use of land given its accessible and sustainable location.
- 5.5 The application proposals provide the opportunity to deliver high-quality new homes that will contribute towards the long-term sustainability of the community in a manner that fully accords with the wider strategic aims and objectives of the Council and is strongly supported by planning policy at all levels.
- 5.6 In considering the principle of development it is also helpful to consider the wider context of the area. Specifically, despite significant and on-going investment, parts of Camden still remain amongst the most deprived in London and the borough contains wide inequalities in household income, health and other characteristics. Indeed, Camden is one of the most polarised boroughs in London with some of the wealthiest areas in England as well as some of the most deprived.

- 5.7 Camden is a very popular place to live but as a consequence the average house price is the third highest in the capital and demand for affordable housing far outstrips supply and continues to rise. Camden has a small average household size compared to England and Wales and the number of single person households is growing amongst younger and older people. Despite this trend up to a third of Camden's households are overcrowded and so there is also a high demand for larger properties, particularly for social housing.
- 5.8 The Camden Plan is making important progress in tackling these problems and as the largest single housing project within the CIP programme to date the proposals for Agar Grove represent an important component of the Council's corporate strategy for delivering new homes and delivering regeneration for the community.
- 5.9 The project will deliver high-quality affordable homes with the type and configuration of accommodation tailored towards the needs of the existing residents. Furthermore, the proposals have been designed to enable a single decant so that community cohesion can be maintained, whilst the introduction of new intermediate and market housing will help to create a mixed and inclusive community and generate sufficient capital receipt to deliver the project.
- 5.10 Accordingly, the principle of re-developing the site to deliver much needed mixed-tenure housing in a sustainable manner is considered appropriate and the project's role within the Council's wider CIP should be afforded significant weight in the decision making process.

B. Provision of Housing

(i) Housing Needs and Making the Best Use of Land

- 5.11 In addition to addressing the specific needs of existing residents the project should also be considered in the context of the borough's wider housing needs and planning policy requirements. Specifically, the Core Strategy identifies the need to maximise the supply of additional housing to meet, or exceed, the target of 8,925 homes from 2010-2025, including a borough-wide target that 50% of new homes are provided as affordable housing.

- 5.12 The Council's most recent Annual Monitoring Report (AMR) (2012/13) states that the Council expects to meet its housing targets within the plan period as a whole. However, in light of wider economic conditions, the Council's 'Housing Strategy 2011-2016' identifies that housing delivery in recent years has dipped below the London Plan annual monitoring target of 665 homes which will place additional pressure on housing targets in the future.
- 5.13 Turning to affordable housing the need for additional units is chronic with the most recent assessment of housing need identifying that an additional 4,787 homes a year over a five year period would be required to meet current and newly arising need (*Housing Needs Survey Up-date 2008*).
- 5.14 It is clear that the Borough does not have the physical capacity to fully accommodate this level of need solely through new homes. However, from 2002 to 2011, just 1,435 new affordable units were developed in the borough which highlights the significant miss-match between demand and supply which is likely to come under increasing pressure due to wider economic circumstances and the significant reduction in Government funding for affordable housing.
- 5.15 Planning policy at all levels seeks to secure more sustainable patterns of development including through the more efficient use of brownfield land in accessible and sustainable locations.
- 5.16 Whilst not specifically identified for redevelopment in the Core Strategy there can be little doubt that the Agar Grove Estate represents a sustainable location to deliver new homes as demonstrated by the sites good access to public transport (PTAL 5-6), local shops, employment areas, open spaces and a range of social and community infrastructure.
- 5.17 Given its sustainable location it is incumbent on the project to make the most efficient use of the site given the requirements of Policy 3.4 of The London Plan which states that development should optimise housing output taking into account local context and character and transport accessibility.
- 5.18 Table 3.2 of The London Plan (as produced above) sets an appropriate density range for the site of 200-700 hr/ha or up to 260 u/ha depending on average unit sizes. It

is acknowledged that numerical density is a relatively crude measure of a scheme's acceptability (particularly from a physical design perspective); however, it does provide a useful indicator of housing output, and the Core Strategy states that the Council will expect new development in the borough to sit at the upper end of The London Plan density ranges.

- 5.19 As illustrated in Table 3 below the emerging proposals represent a density of 179 u/ha or 507 hr/ha which falls within the density ranges set out in The London Plan and demonstrates that, at a housing output level, the emerging proposals are making efficient use of the site in the context of sustainable development objectives.
- 5.20 Accordingly, the delivery of additional homes (including a significant proportion of affordable housing) represents a significant benefit of the proposals which will contribute towards meeting the Council's wider housing targets in a sustainable manner.

Table 3: Density by units and habitable rooms per hectare		
UNIT TYPE	PROPOSED UNITS	PROPOSED HAB ROOMS
Studio	21	21
One bed	191	382
Two bed	200	600
Three bed	56	224
Four bed	25	167
TOTAL	493	1,394
Density	179 u/ha	507 hr/ha

(ii) Affordable Housing

5.21 As set out in the policy section above the Council takes into account a range of factors when negotiating the quantum and type of affordable housing within individual proposals including: the character of the development, the site and the area; site size and constraints; the economics and financial viability of the development; and the impact on creation of mixed and inclusive communities.

5.22 As an estate regeneration project which forms part of the Council's 'Community Investment Programme' (CIP) the quantum and mix of affordable housing within the application proposals has been determined by the following factors as follows:

- (1) **Need to re-provide existing affordable housing:** This is a policy requirement and a fundamental principle of the scheme. Furthermore, the new affordable accommodation has to:
 - (i) meet current housing needs;
 - (II) meet the Council's aspirations for rent levels;
 - (III) meet current size standards (which represents a significant increase in floorspace); and;
 - (IV) be designed to enable a single de-cant for residents as far as possible.

These factors place a considerable financial, physical and logistical burden on the scheme above and beyond a "normal" development.

- (2) **Creating a mixed and balanced community:** The Agar Estate currently comprises predominantly affordable housing (circa 85%) and so has limited tenure diversity. The redevelopment provides the opportunity to create a more balanced split of affordable and market housing within an integrated development.
- (3) **Viability:** Whilst being promoted by the Council the project must be viable taking into account current economic conditions. Without a robust economic base the scheme cannot proceed.

5.23 The Agar Grove Estate currently comprises 249 units of which 212 are affordable². The application proposals will deliver a total of 493 new homes of which 253 are affordable which equates to 51.5% affordable provision on a unit basis or 56% on a habitable room basis with a mix of social rent and intermediate accommodation.

5.24 A detailed overview of the affordable housing component of the proposals is provided in the 'Affordable Housing Statement' which supports the application. As set out in the Statement it is considered that the current proposals are in accordance with the relevant policy considerations and will deliver:

- 253 high-quality new affordable homes which represents 52% of the total residential accommodation within the scheme on a floorspace basis or 56% on a habitable room basis;
- An increase in affordable housing floorspace of 56%;
- A mix of units which is designed to meet the housing needs of the existing residents and configured to enable a single de-cant wherever possible;
- The introduction of intermediate and market units to enhance tenure diversity and help cross-subsidize the new affordable homes; and
- 31% of the total up-lift of housing floorspace as affordable homes.

(iii) Dwelling Mix

5.25 Policy DP5 states that the Council will seek to secure a mix of large and small homes in residential developments taking into account the character of the development, site and the area along with other constraints including financial viability.

5.26 Given the decant requirements of the project the mix of dwellings within the socially rented element of the proposal has been determined by the housing needs of existing residents who will be re-housed as part of the redevelopment. Accordingly, whilst the mix falls short of the Council's policy aim of 50% large units, this is considered appropriate given the specific circumstances of the development and the brief requirements which are dictated by the Council's CIP.

² Two of the existing social rent units are being occupied as a single dwelling and are reported as a single unit for the purpose of the accommodation schedules set out in this report.

- 5.27 In addition to meeting the specific housing needs of the Estate, as illustrated in Table 4, the proposal responds positively to the Council's dwelling mix policy and will help contribute towards a mixed and inclusive community with a range of unit types and sizes.
- 5.28 It is acknowledged that the intermediate accommodation does not meet the Council's policy aim of 10% large units; however, this is a result of concerns over the 'affordability' of larger intermediate units and the overall viability of the project. Furthermore, the intermediate element of the scheme includes a significant proportion of 2 bed units which are identified as a 'high' priority in the Council's dwelling mix policy.
- 5.29 In terms of the market housing mix this has, to a degree, been dictated by the physical constraints of Lulworth House where the majority of the private units are located. Notwithstanding this constraint the proposal delivers a significant number of 2 bed units which is identified as a 'very high' priority in the Council's policy.

Table 4: Dwelling mix by tenure						
TENURE	Studio Unit / %	1bed Unit / %	2 bed Unit / %	3 bed Unit / %	4 bed Unit / %	TOTAL
Affordable	-	72 (33%)	79 (37%)	40 (19%)	25 (11%)	216
Intermediate	1 (3%)	21 (57%)	15 (40%)	-	-	37
Market	20 (8%)	98 (41%)	106 (44%)	16 (7%)	-	240
TOTAL	21 (4%)	191 (39%)	200 (41%)	56 (11%)	25 (5%)	493

(iv) Lifetime Homes and Wheelchair Housing

- 5.30 In accordance with policy the proposals are designed to achieve Lifetime Homes standards with the exception of the car-parking requirements which are not considered relevant given the car-free / capped nature of the development. In addition, there may be structural / physical constraints within the conversion of Lulworth House that will limit full compliance with Lifetime Homes although this will be explored further during the detailed design process.
- 5.31 10% of the units have been designed to wheelchair or wheelchair adaptable standards. Within the affordable element the units are designed to comply with the Camden 'Wheelchair Housing Design Brief' (2013), whilst the market units are

designed in accordance with the GLA best practice guidance 'Wheelchair Accessible Housing' (2007).

- 5.32 Within the market housing 10% of the units have been designed to full wheelchair adaptable standards from the outset. However, due to the decant requirements of the brief there is not sufficient demand within the affordable element of the scheme to identify 10% of the units as wheelchair housing at the planning stage.
- 5.33 Specifically, less than 10% of the households that will be re-housed within the replacement affordable units currently have a requirement for wheelchair housing and it has been agreed during pre-application discussions that the needs of existing residents shall take priority in the first instance with the balance of mobility units being made up during the latter phases subject to changes in housing needs.
- 5.34 Accordingly, three wheelchair units are provided in an early phase of the development to meet the specific requirements of current households on the Estate, whilst the 'additional' six socially rented units (provided beyond the current number of units on the Estate) will also be provided as wheelchair accommodation.
- 5.35 The provision of nine wheelchair units represents 3.6% of the affordable units in overall terms (including the intermediate housing) and so the layout and configuration of a number of units within a later phase of the scheme has been designed so that they can be altered prior to construction to full wheelchair standard in response to the housing needs of the Estate at that time.
- 5.36 This approach enables the project to address the current housing needs of the Estate (which is the overarching driver to the project), whilst retaining the capacity to meet the full 10% wheelchair units within the affordable element during the implementation of the development.
- 5.37 Further details of the adaptable units is provided in the Design and Access Statement.

(v) Open Space and Playspace

- 5.38 Camden's policies state that new development is expected to contribute towards open space, outdoor sport and recreation facilities with a requirement for 9sqm of public open space per residential occupier divided into: amenity open space; children's playspace; and natural green space.
- 5.39 Figure 5 and Appendix D of CPG6 set out the figures that will be used to assess the open space requirements for individual developments based on the occupancy rates recommended by the 'Camden Open Space, Sport and Recreation Study Update' (2008). Following on from this CPG6 states that there are three ways developments can contribute towards public open space: (1) on-site (this is required in areas of public open space deficiency); (2) off-site; and (3) a financial contribution in lieu of direct provision.
- 5.40 The application site is not located within an area of open space deficiency; however, there is an existing area of designated public open space within the Estate and, whilst this is not well used (or particularly legible as an area of public open space), it is considered important to make sure that appropriate open space provision is delivered within the scheme.
- 5.41 It is proposed to deliver the public open space requirements of the development on-site in a series of spaces for public and communal use including: green streets and spaces; communal gardens and a new central square which collectively will provide opportunities for movement, (integrated) play, recreation, bio-diversity and visual amenity.
- 5.42 The landscape and open space forms a key part of the masterplan for the site which not only provides an amenity for future occupiers of the development but will also enhance the provision of open space in the wider area and help to integrate the development into the wider area at a townscape and community level
- 5.43 As set out In Table 5 below the Agar Grove proposals generate a total open space requirement of 7,989sqm comprised of: 4,287sqm of amenity open space; 372sqm of play space; and 3,329sqm of green space.

- 5.44 As set out in the Design and Access Statement submitted as part of the application the proposals will deliver in excess of 8,000sqm of new open space, along with additional areas of natural green space at roof level and, as such, the proposals fully comply with the standards set out in the Council's guidance.
- 5.45 Policy 3.6 of the London Plan sets out the Mayor's policy with regard to children and young people's facilities which is further expanded in the SPG 'Providing for Children and Young People's Play and Informal Recreation' including setting out the space requirement for new development based upon anticipated levels of child yield.
- 5.46 Appendix CMA 2 provides a breakdown of the predicted child yield for the development along with the Mayor's total playspace requirement of 2,747sqm (based on 10sqm per child) which is then broken down into: under 5; 5 to 11; and 12+ area targets. As set out in the Design and Access Statement the application proposals provide a range of playspaces which are fully integrated into the wider masterplan and will provide opportunities for recreation and play in accordance with the Mayor and Camden's guidance.

Unit Type	Units	Amenity Open Space		Play Space		Green Space		Total	
		Per Unit	Total	Per Unit	Total	Per Unit	Total	Per Unit	Total
1 Bed	212	6.5	1378	0	0	5.2	1102.4	11.7	2480.4
2 bed	200	9.2	1840	0.6	120	7.2	1440	17	3400
3 bed	56	12.8	716.8	2.9	162.4	9.5	532	25.2	1411.2
4 bed	25	14.1	352.5	3.6	90	10.2	255	27.9	697.5
TOTAL	493		4,287		372		3,329		7,989

Table 5: Breakdown of open space requirements by unit type

C. Non-Residential Uses

(i) Retail Facilities

- 5.47 There is an existing local convenience store and a café along the Agar Grove frontage which provide an important amenity for residents of the Estate and the wider community. As part of the community consultation residents have expressed a strong desire for replacement facilities to be provided within the development which also accords with planning policy which seeks to secure a mix of uses in order to secure more sustainable patterns of development.
- 5.48 The application proposals include two new retail facilities (flexible A1 / A3 use) which have been strategically located along the Agar Grove frontage marking key entrances into the site and providing an active setting to new open space.
- 5.49 At 164sqm in total (split across two units) the quantum of retail space is comparable to the existing accommodation on site and is not considered to have a detrimental impact upon designated centres in the local area and will add to the sustainability of the wider neighbourhood.

(ii) Community Facilities

- 5.50 There is a small community room in the ground floor of Lulworth House of circa. 90 sqm; however, the space is not well used and provides limited value for existing residents of the Estate.
- 5.51 As part of the redevelopment a new 455sqm community space will be provided within the lower levels of Block B which will be suitable for a range of activities to support the residents of the development and the wider community. Due to the proposed phasing strategy the new community facility will be available before the existing room is de-commissioned and so there will be no short-term loss of accommodation during the construction phase.
- 5.52 The new facility has been designed as a modern, flexible space suitable for a range of activities and will act as a focal point for the community as well as contributing towards the provision of social / community infrastructure in the wider neighbourhood.

(iii) Business Floorspace

- 5.53 The application site is not located within a designated employment area and there are no existing employment facilities within the Estate; however, the Core Strategy encourages a mix of uses within large scale developments and recognises the benefit of creating local employment for the community.
- 5.54 The opportunity to deliver an element of business space at the lower levels of Block B was identified during the pre-application design process as a tool to animate the pedestrian and cycle link to Camley Street and provide a compatible use to the existing light-industrial activity to the east.
- 5.55 At 455sqm the proposed Class B1 space has the potential to support between 20-30 jobs and the space has been designed as modern, flexible accommodation that is particularly well-suited to the needs of small businesses which represents a large proportion of enterprise in the borough.

D. Design Issues

- 5.56 National Guidance places considerable emphasis on the importance of achieving high-quality design. The London Plan and Camden LDF also emphasise the need for high-quality design to ensure that new developments are in-keeping with established character and enhance the wider built environment.
- 5.57 In terms of design it is relevant to note that the brief for the project is to deliver an exemplary scheme in terms of its urban design and architectural quality which is reflected in the Council's decision to appoint Hawkins\Brown, MAE and Grant Associates who are each award winning practices with a proven track record of delivering the highest design quality.
- 5.58 The Design and Access Statement (DAS) submitted as part of the application provides a detailed description of the proposals and a comprehensive review of the design issues associated with the development.
- 5.59 As set out in the DAS the design approach has been based upon a rigorous process, contextual analysis and driven by the principles of good urban design. In particular,

the scheme is based on the concept of a 'streets and spaces' with building used to create positive spaces to move through, play and recreate in or just look at.

- 5.60 The design seeks to integrate the development into the local context particularly at the edges of the site which are stepped down to relate to existing neighbouring properties. However, as a corollary to this there is an opportunity to increase the scale of development in the south-east corner, adjacent to the less sensitive railway lines, in recognition that the site falls within a zone of transition from the lower rise development to the north and the higher, central scale of development to the south through Kings Cross towards central London.
- 5.61 The 'Townscape and Visual Impact' section of the Design and Access Statement provides a detailed analysis of the wider townscape implications of the proposal, including the effect the development will have on the character and appearance of the area and the protected viewing corridors from Parliament Hill and Kenwood towards St Paul's Cathedral.
- 5.62 This assessment, which includes a comprehensive suite of 'Accurate Visual Representations' (AVRs), concludes that the application proposals represent an appropriate townscape response for the site which will result in the creation of a high-quality development that will have a positive impact on the local environment.
- 5.63 Notwithstanding this assessment it is acknowledged that the Camden LDF takes a 'pre-cautionary' approach towards the development of new tall buildings in the borough and, accordingly, the following table provides an assessment of the application proposals when considered against the 'checklist' set out in the CABE / English Heritage 'Tall Buildings Guidance' (2007).

Table 6: Tall Buildings Checklist	
Criteria for evaluation	Application response
<p>The relationship to context, including natural topography, scale, height, urban grain, streetscape and built form, open spaces, rivers and waterways, important views, prospects and panoramas, and the effect on the skyline. Tall buildings should have a positive relationship with relevant topographical features and other tall buildings; the virtue of clusters when perceived from all directions should be considered in this light.</p>	<p>The application proposals have been developed in response to a detailed analysis of the site and local context taking into account the prevailing townscape and opportunities and constraints of the site.</p> <p>The scale and massing of the proposal seeks to integrate the development into the local context, particularly at the edge of the site where the scale is stepped down to relate to existing neighbouring properties. However, as a corollary to this there is an opportunity to increase the scale of development in the south-east corner, adjacent to the less sensitive railway lines, in recognition that the site falls within a zone of transition from the lower rise development to the north and the higher, central scale of development to the south through Kings Cross towards central London.</p> <p>As set out in the Design and Access Statement the siting of the proposed 18 storey Block B has been carefully considered in the context of key views (both from the conservation area and the protected viewing corridors); its relationship with the refurbished Lulworth House; and the wider townscape and is considered an appropriate location to deliver a taller building in the context of the wider regeneration objectives of the project.</p>
<p>The effect on the historic context, including the need to ensure that the proposal will preserve and/or enhance historic buildings, sites, landscapes and skylines. Tall building proposals must address their effect on the setting of, and views to and from historic buildings, sites</p>	<p>The application site is not located within a conservation area, nor are there any listed buildings within or immediately adjacent to the site. However, the wider setting of the project does include a number of heritage assets notably the Camden Square Conservation Area to the north.</p> <p>The relationship of the proposed 18 storey Block B and the extended Lulworth House on the Conservation Area(s) has been a key consideration in formulating the application</p>

<p>and landscapes over a wide area including: world heritage sites; scheduled ancient monuments; listed buildings; registered parks and gardens, and registered battlefields; archaeological remains; and conservation areas</p>	<p>proposals and a detailed visual impact assessment exercise was undertaken early in the design process to inform both the siting and scale of the proposed taller buildings within the scheme.</p> <p>The application site has a direct relationship with the Camden Square Conservation Area which sits immediately to the north of Agar Grove. However, as set out in the townscape and visual impact assessment in the Design and Access Statement, the street layout and urban grain of the conservation area results in limited visibility of the site from within the designated area, particularly from key views such as within Camden Square.</p> <p>The townscape assessment demonstrates that the proposed Block B and extended Lulworth House will have limited impact on the historic environment and that any increased scale of development at the site is mitigated by the significant improvement in the appearance of the Estate and wider townscape benefits of the proposals.</p>
<p>The effect on world heritage sites. The government has an international obligation to protect the outstanding universal value of world heritage sites as set out at the time of inscription in the statement of significance. Part of this obligation is the adoption of a management plan for each world heritage site by stakeholders, including if necessary a buffer zone or equivalent to protect the setting. The statement of significance and the</p>	<p>The application proposals will not have any direct impact upon world heritage sites.</p> <p>The Palace of Westminster is visible in the London Panorama's from both Kenwood and Parliament Hill; however, as demonstrated in the townscape assessment, the proposals will not have any impact on the views of the world heritage site.</p>

management plan are material considerations in the planning process. Regional and local planning documents for areas with world heritage sites should include policy on the protection of these sites.	
The relationship to transport infrastructure, aviation constraints, and, in particular, the capacity of public transport, the quality of links between transport and the site, and the feasibility of making improvements, where appropriate. Transport is important in relation to tall buildings because of the intensity of use, as well as density, that they represent.	<p>As set out in the Transport Assessment the application the site is extremely well served by public transport being within easy walking distance of Camden Road Station (London Overground) and Camden Town (Northern Line) along with numerous bus services which serve the local area.</p> <p>The site has a Public Transport Accessibility Level (PTAL) of 6a / 5 around the perimeter of the site demonstrating its accessibility and sustainability credentials.</p> <p>Accordingly, Agar Grove represents a sustainable location to deliver new homes as demonstrated by the sites good access to public transport (PTAL 5-6), local shops, employment areas, open spaces and a range of social and community infrastructure and the opportunities of increased density through the proposed taller buildings should therefore be supported.</p>
The architectural quality of the building including its scale, form, massing, proportion and silhouette, facing materials and relationship to other structures. The design of the top of a tall building will be of particular importance when	<p>In terms of design quality it is relevant to note that the brief for the project is to deliver an exemplary scheme which is reflected in the Council's decision to appoint Hawkins\Brown, MAE and Grant Associates who are each award winning practices with a proven track record of delivering the highest design quality.</p> <p>The proposals are considered to represent a high quality approach both in terms of the overarching urban design of</p>

considering the effect on the skyline. The design of the base of a tall building will also have a significant effect on the streetscape and near views.	the masterplan but also in terms of the architectural detailing which has been employed on the individual buildings.
<p>The sustainable design and construction of the proposal. For all forms of development, good design means sustainable design. Tall buildings should set exemplary standards in design because of their high profile and local impact. Proposals should therefore exceed the latest regulations and planning policies for minimising energy use and reducing carbon emissions over the lifetime of the development. The long-term resource and energy efficiency of tall buildings will be enhanced if their design can be adapted over time.</p>	<p>Environmental sustainability has played a key role in the design process with the objective of reducing the environmental footprint of the building as well as reducing long-term energy costs for residents.</p> <p>The new build proposals have been developed in accordance with 'Passivhaus' principles (for the new build elements) which is an energy performance standard that minimises heating costs through superinsulation, triple glazing and air-tight construction along with heat recovery of mechanically vented air.</p> <p>Passivhaus represents the ultimate design standard in terms of the 'be lean' aspect of energy policy with carbon emissions being primarily reduced by implementing passive energy efficiency to reduce the demand for energy rather than meet a larger demand with renewable energy sources.</p> <p>As the largest example of Passivhaus design in the UK to date the project has the potential to act as an exemplar in demonstrating how the objectives of climate change policy can be implemented in conjunction with fuel poverty objectives.</p>
<p>The credibility of the design, both technically and financially. Tall buildings are expensive to build, so it is important to be sure that the high standard of architectural quality required is not diluted</p>	<p>The application proposals have been formulated by a comprehensive design team including specialist technical advisors with expertise in the structural and environmental issues associated with delivering a taller building.</p> <p>The project has also been subject to detailed costing and</p>

<p>throughout the process of procurement, detailed design, and construction. Location, use, the commitment of the developer, and ability and expertise of the consultant team will have a fundamental bearing on the quality of the completed building.</p>	<p>viability assessment to ensure that the application proposals are robust and deliverable taking into account the wider econometrics of the project.</p> <p>As a 'Council's-own development' delivery has been an overarching consideration throughout the design process and the applicant has taken a robust approach towards ensuring that design quality is secured at the planning stage both through the selection of the design team and the level of design detail submitted with the application.</p> <p>The Council intends to act as the lead developer in implementing the proposals (with contractor / developer partner) which will further ensure that the design quality is secured through the implementation phase.</p>
<p>The contribution to public space and facilities, both internal and external, that the development will make in the area, including the provision of a mix of uses, especially on the ground floor of towers, and the inclusion of these areas as part of the public realm. The development should interact with and contribute positively to its surroundings at street level; it should contribute to safety, diversity, vitality, social engagement and 'sense of place'.</p>	<p>Whilst a residentially-led development the proposals include a range of facilities to support the community, including a local convenience shop, café and multi-purpose community facilities.</p> <p>Non-residential uses are provided at the base of both Block B and the refurbished Lulworth House as a means of grounding the buildings from a townscape perspective and integrating them into the surrounding public realm.</p> <p>The new community facilities have been deliberately located at the base of the proposed Block B where they will act as a focal point for both residents of the development and the wider community.</p>
<p>The effect on the local environment, including microclimate, overshadowing, night-time appearance,</p>	<p>The application proposals have been informed by detailed environmental considerations including overshadowing, daylight and micro-climate.</p>

vehicle movements and the environment and amenity of those in the vicinity of the building	As set out in the supporting documents the proposed Block B and refurbished Lulworth House will not give rise to any significant adverse environmental impacts. Indeed, the extension to Lulworth House combined with the landscape proposals will serve to ameliorate some of the micro-climate issues currently associated with the building thereby improving local environmental conditions.
The contribution made to the permeability of a site and the wider area; opportunities to offer improved accessibility, and, where appropriate, the opening up, or effective closure, of views to improve the legibility of the city and the wider townscape.	<p>The Agar Grove Estate currently lacks permeability as a result of its urban form and boundary treatment which limits access and severs the community from the wider townscape.</p> <p>The overriding design objective is to <i>stitch-in</i> with the local area and create a development that is a natural extension of the city not a stand-alone estate as currently exists. This is achieved through a masterplan based on “streets and squares” which connect back to the wider area and create meaningful opportunities for pedestrian (and cycle) movement across, through and within the site.</p> <p>The proposals will significantly increase the permeability of the site and the taller Lulworth House and Block B will act as landmarks to assist in the legibility of the local area, including marking the position of a new cycle / pedestrian route through the site.</p>
The provision of a well-designed environment , both internal and external, that contributes to the quality of life of those who use the buildings, including function, fitness for purpose and amenity.	<p>The overarching objective of the Agar Estate regeneration is to create new homes that meet the needs of the housing needs of the existing community within a high-quality environment that contributes towards a sustainable mixed and inclusive community.</p> <p>The community focus of the development has been a key driver in developing the application proposals which will deliver high-quality new accommodation in response to current needs and the most up to date design and space</p>

	<p>standards.</p> <p>The proposals will help to retain community cohesion through a single decant strategy, whilst also creating additional housing that will address wider needs.</p> <p>The proposals have been designed to meet and exceed the most challenging standards and brief objectives and has the potential to act as an exemplar for estate regeneration proposals.</p>
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E. Environmental Considerations

(i) Sunlight and Daylight

5.64 Policy DP26 of the LDF states that the Council will protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity taking into account *inter alia* sunlight and daylight. The policy states that the Council will take into account the guidance provided in BRE Guidelines 'Site Layout Planning for Daylight and Sunlight – A Good Practice Guide', whilst further guidance on the Council's approach is provided in CPG6.

5.65 The design process for the application proposals was supported by a detailed assessment of sunlight and daylight to ensure the development does not give rise to any unacceptable detrimental impact on the amenity of neighbouring properties, whilst also ensuring a good level of amenity for future occupiers.

5.66 As set out in the 'Sunlight and Daylight Report' by Anstey Horne and Co the scheme will not unduly compromise the amenity of neighbouring residential properties when assessed against the guidance set out in the BRE Guidelines despite being within a dense urban area where access to daylight and sunlight is constrained.

(ii) Flooding and Drainage

5.67 Whilst the site is located in Flood Zone One which is defined as being outside the floodplain and / or an area liable to flood risk (less than 1 in 1000 years) a 'Flood Risk

and Drainage Report' is submitted as part of the application and considers the wider hydrological implications of the project.

5.68 As noted in the Report the Strategic Flood Risk Assessment (SFRA) for North London identifies that the site is located outside an area at risk from tidal or fluvial flooding and that there have been no recorded incidents of flooding at or within proximity of the application site. In addition the site is not located within an area at risk from overland, ground water and sewer flooding.

5.69 In terms of drainage the Report details the Surface Water Drainage Strategy for the development which includes measures to restrict discharge through on-site attenuation including the incorporation of Sustainable Urban Drainage Systems (SuDS) in the form of: permeable paving; rain gardens; bio-retention areas; swales; rainwater recycling; and green roofs.

5.70 As set out in the Report the proposed surface water and drainage strategy has been reviewed by the Environment Agency Planning Team who have welcomed the inclusion of the SuDS measures.

(iii) Ground Conditions and Contamination

5.71 Given the predominantly residential use of the Estate and wider area the site is not considered to be at risk from ground contamination; however, a 'Phase 1 Ground Condition Assessment' is submitted as part of the application to identify any potential geo-environmental or geological hazards and constraints to the proposed development.

5.72 The Assessment has been carried out in accordance with British Standard 10175 (2001); Contaminated Land Report 11 (EA, 2004) and NHBC Standards (NHBC, 2011) as well as the guidelines outlined in CPG6.

5.73 The Assessment concludes that the potential risk to sensitive receptors is "Very Low" (with the exception of construction works where the risk is "Low") and that potential contaminants and hazardous ground gases do not represent an unacceptable risk to

human health, controlled waters or ecology and wildlife associated with the proposed development.

- 5.74 Accordingly, the site is not designated as Contaminated Land under Part 11a of the Environmental Protection Act 1990 and the ground conditions of the site do not represent a barrier to the proposed redevelopment.

(iv) Noise and Vibration

- 5.75 A 'Noise and Vibration Assessment' is submitted as part of the application and considers the impact of the adjoining road and railway upon the amenity of future occupiers of the development in accordance with Policy DP28 of the LDF.

- 5.76 The Assessment is based upon noise and vibration surveys undertaken at the site which have been used to create a noise model for the site so the existing noise climate can be compared with the limits set out in DP28. In addition, the Assessment includes details of future noise levels taking into account predicted growth in rail and road traffic.

- 5.77 The Assessment demonstrates that the noise and external vibration levels fall within the limits set out in the Council's policies for where planning permission will not be granted. Following on from this the report sets out details of the proposed glazing strategy to ensure that internal noise levels within the proposed units all meet the British Standard BS8233 and will result in a good standard of residential amenity.

(v) Air Quality

- 5.78 An 'Air Quality Assessment' is submitted in support of the application and considers the air-quality impacts associated with the construction and operation of the proposed development.

- 5.79 The Assessment concludes that, whilst construction traffic is unlikely to significantly affect air quality within the surrounding area, the construction works have the potential to create dust and will require a package of mitigation measures to minimise the risk of elevated PM₁₀ concentrations and dust nuisance. In terms of future occupiers the Assessment concludes that concentrations of nitrogen dioxide

and PM₁₀ are below the relevant policy objectives and are acceptable for residents of the development.

(vi) Wind and microclimate

5.80 As part of the design process wind modelling has been undertaken to help the design team understand the impact of the proposed development on the local micro-climate as well as assisting in the design of the external amenity areas in the scheme.

5.81 The 'Wind Micro-Climate Assessment' submitted as part of the application notes that the proposal is unlikely to bring about unacceptable wind corridors given the low to medium-rise nature of the proposed buildings. However, the Assessment notes that existing residents have complained that wind conditions around the base of Lulworth House are unacceptable on occasions and that the proposed taller buildings in the south-west quadrant of the site have the potential to create uncomfortable wind conditions.

5.82 In response the Assessment provides a series of recommendations which have been included in the application proposals including:

- Additional tree planting between Lulworth Tower and the Children's Centre, extending around / beyond the southeast corner of the tower to offer additional sheltering to Lulworth Gardens East
- Additional tree planting or a canopy along the eastern façade of Block B
- Screening for corner balconies within Block B
- Screening for the terrace proposed for the northern façade of Block B
- Screening and a canopy for the terrace proposed for the eastern façade of Block B

5.83 With the proposed mitigation in place the Assessment concludes that for the majority of the site and surrounding area wind conditions are likely to remain acceptable or be improved relative to the existing situation although the report recommends the use of a wind tunnel study at the detailed design stage to help inform the balcony and terrace screening.

(vii) Trees and Ecology

- 5.84 An 'Extended Phase 1 Habitat Survey' of the site undertaken in May 2013 by MKA Ecology is submitted as part of the application documents and provides an overview of the existing ecological value of the site.
- 5.85 The Survey concluded that, in general, the site is considered to be of 'low ecological value'; however, some features with the potential to support protected species were identified along with habitat for nesting birds.
- 5.86 In response the Survey identifies a number of bio-diversity enhancements which have been included in the application proposals including: bird and bat boxes; incorporation of native plant species; and the provision of living roofs. An 'Ecological Management Plan' has been developed for the project to ensure that these habitats and features are managed in a way that will maximise their contribution to local diversity.
- 5.87 In light of these measures the application proposals will enhance the bio-diversity and ecological values of the site in accordance with Policy 7.19 of the London Plan, Policy DP22 of the LDF and the guidance set out in CPG6.

F. Sustainability and Climate Change

- 5.88 The application includes a 'Sustainability and Energy Assessment' by Max Fordham which reviews the sustainability aspects of the proposal in the context of adopted planning policy and best practice guidance.
- 5.89 It is relevant to note that Max Fordham were appointed at the outset of the design process and have formed an integral part of the design team throughout the design evolution process. Indeed, the decision to appoint Max Fordham – one of the country's foremost sustainable engineering practices – show a clear commitment to placing environmental considerations at the heart of the development and is reflected in the application proposals being put forward.
- 5.90 In addition to addressing sustainability policy a key aspect of the design brief for the project is tackling issues associated with fuel poverty and developing a strategy that

will provide long-term benefits for residents in terms of both environmental performance and in-use considerations.

- 5.91 At an early stage in the design process the Council (as applicant) opted to develop the scheme in accordance with 'Passivhaus' principles (for the new build elements) which is an energy performance standard that minimises heating costs through superinsulation, triple glazing and air-tight construction along with heat recovery of mechanically vented air.
- 5.92 Passivhaus represents the ultimate design standard in terms of the 'be lean' aspect of energy policy with carbon emissions being primarily reduced by implementing passive energy efficiency to reduce the demand for energy rather than meet a larger demand with renewable energy sources.
- 5.93 The refurbishment of Lulworth House also achieves high environmental standards using the BREEAM residential refurbishment assessment tool.
- 5.94 As set out in the accompanying report the scheme has been designed in direct response to the guidance set out in The London Plan and the GLA 'Sustainable Design and Construction Supplementary Guidance' and includes measures to:
- Re-use brownfield land
 - Conserve energy, materials, water and other waste
 - Ensure the designs make the most of natural systems both within and around the buildings
 - Reduce the impacts of noise, pollution, flooding and micro-climate effects
 - Ensure developments are comfortable and safe for users
 - Conserve and enhance the natural environment particularly in relation to bio-diversity
 - Promote sustainable waste behaviour
- 5.95 In terms of energy the proposals have been designed in response to the Mayor's 'Energy Hierarchy' as follows:

Use Energy Efficient – ‘Be Lean’

The design of each building on site adopts a number of ‘passive’ design measures which respond to the specific condition of each plot. Measures includes: high thermal performance through increased insulation and triple glazing; careful detailing to avoid thermal bridging; air-tight construction; measures to reduce summertime overheating; large windows to maximise daylight; heat recovery ventilation systems; water saving measures; low energy lighting and A-rated appliances; block by block plant rooms to allow simple low pressure and low temperature systems; and timed and zone temperature-controlled heating.

Supply energy efficiently – ‘Be Clean’

A detailed assessment has demonstrated that a Combined Heat and Power Units (CHP) would not be appropriate for the project given the relative heat and energy loads of a predominantly residential development. However, a highly efficient block-by-block communal heating system is provided within the development which has been designed to enable future connectivity to a wider neighbourhood system.

Use renewable energy – ‘Be Green’

An installation of photovoltaic and solar thermal panels is proposed at roof level to provide a further reduction in CO2 emissions through renewable energy sources. The quantum and distribution of the panels having been developed in the context of other considerations including roof-top amenity, bio-diversity and other plant requirements.

- 5.96 In summary, the development will provide an overall reduction in CO2 emissions of 32% which, whilst marginally below the London Plan target of 40%, represents the maximum reasonable reduction for the project when taking into account the physical constraints of the projects and the wider benefits of Passivhaus which are not fully measured by the energy hierarchy.
- 5.97 It is clear that the Agar Grove proposals represent a highly sustainable form of development and that wider environmental considerations have played a key role in informing the design to ensure that maximum benefit can be achieved through

passive design features as well as the incorporation of on-site energy reduction and generation technologies.

- 5.98 Furthermore, as the largest example of Passivhaus design in the UK to date the project has the potential to act as an exemplar in demonstrating how the objectives of climate change policy can be implemented in conjunction with fuel poverty objectives.

G. Transportation

- 5.99 The overarching aim of planning policy at all levels is to promote more sustainable patterns of development including by locating uses in areas which are accessible by public transport, cycling and walking in order to reduce the need to travel by private car.
- 5.100 A 'Transport Assessment' (TA) by PBA is submitted as part of the application and considers the wider transport implications of the project, including impact on the highways network, public transport and pedestrian environment.
- 5.101 As set out in the TA the site is very well served by public transport which is reflected in the site's high PTAL. In addition, pedestrian and cycle facilities in the area are good (and will be improved as part of the development) such that residents of the development will be easily able to access a range of shops, jobs and amenities in the local area.
- 5.102 In order to encourage more sustainable forms of travel minimal car-parking is provided within the proposals with spaces only being made available to disabled residents and existing residents who currently hold a car-parking permit. All other units within the development will be 'car-free' and residents will be prevented from applying for on-street or residents parking permits as a condition of their tenancy, lease or freehold.
- 5.103 The TA concludes that, given the accessible nature of the site combined with the 'car-free / car-capped' nature of the scheme, the development will not give rise to any material impact upon the highways network as residents will have easy access to a range of non-car based forms of travel.

5.104 In order to ensure the long-term locational advantages of the site are maximised the application is accompanied by a draft 'Green Travel Plan' which sets out a number of measures to promote sustainable travel that will ensure long-term opportunities are maximised.

5.105 It is clear that the the application proposals have been designed in response to the objectives of securing more sustainable patterns of development by provided new homes in an accessible location which will encourage the use of public transport, walking and cycling and reduce reliance on private car based forms of travel.

H. Section 106 Matters and CIL

5.106 The Agar Grove project is a 'Council's-own development' and so matters that would normally be secured as part of a section 106 planning obligation will be secured via planning condition. As a corollary to this a 'shadow section 106 agreement' will be prepared as part of the decision making process to ensure that these provisions are secured as a planning obligation in the event the site is disposed of by the Council in the future.

5.107 A Planning Obligations Statement is supported as part of the application which provides an overview of the heads of terms put forward in support of the proposals which have been discussed with the local planning authority at the pre-application stage which include:

- (1) Provision of Affordable Housing
- (2) Details of Phasing / Delivery of Housing
- (3) Local Procurement, Recruitment and Apprenticeships
- (4) Education Provision
- (5) Community Facilities
- (6) Amenity and Public Open Space
- (7) Energy and Climate Change Measures
- (8) Car-Free Development
- (9) Transport and Highways
- (10) Construction Management

6.0 SUMMARY AND CONCLUSIONS

- 6.1 This Planning Statement has been prepared by CMA Planning on behalf of Camden's 'Housing and Adult Social Care' (HASC) Department ("the applicant") in support of a planning application for the regeneration of the Agar Grove Estate within the London Borough of Camden.
- 6.2 The Agar Grove project forms part of Camden's 'Community Investment Programme' (CIP) which aims to generate investment, deliver new homes and regenerate neighbourhoods. The CIP is a 15 year plan and forms a central part of the Council's strategy which seeks to ensure investment in schools, homes and community infrastructure can be realised despite wider economic circumstances.
- 6.3 Agar Grove Estate was constructed by the London Borough of Camden in the 1960s and comprises some 249 units, of which 210 are let to Council tenants with 36 owned by leaseholders and 3 by freeholders. The Estate consists of a series of low / medium rise blocks and an 18 storey tower (Lulworth House).
- 6.4 The Estate is home to a stable and cohesive community including many householders who have lived there for a number of years and are established in the area. However, despite being a popular place to live, the existing stock suffers from a number of problems ranging from physical defects to the size, type and quality of the accommodation relative to housing needs. Furthermore, the existing configuration of the Estate represents an inefficient use of land given its accessible and sustainable location.
- 6.5 The project has been the subject of extensive consultation with existing residents and the application proposals have been developed in response to the views of the community and other key stakeholders. This consultation has helped to establish the overarching brief for the project which comprises:
- Demolition of the existing low-rise blocks and comprehensive refurbishment / extension of Lulworth House
 - Creation of new homes to re-house existing Camden tenants in response to their current housing needs and to current design / space standards, including a single decant for the majority of tenants

- Creation of additional new homes including private, shared-ownership and social rent to foster a mixed and inclusive community
- Replacement community and retail facilities and creation of new small scale business space
- Appropriate open and amenity space to support the development and contribute towards the creation of a high-quality environment

6.6 The application proposals have been sensitively designed in response to a detailed analysis of the site and local context taking into account the character of the area and the applicant's objective of delivering a high-quality development.

6.7 The proposals represent a significant opportunity for the Agar Grove Estate and the wider community to secure much needed new housing as part of a high-quality and sustainable mixed-tenure development that will contribute towards a number of the Council's wider regeneration objectives.

6.8 For the reasons set out in this report the application proposals are considered to accord with The London Plan, the Camden LDF and the latest national guidance in respect of delivering sustainable development. Accordingly, we consider that the scheme is acceptable in planning terms and should be supported by the local planning authority.

APPENDICES

Appendix One: Existing Areas and Methodology

Given the occupied nature of the Estate it has not been possible to undertake a full internal measured survey of the existing accommodation.

During the pre-application stage an estimate of existing areas was generated from the gross external area of each building with an apportionment to tenure and unit type on a percentage basis derived from housing needs survey information. However, this approach is limited and does not provide an accurate means of comparing the existing and proposed accommodation in response to policy considerations.

In order to provide a more robust assessment of existing housing a unit-by-unit accommodation schedule has been compiled using a combination of information from the housing needs survey and internal surveys of typical unit types to generate the existing accommodation schedule as set out in the table below.

NUMBER OF BEDS	EXISTING ACCOMMODATION								
	SOCIAL RENT			INTERMEDIATE			MARKET		
	Units	M2 (NIA)	Hab	Units	M2 (NIA)	Hab	Units	M2 (NIA)	Hab
Studio	16	448	16	0	0	0	1	28	1
1 bed	28	1303	56	0	0	0	7	344	14
2 bed	97	5665	291	0	0	0	3	177	9
3 bed	54	3535	216	2	130	8	22	1450	88
4 bed	14	1070	70	0	0	0	4	310	20
other	1	130	8						
TOTAL	210	12151	657	2	130	8	37	2309	132

TENURE	EXISTING UNITS	EXISTING HAB ROOMS	EXISTING FLOORSPACE (SQM) (NIA)
Social rent	210 (84%)	657	12,151 (83%)
Intermediate	2 (1%)	8	130 (%1)
Market	37 (15%)	132	2,309(16%)
TOTAL	249	797	14,590

Appendix Two: Child yield Calculation and GLA Playspace Calculation

Assessing child occupancy and play space requirements

Size of your development:

Number of FLATS

	Studio	1 bed	2 bed	3 bed	4 bed	5 bed	Total
Social rented/affordable		72	79	40	25		216
Intermediate	1	21	15	0	0		37
Market	20	98	106	16	0		240
Total	21	191	200	56	25	0	493

Number of HOUSES

		1 bed	2 bed	3 bed	4 bed	5 bed	Total
Social rented/affordable		0	0	0			0
Intermediate		0	0	0	0		0
Market	0	0	0	0	0		0
Total		0	0	0	0	0	0

Proportion of children

	Number of children	%
Under 5	112	41%
5 to 11	94	34%
12+	69	25%
Total	275	100%

Play space requirements

GLA benchmark (sqm)*	Alternative local benchmark (sqm)**	Total (sq m play space) required
10		2747.2
	0	0.0

* GLA benchmark standard=minimum of 10sqm of dedicated play space per child

** Borough's local benchmark