

should either meet wheelchair housing standards, or be capable of being them (Policy DP5, Camden Development Policies DPD, 2010).

Employment

5.38 Policy DP13 of Camden Development Policies DPD (2010) states that the LPA will usually retain land and buildings that are suitable for continued business use and will resist a change to non-business. Where premises or sites are suitable for continued business use, the LPA will consider redevelopment proposals for mixed use schemes provided that:

- 'the level of employment floorspace is maintained or increased;
- they include other priority uses, such as housing and affordable housing;
- premises suitable for new, small or medium enterprises are provided;
- floorspace suitable for either light industrial, industry or warehousing uses is re-provided where the site has been used for these uses or for offices in premises that are suitable for other business uses;
- The proposed non-employment uses will not prejudice continued industrial use in the surrounding area'.

Design

5.39 As set out in Policy DP22 of the Camden Development Policies DPD (2010) the LPA requires development to incorporate sustainable design and construction measures. Schemes must demonstrate how sustainable development measures have been incorporated into the design and proposed implementation. Schemes must also incorporate green or brown roofs and walls where suitable. Through this policy the LPA expects new build housing to meet Code for Sustainable Homes Level 4 by 2013.

5.40 Policy DP23 requires developments to reduce their water consumption, the pressure on the combined sewer network and the risk of flooding. Water efficient features should be incorporated into the design. Run-off and waste water entering the combined storm water and sewer network should be limited. The provision of attractive and efficient water features are encouraged.

- 5.41 All developments are to be of the highest standard of design. DP24 specifies that developments should consider:
- 'a) character, setting, context and the form and scale of neighbouring buildings;
 - b) the character and proportions of the existing building, where alterations and extensions are proposed;
 - c) the quality of materials to be used;
 - d) the provision of visually interesting frontages at street level;
 - e) the appropriate location for building services equipment;
 - f) existing natural features, such as topography and trees;
 - g) the provision of appropriate hard and soft landscaping including boundary treatments;
 - h) the provision of appropriate amenity space; and
 - i) accessibility.'
- 5.42 Policy DP25 of Camden Development Policies DPD (2010) aims to preserve or enhance the borough's listed buildings. The LPA will 'not permit development that it considers would cause harm to the setting of a listed building'.

Parking Standards

- 5.43 Appendix 2 of Camden Development Policies DPD (2010) outlines parking standards for C3 Residential Development. Residential units are required to provide 1 car parking space per unit, and 1 storage or parking cycle space per unit. Wheelchair housing standards require 1 space per dwelling, with dimensions suitable for use by people with disabilities. B1 units parking standards require a maximum of 1 car parking space per 1000 sqm and 1 cycle space per 250sqm.

Draft Site Allocation DPD

- 5.44 The DHO site has been allocated as part of a wider site (Site 42) of the Submission Draft Site Allocations DPD. This document has been submitted to the Secretary of State and the examination of the document is expected to be held in early January 2013. The site allocation guidance suggests that the wider site, of which the DHO site is part, could be used to provide a mix of uses including renewed community facilities along with new community facilities, housing (including affordable

housing) and other complementary uses, such as employment. Development will be expected to *'Support and complement wider area regeneration objectives'* (Page 158).

5.45 The Site Allocations DPD also states that development should:

- *'Enhance existing community facilities and explore opportunities for additional community facilities to contribute towards improved provision in the area.*
- *Make more efficient use of the sites to assist investment in existing housing and enable the provision of new housing and affordable housing.*
- *Seek to retain an element of flexible employment floorspace on site or suitable replacement floorspace on alternative sites*
- *Contribute to an improved environment and wider regeneration aims within the area*
- *Contribute to improved public realm, pedestrian environment and accessibility to and around any new development*
- *Contribute positively towards community safety*
- *Offer job and training opportunities for local residents, particularly through apprenticeships and training in construction*
- *Safeguard the setting of nearby listed buildings*
- *Fully explore the potential to link into the Royal Free Hospital heating network*
- *Consider the setting of Hampstead Heath and associated views.'* (Page 158)

6 PLANNING ISSUES AND ANALYSIS

a) Introduction

- 6.1 This section explains, how in the context of Section 38 (6) of the Planning and Compulsory Purchase Act, the proposals accord with the statutory Development Plan, which comprises the Camden Core Strategy (2010), Camden Development Policies DPD (2010) and the London Plan (2011). In accordance with the NPPF, such proposals should be approved ‘without delay’.

b) Principle of Development

- 6.2 The BLR site is in need of redevelopment. As noted in the Cabinet Report of 12 September 2012, the blocks have flat roofs and homes on the upper level have large patios, both of which are prone to leak in wet weather. The properties at the ends of the blocks are particularly susceptible to damp and mould growth on the ceilings and walls and are the most expensive to heat. The scope of necessary repair work is “significantly wider than most ‘Better Homes’ projects” (paragraph 3.2).
- 6.3 The Cabinet Report also highlights ‘persistent anti-social behaviour adversely affecting residents’ quality of life. Residents expressed view is that another round of repair/refurbishment works would not resolve issues that they feel relate to the fundamental design and construction of the estate (paragraph 3.3).’
- 6.4 The existing dwellings are not considered to be of any architectural merit. In this regard the buildings are not identified as making a positive contribution to the character and appearance of the area and therefore demolition would be acceptable, subject to a suitable replacement.
- 6.5 This proposal provides the opportunity to deliver sustainable regeneration through mixed tenure housing, a strategy for replacement employment floorspace and new public, communal and private open space and public realm improvements.
- 6.6 The Bacton Low Rise Estate is a committed redevelopment proposal in Camden Council’s Community Investment Programme, is included as a deliverable housing site in Camden’s five year housing supply and the DHO part of the site has been subject to public consultation through the Site Allocation DPD.

6.7 The redevelopment of the site for the mix of uses proposed is therefore acceptable in principle.

c) Provision of Housing

6.8 The Core Strategy (2010) sets out the LPA's overall housing target as 8,925 homes for the plan period 2007-2025. Demand for housing exceeds supply in Camden with an estimated growth of approximately 1,000 households per year until 2026. The Annual Monitoring Report (2011) estimates that around 6,000 households live in unsuitable accommodation.

6.9 More specifically, the LPA have identified a five year land supply for the period 2012/13-2016/17 equating to approximately 5,612 homes for the five year period, equating to 1,122 per annum (AMR, 2011). The DHO proposal site is included as a deliverable housing site in Camden's five year housing supply.

6.10 The proposal will contribute towards the Borough's need for both family and affordable homes in a suitable location. Not only are all 87 existing social rented units being replaced; 27 additional affordable housing units are proposed (see Table 1 in Section 4 above).

6.11 Policy CS6 of the Core Strategy (2010) seeks an affordable housing target of 50% of the total addition to housing floorspace, and includes the guidelines that 60% of this should be social rented housing and 40% be intermediate affordable housing. The applicants have balanced the viability of the scheme with housing need and the planning policy requirements, and have settled on the provision of the following quantum of affordable housing through formal pre-application meetings with the LPA.

6.12 The application proposes 114 affordable units, which equates to 46.8% of total proposed residential floorspace in the scheme, which the LPA have indicated to be an acceptable overall proportion, on the basis that the site is delivering the maximum reasonable amount of affordable housing, in accordance with the London Plan (see Table 2 in Section 8 below). Of the net additional affordable housing, 17 (63.0%) of the 27 units are proposed to be social rented housing and 10 (37.0%) are proposed as intermediate affordable housing. This policy-compliant split has been derived taking into account local need and the character of the development, which is Council-led.

- 6.13 The application proposals are in accordance with the explanatory text relating to Policy DP4, since the affordable housing floorspace is to be re-provided in full and on-site.
- 6.14 The mix of housing units is acceptable in planning terms. Policy DP5 of Camden Development Policies DPD (2010) expects a mix of large (3+bed) and small (1-2 bed) homes in all applications, which is the case in this scheme. The LPA encourages 50% of social rented units to be 3 bedrooms and above; the scheme delivers 42.3% as large units, with 10.6% of these units as very large units (i.e. 4 bedrooms or more), for which there is a 'very high demand'. The LPA encourages 10% of intermediate units to be 3 bedrooms and above; the scheme delivers 100% as 3 bed units. This is because there is an acknowledged demand for larger family units in the intermediate tenure, and this proportion has been discussed and agreed with LPA planning officers. The LPA encourages 40% of market units to be 2 bedrooms; the scheme delivers 43.2% as 2 bedroom units.
- 6.15 In addition, a variety of townhouses, maisonettes and flats are provided to ensure a range of property typologies are provided to potential occupiers, as well as a scheme that presents a varied urban form.
- 6.16 Section 8 sets out the approach to affordable housing provision in more detail.

d) Provision of Replacement Employment Floorspace

- 6.17 Policy DP13 of Camden Development Policies DPD (2010) resists the loss of employment uses. As the existing employment workspaces at 2-16 Vicars Road (970sqm GEA / 922sqm GIA / 731.1sqm NIA) are to be redeveloped as part of the first phase of proposals and are required to provide sufficient decant opportunities for existing residents on the BLR site, the applicant proposes to re-provide employment workspace elsewhere within the development site as well as refurbishing and bringing back into use off-site employment workspace at near-by Burmarsh Workshops, located at Marsden Street, to the south of the application site.
- 6.18 In so doing, the level of employment floorspace in use will increase overall; the application site will deliver high levels of other priority land uses; and a range of employment unit types and sizes will be provided for small and medium enterprises, for a full range of B1 uses, including light industrial use.

- 6.19 The applicants propose on-site workspace units on the corner of Haverstock Road, to a total of 285sqm GEA / 253.3sqm GIA. Units will be provided in a shell and core format to allow flexibility for tenant-specific fit out of the space, and each unit will be provided with individual WC and kitchenette facilities to increase their attractiveness to occupiers and to improve the range of businesses that may occupy them. The units are single storey, will have clear high ceilings, will have lots of natural light and will have access for delivery and servicing all of which are attributes of Category 1 and Category 2 premises (as set out in Camden Planning Guidance (CPG) 5, page 45). The existing units are also broadly Category 2 premises, however, they do not fulfil all the attributes of Category 2 (i.e. not all units have level access, half the units are on upper floors, and there is no goods lift access). While it is not possible to fully provide all the features of Category 2 units in the replacement on-site floorspace, because the units are being provided on the ground floor of a residential block, CPG5 makes clear that Category 2 units have a selection of the specified characteristics, rather than meeting all of them (paragraph 6.11). The current employment floorspace accommodates a range of businesses, including office space, light industry, some small scale manufacture and storage. The proposed replacement on-site floorspace can accommodate a similar range of businesses, the scope of which would be expected to fall within the B1 Use Class, and would therefore be considered suitable in an urban context with neighbouring residential uses.
- 6.20 It is also proposed to refurbish and upgrade 2,840sqm (GIA) of employment floorspace at Burmarsh Workshops. This accommodation currently comprises 16 light industrial workshops converted from a former underground car park on the St Silas Estate on Marsden Street, off Grafton Road, to the south of the application site. The accommodation is at lower ground floor level, with ramped access and security gates for pedestrians and vehicles, and units are arranged off a central, very wide space, with a secure parking area, and an exit, at the far end of this space. Communal WCs and the bin store are also accessed off the central space. 1,300sqm of the floorspace is workshops, 484sqm is circulation space outside the workshops, 935sqm is configured as a secure parking area and 120sqm is communal WC and bin store facilities. The accommodation is currently in a very poor state, and only three units are currently occupied. The properties suffer from water ingress from the podium deck, with water leaching through the structure (particularly through the expansion joints) and bringing corrosive salts, which both deposit in formations of the ceilings, and corrode the floors. The visual appearance of the entrance and communal parts of the workshops, and the condition of individual units, is very poor and floor, ceiling and wall finishes are degraded.

- 6.21 The units at Burmarsh Workshops have been near fully occupied in the past, which shows that there is demand for employment floorspace in this format and location, provided that the condition of the accommodation can be improved. The units are only partly beneath residential accommodation – half of the accommodation is below a podium deck (over which is playspace) and this section of the accommodation is at ground floor level, with rear (stepped) exits onto a tree-lined space adjacent to St Mark’s Church. There is also greater natural light potential in these units.
- 6.22 Whereas the on-site replacement provision is more typical B1 floorspace, the Burmarsh Workshop floorspace would be amenable to a wide range of semi-industrial uses, as a result of the lower rents that would be charged (due to the lower specification of the floorspace) and the nature of the units. As with the existing units, and the proposed on-site replacement provision, the Burmarsh units do not meet all the criteria of Category 2 units, however, they do benefit from being all on one level, secure entry to the units, good access for servicing and delivery and the provision of (more than sufficient) off-street parking, all of which are key criteria. Currently, floor to ceiling heights are restricted due to ducting and pipe work, and natural light is limited due to the inherent nature of the accommodation. However, these aspects will be improved through the refurbishment works described below.
- 6.23 The financial viability appraisal for the development has allocated a substantial sum for the refurbishment and upgrading of the floorspace at Burmarsh Workshops. This will comprise repairs to the concrete frame, waterproofing, insulation and new floor paving (55.0% of the total cost of works). These improvements to the structure of the accommodation will eliminate the impact of the water ingress, improve the thermal performance of the units and will enhance the aesthetics of the space. The workshop units will have new floor, wall and ceiling finishes, doors will be repaired or replaced and power and lighting will be upgraded to improve the quality of light within the units. Each unit will be provided with its own WC and kitchenette as this is a key factor in improving the marketability of the units (31.9% of the total cost). Improvements to communal areas, including signage, lighting, and improvements to the entrance and exit to the estate will enhance aesthetics and therefore marketability. There will also be works to circulation space, communal WCs and the parking area through floor, wall and ceiling finishes, repair or replacement of doors and sanitaryware. The access intercom system will also be upgraded. These works will improve the security of the premises, and will enable greater use of the parking area, through the bays being

properly marked out. There will be at least one dedicated parking space per unit, with additional visitor parking. These are key features of Category 2 units. These communal area works comprise the balance of the total cost of works. Allowance has also been made for preliminaries, professional fees, and contingency within the sum included in the financial viability appraisal.

- 6.24 These works will significantly enhance the marketability of the workshops and their attractiveness to a range of potential B1 occupiers. Advice has been received from the Council's Property Services Department from Lambert Smith Hampton (LSH) that considers that the main issues affecting marketability are access and the limited natural light, however, even with these issues, the units will still be of interest to businesses for whom these issues are not critical. Limitations on the hours of operation can adversely affect marketability, however, such issues can be resolved through discussions with prospective tenants. The inclusion of WC and kitchenette facilities into the units is considered essential for improving the marketability of the units, as are the improvements to parking and loading spaces. With the completion of the upgrading works, LSH considers that Burmarsh would be of particular interest to small (1-4 operatives), local, existing businesses, as well as start-up enterprises. Typically, this would include certain types of artisans, businesses involved in light assembly and finishing processes, cabinet/joinery fabricators, metal workers and food preparation, although the specific type of occupier would be tightly controlled through the lettings process to ensure compatibility with the surrounding residential units. It is thought that a high level of occupancy could be achieved within an 18-30 month period, which is considered reasonable given the flat economic outlook.
- 6.25 In summary, while some employment floorspace is being lost on site, replacement provision is being made in the form of a combination of on-site, flexible, higher-specification floorspace, and refurbished off-site, lower-specification, more affordable floorspace. The mix has been chosen to provide space for a wide range of potential occupiers, including those who are displaced from the existing units.
- 6.26 Overall, there will be significantly more usable employment floorspace available within the local area compared with that existing. Neither the existing or the proposed floorspace can meet all the Category 2 criteria, however, this is accepted in CPG5 (paragraph 6.11), and the policy intention is

to provide a range of floorspace with 'a selection' of the Category 2 criteria to provide a diverse choice of employment floorspace for occupiers.

e) Impact on Surrounding Properties

- 6.27 The design of the proposal has fully taken into account impact on surrounding properties and results in a much more positive environment than presented by the low quality buildings currently on site. Overall, the proposals are replacing a significantly run-down housing estate and employment units with relatively poor design quality with an attractive, well-designed, high quality, modern development which responds to its surroundings and helps to reduce crime and the perception of crime.
- 6.28 The proposals also respect and compliment the scale and character of the surrounding area. Particular consideration was given to the Grade I listed St. Martin's Church and the Grade II listed former St. Martin's Church Hall.
- 6.29 The development proposals are in accordance with Policy DP26 of Camden Development Policies DPD (2010). They will not cause harm to amenity and a range of factors have been taken into consideration. Visual privacy and overlooking; overshadowing and outlook; sunlight, daylight and artificial light levels are considered in the Daylight and Sunlight Assessment. Noise and vibration levels; and air quality, odour, fumes and dust are considered in the Noise and Vibration Assessment and the Air Quality Assessment respectively, as well as in the Construction Management Plan. The standard of accommodation in terms of internal arrangements, dwelling and room sizes and amenity space; facilities for the storage, recycling and disposal of waste; facilities for bicycle storage; and outdoor space for private or communal amenity space are considered in the Design and Access Statement. The Design and Access statement also provides a detailed analysis of how the proposed scale and massing of the proposed development relate to surrounding properties.
- 6.30 Numerous existing trees are to be retained within the site, particularly the vast majority of the mature perimeter trees on Wellesley Road, Haverstock and Vicars Road. These will provide amenity for the site and surroundings. No 'A' category trees are proposed to be removed. Mitigation for the trees that are to be removed is to be provided in the form of replacement trees and a

comprehensive landscaping strategy. Further detail is provided in the Tree Report and Landscape Strategy supporting the application.

f) Design

- 6.31 The design of the scheme is considered to be in keeping with the character of the surrounding area, and will allow the proposal to integrate with neighbouring development and surrounding urban landscape. As such, the urban design qualities of the area will be enhanced in accordance with Policy CS14/DP24 of the Core Strategy (2010).
- 6.32 Policy CS17 of the Core Strategy (2010) aims to make Camden a safer place through encouraging ‘appropriate security and community safety measures in buildings, spaces and the transport system’. The improvement to natural surveillance created by locating ground floor active frontages on all street facing properties will improve public safety and crime prevention, in accordance with the requirements of Policy CS17. The BLR site is well laid out from a crime prevention perspective. Due to the enclosed nature of the DHO site, the fact that some properties within the urban block are not within the scheme, and the need to maximise development on site, it is not possible to incorporate a development layout on the site which fully designs out the potential for crime and anti-social behaviour.
- 6.33 The most appropriate urban design solution in this case is to provide a clear separation of public and semi-private space by providing gating at the eastern entrance to the DHO site. Paragraphs 9.13 of CPG1 Design (2011) requires applications which propose restricting access to, from or gating of, the public highway or designated open spaces that are currently accessible to the public gating to:
- ‘explain clearly the rationale for the reduction in access and be able to demonstrate that it is an appropriate solution, which minimises negative impacts in, adjacent to and in the vicinity of the development;
 - provide evidence of anti-social behaviour and crime to support the proposed restricted access; and
 - demonstrate the alternative steps they have taken to address the problems’.
- 6.34 It should be noted that this guidance does not apply to the gating proposed at the DHO site in this application. The proposals do not gate the public highway or designated open spaces that are currently accessible to the public.

- 6.35 It is not appropriate for the enclosed courtyard of the DHO site to be a through route as it is not a direct route with clear sight lines. It is also not possible to provide full natural surveillance due to the blank facades of existing buildings outside the red line boundary directly abutting the space.
- 6.36 The communal open space within the scheme can be attractive and usable if the residents of the development feel like they have ownership of the spaces (through limiting access to the interior of the block) and play an informal role in policing them.
- 6.37 CCTV has been considered instead of the gating solution. However this is a reactive measure that CPG1 specifically advises against (paragraph 9.6).
- 6.38 There is a high risk of crime and anti-social behaviour in the area. This is highlighted in the Cabinet Report of 12 September 2012 and is strongly endorsed by residents of the BLR estate, who are also very much in favour of the gating solution. If gating was not to be proposed, there will not only be risks to surrounding residents in terms of crime, community safety and anti-social behaviour; there is a risk of vandalism to the playspace and buildings. There are also disadvantages in terms of additional target-hardening measures that residents may employ to protect their properties (i.e. grilles on the ground floor windows).
- 6.39 In addition the gate can become a piece of public art, which can help to create a sense of identity for the development; provide a contribution to the attractiveness of the public (as well as private) realm; and potentially also be a focus for bringing together the new community in terms of commissioning and creating the installation.
- 6.40 The broad specifications of the gating design have been agreed in a meeting with Adam Lindsay, Crime Prevention Design Officer held on 3 October 2012 (minutes of which are in the Design and Access Statement). A gating solution to the eastern access to the DHO site was considered preferential to a cul-de-sac solution and the gating was recommended to be a minimum of 2.5m high.
- 6.41 It is proposed that the specific design of the gate will be requested to be conditioned to facilitate the involvement of an artist in the detailed design.

6.42 There is no one solution to make Camden a safer place. Therefore a combination of well-designed street layouts and building locations to create passive/natural surveillance as well as gating will help to 'design out' safety issues.

6.43 The requirements of the crime impact assessment are provided in the Design and Access Statement.

g) Scale, Height and Massing

6.44 The surrounding area comprises large residential blocks averaging 4 storeys high and the 22 storey residential Bacton Tower is located to the north of the site. The urban fabric is a mixture of traditional finer-grain Victorian street patterns and properties, and coarser-grain, larger scale post-war housing estates. While there is not a coherent urban structure and form in the locality of the application site, the proposals seek to ensure that the new development integrates well into the existing character of the surrounding development and use the site area efficiently.

6.45 The application proposals comprise medium rise buildings of 3, 4 and 5 storeys throughout the site, with taller elements on Wellesley Road and Haverstock Road (up to 7 storeys), and at the entrance to the site on Vicars Road (up to 8 storeys). The variety of flats, maisonettes and town houses provides a varied streetscene. The scale, height and massing of the proposed development also carefully considers the setting of St. Martin's Church. The views of the Church are not compromised, and a central feature of the scheme is the provision of a public open space, formed by the widening of the new east-west link, at the intersection of Vicars Road and Wellesley Road, opposite the Church, in order to enhance its townscape setting and open up views to the church from the centre of BLR part of the site.

h) Access

6.46 This application proposes a car free development. Although the site is located within an area with PTAL Level 3, 'Moderate', it is considered that the site is appropriate for car-free development as per the guidance contained in Policy CS11 of the Core Strategy (2010) and Policy DP18 of the Development Policies DPD (2010). Where existing social rented tenants of BLR have an on-street parking permit, or off-street garage or courtyard parking space, these will be maintained, and the off-street spaces re-provided in existing underused garage spaces associated with the Weedington

Estate. New off-street parking spaces will only be provided for adapted wheelchair-accessible residential units (i.e. not easily-adapted wheelchair-accessible units), at an overall rate of 0.5 spaces per unit as agreed with the LPA. A car club space and an electric vehicle charging space will also be provided in accordance with Policy DP19 of the Development Policies DPD (2010).

- 6.47 The current use of Haverstock and Wellesley Roads will be maintained. The parking associated with the adapted wheelchair-accessible residential units will be provided on Haverstock Road and in the area between the site and the Bacton High Rise building, where the car club and electrical vehicle bays will also be provided. Refuse vehicles would turn in the space between BLR and Bacton High Rise at the end of the road. This proposed vehicle circulation system will provide a more clearly defined pedestrian/cycle route.
- 6.48 Each residential and employment unit has been provided with the required number of appropriately designed cycle parking spaces, as set out in the London Plan and Camden planning policies (Development Policy DP17) and guidance, as described in the Design and Access Statement and Transport Assessment, where full details of the parking strategy and cycle parking strategy are set out.
- 4.23 All the new homes have been designed to Lifetime Homes standards, and 10 percent (29 units) are wheelchair accessible units. The public open space and communal open space has also been designed to be inclusive and accessible, as described in the Design and Access Statement.

i) Sustainability

- 6.49 Policy CS13 of the Core Strategy (2010) and Policy DP22 of the Development Policies DPD (2010) requires all developments to minimise the effects of and adapt to climate change. In response to this, the proposals promote the efficient use of land and buildings, represent sustainable design and will incorporate sustainable construction measures.
- 6.50 The proposals aim to 'be lean' and use less energy, through the adoption of passive design measures (such as optimising natural ventilation and solar gain while limiting excessive solar gain) to minimise the energy demand of users of buildings. The building fabric is designed with a high thermal mass and a good level of insulation and air tightness to further reduce the energy demand of buildings.



- 6.51 The proposals aim to 'be green' and supply energy to dwellings efficiently, though a connection to the Royal Free Hospital CHP network. This was welcomed in pre-application discussions with the LPA.
- 6.52 The combination of these two strategies produces a sufficient reduction in expected carbon dioxide emissions to meet the overall policy objectives of the London Plan and the Camden Core Strategy. The proposals also seek to achieve Code for Sustainable Homes (CfSH) Level 4 in accordance with Policy DP22 of the Development Policies DPD (2010). Further information on the approach to reducing energy demand and carbon emissions is provided in the Energy Strategy.
- 6.53 The Sustainability Strategy outlines how the proposals are anticipate to meet CFSH Level 4.

7 PLANNING OBLIGATIONS

- 7.1 The application scheme is a ‘Council’s own development’ and therefore matters that would normally be the subject of a planning agreement will be secured by planning condition. It is anticipated that a ‘shadow section 106 agreement’ will also be secured so that such matters would become a planning agreement should the site be subsequently sold by the Council.
- 7.2 Discussions on the scope of the shadow section 106 agreement have been undertaken in pre-application meetings held with the LPA. It has been agreed with the LPA that planning conditions and the shadow section 106 are likely to cover a range of financial and in-kind contributions, which are discussed under the headings below.
- 7.3 Before shadow section 106 heads of terms are discussed, it is important to recognise that the project is an estate regeneration proposal, which is delivering a significant number of intrinsic benefits, both tangible and less tangible. In particular, the scheme is providing a significant upgrade of affordable housing provision on site, when compared to the quality of living accommodation currently on site. It is also delivering significant public realm improvements, including opening up the currently inward-looking estate through the positive pedestrian spaces and routes. In addition, estate regeneration delivers more intangible benefits such as reducing crime and the fear of crime and acting as a catalyst for the wider regeneration of the area. Any reasonable contributions should be balanced against the benefits provided by the scheme as a whole.
- 7.4 In accordance with the NPPF (paragraph 203 and 204), local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition. Planning obligations should only be sought where they meet all of the following tests:
- Necessary to make the development acceptable in planning terms;
 - Directly related to the development; and

- Fairly and reasonable related in scale and kind to the development.

Construction Management

- 7.5 The implementation of a demolition and construction management plan and a noise monitoring and management plan is anticipated to be secured. This is to protect the amenity of residents and businesses surrounding the site during the construction phase of development. This can be secured by an appropriately worded condition.

Apprentices

- 7.6 It is proposed to provide a contribution to support apprentice placements associated with the scheme, in accordance with CPG8 (£1,500 per £3m of building cost).

Amenity Space, Playspace and Public Open Space

- 7.7 The proposed development includes a considerable amount of on-site private and communal open space, including private gardens, patios, private and shared roof terraces, hard landscaped mews spaces and shared green courtyards incorporating play spaces, which is more than sufficient to meet the needs of the proposed housing on site, as set out by the GLA's Play and Informal Recreation SPG (September 2012).
- 7.8 In terms of a contribution to public open space, CPG8 sets out a formula for contributions. This contribution is based on the capital cost for new provision, the cost of maintenance for the first 5 years and administration and design costs. The formula is based on a net increase of the housing delivered on-site, and for the proposed scheme.
- 7.9 The level of contribution produced by the formula then needs to be assessed on a site by site basis and balanced against any public open space to be delivered on site. These proposals include a new home-zone type space linking Wellesley Road with Haverstock Road. This space will be attractively landscaped with semi mature tree planting and it opens into a wider public space at the intersection of Vicars Road to provide views of St. Martin's Church. The cost of providing this space is set out in the Financial Viability Assessment which it is proposed will be deducted from the public open space contribution. It is proposed that a proportion of the remainder of the contribution

produced by the formula is directed towards the installation of local play areas at the adjacent Lismore Circus, for which there is local demand.

Education

- 7.10 Education contributions are calculated based on a per pupil basis arising from the appropriate child yield arising from the development. CPG8 states that where the local authority will have 100% nomination rights over the affordable housing provided, this can be discounted from the overall calculation of education contribution. Furthermore the LPA have confirmed that they will only seek a contribution for primary school places. Therefore, using the methodology set out in CPG8 the education contribution from the scheme is proposed to be £173,895.

Community Facilities

- 7.11 The LPA apply a per bedroom cost for community facilities which include community centres and recreational facilities such as halls, libraries and indoor sports halls. Based on the net uplift of dwellings within the scheme, a standard contribution to community facilities can be calculated, however, this contribution needs to take into account wider community benefits which are to be delivered as part of the proposals.
- 7.12 There are already community facilities on the Bacton Low Rise site, including the Bacton Tenants Residents' Association (TRA) Hall, a community meeting place that is used to host a wide range of community events. This facility is being improved as part of the regeneration of the estate, and it is proposed to subtract the cost of these works from the proposed community facilities contribution. Any remaining balance of the contribution could be used towards improving local community facilities such as the Gospel Oak City Farm which is located in close proximity to the site, and which has a clear funding need.
- 7.13 The London Borough of Camden is proposing that Real Deal Community Partnership (RDCP) will lead the process on making decisions about how to meet the impact of additional households on local amenity space as a result of the redevelopment of Bacton Low Rise housing and the Gospel Oak District Housing Office. The Gospel Oak Regeneration Team will work with the RDCP to support them on the decision making process if the RDCP agree to this proposal.

Public Art

- 7.14 During pre-application meetings it was agreed in principle that an on-site in-kind contribution to public art could be made through the commissioning of a bespoke entrance gate feature to the eastern entrance to the DHO site to positively integrate with the development and help create a sense of place.

Climate Change and Environmental Impacts

- 7.15 The proposed scheme will be replacing very energy inefficient homes with new residential development that will meet the Code for Sustainable Homes Level 4, and will involve connection to the Royal Free Hospital Combined Heat and Power heating system. The measures implemented to achieving this standard will provide a range of in-kind contributions and the LPA has advised in pre-application meetings that a further financial contribution is not necessary. The energy strategy can be secured through an appropriately worded planning condition.

Car Free Development

- 7.16 It is proposed that the development will be car-free. Some of the existing residential units have parking spaces which contractually need to be re-provided and these will be provided off-site on vacant garages in Weedington Road. Limited accessible parking is also proposed on site to serve the wheelchair accessible units. All other units will be car free and any leases or freehold contracts will ensure that occupants of the development will not be able to secure a residents parking permit. This will be secured through an appropriate clause in the shadow S106 agreement.

Transport and Highways

- 7.17 The starting point for any necessary and reasonable transport and highways contribution is that the development is car-free and will have negligible impact on the surrounding road network. While it is accepted that the development will involve more people using the area and it may be appropriate to secure some kind of reasonable contribution towards pedestrian and cycle facilities in the area, the Transport Assessment has shown this impact to be marginal.

- 7.18 The proposed transport and highways contribution comprises three elements, the cost of on-site highway works, on-site in-kind contributions to the pedestrian and cycling environment, and a financial contribution to specific schemes to improve the wider pedestrian and cycling environment.
- 7.19 In terms of the first element, the proposed scheme will generate the need for some on-site highway works, including footway repaving, removal of vehicle crossovers and guard railing, and Stopping Up Order costs associated with the release of the section of public right of way adjacent to the junction of Wellesley Road and Vicars Road.
- 7.20 These works would be secured through an appropriately worded condition or a shadow section 278 agreement, the form of which is to be agreed with the LPA. The works will be delivered as part of the proposals and therefore do not need to be subject to a separate financial contribution.
- 7.21 In terms of the second element, the proposed scheme includes on-site in-kind contributions to the improvement of the surrounding pedestrian and cycling environment, including implementing a number of measures which will promote sustainable forms of travel, such as walking and cycling. The first of these measures is the creation of the new east-west link through the scheme, which is considered above in the Public Open Space section.
- 7.22 In terms of the third element, a financial contribution is proposed to fund specific schemes to improve the wider pedestrian and cycling environment. The starting point for the contribution towards these schemes is the Transport Assessment. A number of schemes have been considered in the Transport Assessment, and one of these has been identified as necessary in the Transport Assessment, and the pedestrian environment survey that was undertaken in the preparation of it.
- 7.23 This scheme is to make improvements to the street environment in Haverstock Road, to enhance this walking and cycling link and make it a more amenable route for walking and cycling. Haverstock Road was also identified in pre-application meetings with the LPA to be a key north-south link through the area. It is proposed that the cost of the proposed works to Haverstock Road will be counted towards the transport and highways contribution.

Affordable Housing

7.24 This is dealt with in Section 8, the Affordable Housing Statement.

Employment Floorspace

7.25 The proposed scheme results in a loss of employment floorspace on site. Section 6 of this report sets out the rationale for providing replacement floorspace, through a combination of on-site, flexible, higher-specification floorspace, and refurbished off-site, lower-specification, more affordable floorspace at Burmarsh Workshops. It is proposed that these works are carried out by the developer and secured to be delivered through an appropriately worded condition or clause in the shadow section 106 agreement. The cost of carrying out the works is specified in the confidential Financial Viability Assessment.

Community Infrastructure Levy

7.26 The proposal will be liable for the Mayor of London's Community Infrastructure Levy (CIL). Mayoral CIL will be calculated at the rate of £50 per sqm on the net additional increase in gross internal floorspace in the scheme. In calculating Mayoral CIL, social housing relief and the floorspace of existing buildings on site which are proposed to be demolished will be taken into account.

7.27 The Planning Application Additional Information Requirement Form has been submitted with this planning application.

8 AFFORDABLE HOUSING STATEMENT

- 8.1 Policy CS6 of the Core Strategy (2010) aims to secure high quality affordable housing based on an overall guideline target that 50% of the total addition to housing floorspace should be affordable. The LPA seeks to negotiate a contribution from specific proposals on the basis of the maximum reasonable amount of affordable housing under the specific circumstances of the site, including the financial viability of the development. The policy also includes the guideline split of 60% social rented housing and 40% intermediate affordable housing.
- 8.2 Housing is the identified priority land use of Camden's Local Development Framework (LDF), and the delivery of affordable housing is a high priority in terms of securing planning obligations. As this is an estate regeneration scheme, the approach that has been taken to determining the tenure mix of residential development is as follows:
- Step 1: Decanting Strategy – The housing needs of the existing tenants of the Bacton Low Rise estate were assessed with regards to the Local Lettings Policy that the Council has adopted for the Bacton Low Rise Estate Regeneration (by the Director of Housing and Adult Social Care on 12 June 2012) and this has informed the housing mix that has been proposed in the application. For a number of reasons, the decanting mix does not exactly match the proposed mix of units. This includes the fact that not all residents wish to remain at Bacton (30% indicated they would want to move off the estate when the Housing Needs Survey was initially undertaken – in February 2011), and this proportion may increase for tenants who are projected to be decanted in the later phases of the scheme. Secondly, housing needs are anticipated to change, between the point when the Housing Needs Survey was undertaken and the date when the housing allocations are made (starting around Spring 2013), due to factors such as families growing, or older children leaving the household. In addition, there are proposed changes to the housing benefits system (withdrawal of payments for spare bedrooms and payments for people under age 25), whereby tenants may choose to occupy a smaller or larger property than they would otherwise be entitled to, depending on the household's particular housing situation.

- Step 2: Planning Policy – The planning policies of the LDF have been taken into account, particularly CS6 on providing quality homes, DP2 on making full use of Camden’s capacity for housing, DP3 on contributions to the supply of affordable housing, DP4 on minimising the loss of affordable homes, and DP5 on homes of different sizes. These policies have informed the tenure and mix of the *net additional* housing that has been provided in the redevelopment proposals.
- Step 3: Financial Viability – In cognisance of 1 and 2 outlined above, which respectively place demands on the quantum and mix of social-rented dwellings which are needed in the proposed scheme, and the balance and mix of affordable and market dwellings which are required by policy, the viability of the scheme is also a key consideration in determining the housing mix. A confidential Financial Viability Assessment will be submitted one week after the planning application is submitted. This contains a detailed analysis of the value and costs of the scheme to validate the proposed level of affordable housing and planning obligations that the scheme can afford to fund, whilst remaining ‘viable’. The approach that has been taken to viability in this scheme is that, as a ‘Council’s own development’, a straightforward balance is sought between development values and development costs (which include affordable housing and planning obligations). This means that the Bacton Low Rise Regeneration project can sustain a higher level of affordable housing and planning obligations than would be possible if the approach to viability were to be undertaken on a commercial basis which would include land values and developer’s profit. A Financial Viability Assessment undertaken on a commercial basis will be included in the confidential submission for comparative purposes.

8.3 The applicants have discussed the provision of affordable housing through pre-application meetings with the LPA. The scheme delivers 290 housing units in total, 176 of which are for market sale and 114 of which are affordable units (see Table 1 in Section 4 above). On a *unit basis*, this equates to 39.3% of the total number of units.

8.4 In terms of net internal residential floorspace, the scheme delivers 24,157 sqm in total, of which 11,302 sqm (NIA) is affordable residential floorspace (see Table 2 below). On a *floorspace basis*, this equates to 46.8%, which reflects the fact that larger affordable units are being provided, which the LPA have indicated to be acceptable for an estate regeneration scheme of this type (see Table 3

below). The tenure of the units is proposed to be a mixture of social rented and intermediate housing, as discussed in Section 6 above.

Table 2: Proposed Floorspace Breakdown of Residential Development (NIA)

Number of Bedrooms	Social (m ²)	Market (m ²)	Intermediate (m ²)	Total Residential Scheme (m ²)	Total Affordable (m ²)
1	732.90	3,325.86	0	4,058.76	732.90
2	3,560.26	5,491.14	0	9,051.40	3,560.26
3	3,967.36	3,200.13	1,183.14	8,350.63	5,150.50
4	806.35	838.24	0	1,644.59	806.35
5	860.99	0	0	860.99	860.99
6	190.79	0	0	190.79	190.79
Total	10,118.65	12,855.37	1,183.14	24,157.16	11,301.79
Floorspace as a % of Residential development	41.89	53.22	4.9	100	46.79

Table 3: Percentage Split of Residential Development by Floorspace

Number of Bedrooms	Floorspace as % of Social Rented Units	Floorspace as a % of Market Units	Floorspace as % of Intermediate Units
1	7.24	25.87	0
2	35.19	42.71	0
3	39.21	24.89	100
4	7.97	6.52	0
5	8.51	0	0
6	1.89	0	0
Total	100	100	100

8.5 There are currently 87 social rented units on site. It is proposed that 104 social rented units are re-provided within the scheme (an uplift of 17 units). Over and above this uplift, it is also proposed to provide 10 intermediate units within the scheme. This produces a total of 27 additional affordable units to be provided as part of the scheme, an increase of 31% on the number of existing affordable units.

8.6 Of the 87 social rented units currently on site, 33 of these are two-bedroom units, 49 are three bedroom units and 5 are four-bedroom units. As illustrated in the final column of Table 4 below, the number of one-bedroom units will increase by 14 and the number of two-bedroom units will increase by 13. The number of three-bedroom units will decrease by 6 units; however, this is balanced by the provision of larger units which do not exist within the scheme currently. The scheme will additionally provide 5 five-bedroom unit and 1 six-bedroom unit.

Table 4: Uplift of Residential Development by Unit Numbers

Number of Bedrooms	Total Existing Social Units* (No. of Units)	Total Proposed Affordable Units (No. of Units)	Total Proposed Units (All Tenures) (No. of units)	Uplift (Affordable Units - Existing Units) (No. of units)
1	0	14	78	14
2	33	46	122	13
3	49	43	74	-6
4	5	5	10	0
5	0	5	5	5
6	0	1	1	1
Total	87	114	290	27

* Excludes 12 existing market properties

8.7 In terms of floorspace, the gross internal areas of the existing BLR development and the proposed development are shown in Tables 5 and 6 below. Because of the difficulties in calculating the existing BLR floorspace, it is more accurate to work on a unit basis when calculating the uplift of affordable development. Further information on the calculation of the figures in Table 5 is provided in the Design and Access Statement.

Table 5: Existing BLR Floorspace Breakdown (GIA)

Number of Bedrooms	Social Rented (m ²)	Market (m ²)	Total Scheme (m ²)
2	2,679.6	406	3085.6
3	4,733.4	676.2	5409.6
4	545.5	0	545.5
Ancillary	-	-	5169.38
Sub-Total	7,958.5	1,082.2	14,210
Percentage Allocation of Ancillary (%)	88.03	11.97	100

Allocated Ancillary (m ²)	4,550.6	618.8	5,169.4
Grand Total	12,509.1	1,701	14,210.1

Table 6: Proposed Floorspace by Use (GIA)

	Social	Market	Intermediate	B1 Employment	Ancillary	Total	Total Affordable
Sub-Total GIA (m ²)	12,500.52	17,396.27	1,334.57	253.3	750.85	32,235.51	13,835.09
Percentage Allocation of Ancillary (%)	39.7	55.25	4.24	0.80	-	99.99	-
Allocated Ancillary (m ²)	298.09	414.84	31.84	6.01	-	750.78	329.93
Grand Total (m²)	12,798.61	17,811.11	1,366.41	259.31	-	32,235.44	14,165.02

8.8 The application drawings illustrate the location of social rented and intermediate residential units within the scheme, and the annotations on the plan indicate the numbers of bedrooms and proposed occupancy of the affordable units. The floorspace of all affordable units is provided within the schedules in the Design and Access Statement.

8.9 It is intended that the Council will lead the development of the Bacton Low Rise Regeneration project, and that a joint venture with either a private developer or a registered social landlord will not be necessary. In that light, the Council will have full nomination rights in allocating the residential units.

9 CONCLUSIONS

- 9.1 This Planning Statement has been prepared in support of a full planning application at the Bacton Low Rise Estate and the District Housing Office site, Gospel Oak, Camden. The application seeks approval for the demolition and redevelopment of the District Housing Office (115 Wellesley Road) and workshop buildings (2-16 Vicars Road), followed by phased demolition and redevelopment of Bacton Low Rise (residential properties at nos. 121-219 – 99 units in total) to provide 290 residential units, comprising both affordable and market properties, employment floorspace and associated works.
- 9.2 The proposals include a number of significant benefits are appropriate in land use planning terms, in particular:
1. The principle of development is acceptable and is supported by adopted and emerging planning policy and is a committed proposal in the Community Investment Programme and a fundamental component of Camden's five year housing supply;
 2. The proposal will provide an appropriate quantum, tenure mix and unit mix of residential accommodation;
 3. The scheme makes adequate provision for employment floorspace, both on and off-site and in fact substantially increases the level of affordable workspace locally;
 4. The scheme has been sensitively designed to respect the urban structure, urban form, scale and character of the surrounding area, and has been designed to prevent any adverse impacts on surrounding residential amenity or the setting of listed buildings;
 5. The scheme incorporates new and improved public, communal and private open space and other improvements to the public realm; and
 6. The proposals comply with relevant policies on transport and highways, energy and sustainability and access and inclusivity.
- 9.3 The proposal is therefore for a sustainable development which complies with national, regional and local planning policy, and, in accordance with the NPPF, should therefore be approved without delay.