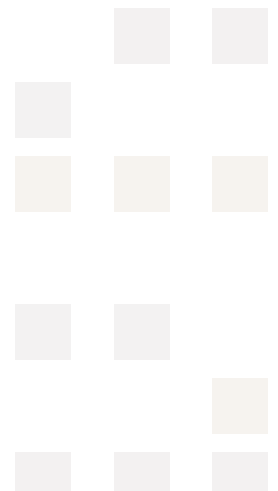


10 and 10a Belmont Street, London, NW1

Planning Statement

Prepared for:
Risetail Ltd
46 Great Marlborough Street
LONDON
W1F 7JW

August 2008



Revision Schedule

Belmont Street: Planning Statement August 2009

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1 Introduction

- 1.1 This Planning Statement is submitted in support of a full application by Risetall Ltd for a mixed use development including employment space and student accommodation on the land known as 10 – 10a Belmont Street, London, NW1 8HH.
- 1.2 The statement seeks to set out the background to the proposed development and the detailed planning justification for the proposal
- 1.3 This statement should be read in conjunction with:
- Scheme drawings prepared by John Pardey Architects
 - Design and Access Statement prepared by John Pardey Architects
 - Energy Statement prepared by Richard Hodgkinson Consultancy
 - Sustainability Assessment and BREEAM Pre-Assessment Estimator prepared by Richard Hodgkinson Consultancy
 - Transport Statement prepared by Scott Wilson
 - Travel Plans prepared by Scott Wilson (Residential and Office)
 - Construction Management Plan prepared by Scott Wilson
 - Noise Assessment prepared by Scott Wilson
 - Sunlight & Daylight Study prepared by Right of Light Consulting

2 Site and Surroundings

The Site

- 2.1 The site is located at the eastern end of Belmont Street and is situated less than 100 metres from Chalk Farm Road.
- 2.2 The application site comprises a total site area of 635 m². Currently on the site is a five storey plus attic floor 19th Century building (originally a piano factory), at 10a Belmont Street and a Victorian terraced house at 10 Belmont Street. The single-storey warehouse building in front of the main piano factory is also part of 10a Belmont Street, but does not form part of the application site.
- 2.3 The building at 10a Belmont Street is of a rectangular shape. It features a low pitch roof, with a dormer roof extension and several roof lights within the remaining part of the roof. The fenestration style on the front elevation of the building is a uniform pattern, which appears to be largely original and is in keeping with the general style of the area.
- 2.4 To the rear of the existing building is a servicing and delivery area, accessed from Ferdinand Street. Access to this area is slightly restricted due to the low bridge (3.2 metres maximum headroom) located between numbers 17 and 27 Belmont Street providing the only access to this area.
- 2.5 There is a shallow forecourt at the front of the building and a small private road. No form of boundary treatment exists, unlike many of the other properties within the square. Vehicular access is currently gained via Belmont Street to the front of the building.
- 2.6 The flank wall of 10a Belmont Street abuts the rear boundaries of 70-73 Chalk Farm Road, which comprises restaurant and retail uses at ground floor and residential above (on 70 Chalk Farm Road). In front of the building to the west are three 3-storey residential terraced properties, with flat roofs and located on the corner of Belmont Street. Immediately to the rear of 10a Belmont Street is a single storey light industrial/workshop building, which currently shares access to the rear with 10a Belmont Street. To the north of the site are the three terraced properties of 10-14 Belmont Street and at the end of this terrace is a private access (assumed for residents only) to Ferdinand Street to the east. Further north of this access is the flank of wall of an eight-storey residential block.
- 2.7 The building at 10a Belmont Street originally functioned as light industrial use, but has more recently been utilised for a variety of employment uses, and is currently in use as B1a offices. Tenancy schedules attached at Appendix 1 demonstrate this use of the building since 1999 and show that it has also been used for a range of B1 employment uses within this period. It employs approximately 215 people. There has, however, been difficulty in letting the property over the past two years and therefore a number of these companies are now on short leases and paying reduced rent. Further details are set out in the Land Use Implications section of this statement. Internally, the employment spaces are characterised by a high stud wall with a row of windows. The total internal employment space is approximately 2250 m², over six floors.

- 2.8 The ground floor of 10a Belmont Street features two sets of double-doors at both the front and rear. A goods lift is located in the middle of the building, accessed via the narrow door at both the front and rear and providing access to the upper levels. The ground floor area is divided in two via a central corridor which provides access through the building and wc facilities are provided at either side of this corridor for the respective employment spaces.
- 2.9 The first and second floors of 10a Belmont Street feature an open employment space to the south side of the building. At the north side of the building, the space is divided into a number of spaces in order to make it suitable for business use, with a reception area, open space for business uses (currently there is one occupier per floor on the north side) and four meeting rooms on each floor. The goods lift discharges into a central corridor, with narrow doors provided to access the business units.
- 2.10 The third floor of 10a Belmont Street accommodates a complex arrangement of spaces, including some open plan employment space, two meeting rooms, wc's and a small kitchen. Narrow doors lead from the central lift and stairwell area into the employment spaces. This floor is currently occupied by two companies.
- 2.11 The fourth floor of 10a Belmont Street features two open plan employment spaces, divided by the central lift shaft and stairwell. The floor is currently occupied by two separate companies.
- 2.12 The building at 10 Belmont Street is a nineteenth century three-storey terraced property. It forms part of a row of three terraced properties, all of a similar scale and architectural detail. The terraces feature a detailed parapet which continues across all three properties. The fenestration pattern is uniform for all three houses and constructed in the same brick as 10a Belmont Street. The property is currently in residential use as a four-bedroom family home with a gross internal area of approximately 120 m².
- 2.13 Having been subject to extensive bomb damage during the war, the original composition of Belmont Street, which comprised of terraced houses arranged around a square, has largely been lost. Although a small number of original buildings remain, the urban form has been significantly altered with the construction of the newer residential blocks and towers in the twentieth century.
- 2.14 The site has no specific designation within the UDP. It is not located in a conservation area. However, it is in the vicinity of the listed Roundhouse Theatre (approximately 100 metres away on Chalk Farm Road) and the listed Kent House (approximately 100 metres away off Ferdinand Street). Additionally, it is in the vicinity of West Kentish Town Conservation Area (approximately 200 metres to the north of the site), Harmood Street Conservation Area (approximately 200 metres to the east of the site) and Regent's Canal Conservation Area (approximately 100 metres to the south of the site). Further details of the impact of the proposed development on these conservation areas will be provided within the Character & Design section of this report.
- 2.15 The site is in a highly accessible location, close to Chalk Farm Road which provides regular bus services to north and central London. The site is also in close proximity to Chalk Farm tube station and has a public transport accessibility level (PTAL) of 5, which is a very good rating.

The Surrounding Area

- 2.16 The site is located within an area characterised by a mix of scale, density, and land uses, set out in a close knit urban grain. The built form tends to rise from lower and smaller scale development of two or three storeys on Chalk Farm Road towards taller and bulkier buildings to the north, in the form of twentieth century residential blocks, punctuated by open areas of grass.
- 2.17 It is important to acknowledge the wide range of building heights in the vicinity of the site, which are considered to play an important role in defining the current streetscape.
- 2.18 Belmont Street forks off in two directions, with the application site on the right. Upon entering Belmont Street, development on either side of the road is mainly three storeys high. On the east side of Belmont Street the Sainsbury's supermarket is three storeys high fronting onto Chalk Farm Road with a set back fourth storey. This building continues along its return frontage onto Belmont Street as three storeys, with the exception of a taller wooden clad infill element which extends to five storeys. Adjoining this building is a five storey brick-faced building. The three buildings which adjoin this form the rest of the terrace and are three storeys high (plus a basement level), with raised front doors and railings down to street level and lightwells below. These appear to be wholly residential. There are a similar group of properties opposite which appear to date from the same period and terminate at the same point as those on the opposite side of the street. Views of the Roundhouse are gained from this part of the street.
- 2.19 Facing the flank wall of the terraces at 10-14 Belmont Street is an eight-storey block known as Mead Close with open space to the side and rear. Belmont Street terminates at this point as it leads in to the rear courtyard of Hardington Tower.
- 2.20 Building heights increase to the north of the site to between four and eight storeys. There are 12 identical flat roof and rectangular shaped local authority residential blocks of four storeys high arranged in a pattern facing into the square. These blocks link up to Beauvale to the east and Crogsland Road to the west. The twenty storey Denton Tower is located to approximately 200 metres to the north of the site and the eleven-storey Hardington House is located approximately 50 metres to the north-west of the site, located in the centre of the square and surrounded by a small area of green space, with open car parking, garages and refuse stores to the rear.
- 2.21 Belmont Street then begins to open out into its original square configuration. This part of the street is very mixed in character. The development site is located in the south east corner of the square. In the south-west corner of the square, the buildings at 13-29 Belmont Street are three storeys in height and of relatively poor architectural quality. The Charlie Ratchford community centre building is a single storey building, which does not contribute to the character of the area in architectural terms, and is located on the west-side of the square.
- 2.22 The car park and loading area forming the rear of the site also serves a number of other low-rise industrial buildings in this area. Further to the rear, to the south-east of the site, is the Grade 2 listed Kent House, which fronts on to Ferdinand Street.
- 2.23 The site's proximity to Chalk Farm Road and Camden High Street means that there is easy access to a wide range of facilities and amenities.

Planning History

- 2.24 Historic research has shown that the properties date back to the 18th century. The Council's records hold details for parts of the site back to 1968.

10 Belmont Street

- 2.25 There is no planning history in relation to this property.

10a Belmont Street

- 2.26 In 1970 a planning application was submitted for the sites of 59-73 Chalk Farm Road, 2-10 Belmont Street and 10a Belmont Street to be redeveloped and a Magistrates Court to be erected. Permission for this was refused (application reference H10/5/G/9688).
- 2.27 In 1971 planning permission was refused for the redevelopment of 10a Belmont Street into a four storey factory (application reference H10/5/G/10563), within which the current use of the building is stated as 'warehouse and workshops.'
- 2.28 In 1975 planning permission was refused for the change of use of the ground floor of 10a Belmont Street to a cinema to seat 100 persons (application reference 20411).
- 2.29 In January 1976 planning permission was granted for the provision of a new means of access to the highway (application reference 21850). Within this permission, the use of the building is confirmed as light industrial.
- 2.30 In 1982 planning permission was refused in for the change of use of the southern unit on the first floor of 10a Belmont Street from light industrial to a centre for cultural and arts discussion together with the provision of hot meals (application reference 33759).
- 2.31 In 1984, planning permission was granted for the erection of a roof extension to provide increased storage accommodation for light industrial purposes (application reference 8401619). Further to this, in 1988 permission was granted for the erection of a dormer roof extension to provide additional B1 accommodation (application reference 35781). Minor alterations were made to this in February 1989 (application reference PL/8802499).
- 2.32 In December 1985, planning permission was granted for the installation of telecommunications equipment, including 6 antennas within chimney pot shrouds and 3 equipment cabinets at roof level (application reference 2005/4613/P).
- 2.33 In February 2006, planning permission was granted for a change of use of the fourth floor offices (class B1a), on the basis that the space had been vacant since April 2005, to a gymnasium (class D2) (application reference 2005/5574/P). This change of use was not implemented.
- 2.34 Further to the February 2006 application a planning application was submitted in July 2006 for the change of use of part of the ground floor from business use (class B1) to leisure use (class D2), for use as a fitness studio (application reference 2006/2058/P). Permission was refused due to the proposed loss of business use, where there was potential for that use to continue and without sufficient marketing information to prove otherwise.

- 2.35 This analysis of the planning history for 10a Belmont Street demonstrates that a range of B1 business uses have been consistently operating at the site for a considerable period of time. Over the past 10 years, it has been used predominantly for B1a and B1b uses and is currently used as B1a offices only. However, it is acknowledged that the ground floor the building is also appropriate for B1c use, as referred to within the July 2006 application for this part of the site.

12 Belmont Street

- 2.36 In 1968 planning permission was granted for the conversion of the terraced house at 12 Belmont Street into three one-bedroom flats (application reference H10/5/5/5012).

14 Belmont Street

- 2.37 In April 2006 planning permission was refused for the erection of a Mansard style roof extension, in association with the conversion of the existing self-contained ground floor and first and second floor self-contained maisonette into two one-bedroom self-contained flats and one two-bedroom self-contained maisonette (application reference 2006/0794/P).

3 The Planning Application Proposals

The Proposed Development

- 3.1 The proposed development is for the demolition of the existing buildings at 10 and 10a Belmont Street and the erection of a new building, similar in scale and massing to the existing buildings on the site. On the site of numbers 10 and 10a Belmont Street, the building will be ground plus seven storeys (with upper and lower basements). The proposed development will provide accommodation for 163 student units.
- 3.2 The proposal is set back from the existing building line, therefore reducing the overall visual impact of the development on its surroundings. At its highest point, it is three metres higher than the existing building at 10a Belmont Street, although the majority of the proposed development is approximately 1.6 metres higher. The terraced properties at 12 and 14 Belmont Street will remain and will be connected to the new development with the proposed 'link' element which will replace the existing house at 10 Belmont Street. The design of the building is as such that the remaining two terraced properties should remain well integrated with the new building.
- 3.3 The upper and lower basement and ground floors are proposed for a range of B1 employment uses, providing 2146 m² floorspace over these three floors. This represents an almost like for like replacement of the current internal employment space of approximately 2250 m² and equates to a loss of only 104 m² of employment space. The proposed new employment floorspace will also be of a more efficient layout and higher standard than the existing, enabling and ensuring that a flexible range of employment uses are retained on the site. The proposed layout will allow for each floor to be let to separate tenants or taken as a whole. The employment provision will operate as stand-alone units, separate from the student accommodation, with no facilities being shared. Separate bicycle storage and facilities for cyclists to shower and change will also be provided.
- 3.4 The student accommodation provides 163 en-suite study rooms with cooking facilities, totalling 4310 m². The study rooms are 17m² in size, with the exception of 18 slightly larger rooms that will be suitable for wheelchair users. Each unit of accommodation will comprise of a single bed space, kitchen area and shower room.
- 3.5 Three Japanese gardens will form light wells and provide some outdoor space for the business users within the upper and lower basement floors. A social space and roof top terrace is provided on the seventh floor for residents of the student accommodation.
- 3.6 The accommodation is laid out on each floor as follows:
- Lower Basement Floor: 587 m² of B1 employment space will be located on this floor, with two small Japanese gardens located within this, to increase natural light and ventilation. The employment space extends west under the forecourt at the rear of the building. The plant room will be also located here, housing the biomass boiler with its associated fuel storage. In addition, a laundry, screening room and ventilated refuse storage will be located here, as will secure storage for 86 bicycles to serve the student accommodation and in line with Transport for London standards.

- Upper Basement Floor: the majority of the upper basement floor is taken up with 1073 m² of B1 employment space. This will be space that can be divided up to respond to market needs. A Japanese garden is also located in the north-west corner of this floor in order to provide increased light and natural ventilation for the business users. Also included are toilet and shower facilities for the business users.
- Ground Floor: the majority of the ground floor is taken up by 486 m² of B1 employment space, split across the two sides of the building, which will be suitable for a range of employment uses, including light industrial, as is currently the case. The main entrances to the site are also located on this level, with separate entrances for students and business users. Wide doors have been provided at this level to provide access to the employment space, as is also seen in the existing provision. The ground floor features two separate corridors in the centre, providing access to the separate lifts and stairwells, where access can be gained to all levels, and to the rear of the building.
- First Floor: there are 24 student accommodation units located at this level, including one wheelchair accessible unit. A storage space is also located on this floor. The proposed development, at this level, is set back in the south-east corner of the rear of the building.
- Second – Sixth floors: there are 25 student accommodation units located at each of these levels, including two wheelchair accessible units on each level.
- Seventh Floor: there are 14 units located at this level, including seven wheelchair accessible units. In addition, a social space and terrace for use by the students is provided. The building is set back at the front at this level, to reduce the overall bulk of the proposed development and its impact on the neighbouring properties.
- The scheme incorporates a green roof and a biomass energy system. Further details can be found in the Energy Statement submitted with this application.

- 3.7 The cycle parking within the scheme includes 86 spaces in a secure and covered storage area, for use by students and located on the lower basement floor. This is accessible via the lifts and a specially designed staircase incorporating bicycle ramp, which are proposed to be of an adequate size to easily fit a bike within them. There are also 24 cycle parking spaces provided for employees at the rear of the building under secure cover. Cycle parking is in line with Camden's standards as discussed further within the Transport Statement submitted with this application.
- 3.8 A rubbish storage area is located on the lower basement floor and will house 12 x 1100 litre Eurobins for both recyclable and non-recyclable waste, plus a compactor. This is located away from the residential units and the street. Adequate ventilation and access to the store will be provided. The level of waste storage and the waste strategy is compliant with Camden Planning Guidance. Further information on this can be found in the Refuse Strategy within the Transport Statement.
- 3.9 The site is within close proximity to a number of higher education institutions, including City & Islington College, the Royal Veterinary College in Camden, the University of Westminster, University College London, London Metropolitan University, the London School of Economics, the London Business School and the Royal Academy of Music.

- 3.10 It is proposed that the new student accommodation will serve one of the above educational institutions during term-time. A preliminary institution has already been identified, however, it is not possible to identify the name of this institution at this stage due to commercial confidentiality. It is advised that this can only be identified following a grant of planning permission for the site. During non-term time, other educational institutions are forecast to use the development. Such matters will be progressed further when the relevant institution has been confirmed.

Design Solution

- 3.11 The proposed design draws elements of the existing local context and the existing old piano factory building. The framing element of the west and north elevations reflect the adjacent houses and the fenestration pattern of the principal elevation is largely similar to the existing. The terracotta louvered screen is intended to reflect the proportional system of the surrounding historic terraces, whilst maintaining the tight knit urban character. Where possible, materials have been reused in order to reflect the site's context and prevailing style.
- 3.12 Further information on the design of the scheme can be found in the Design and Access Statement, prepared by John Pardey Architects.

Scheme Benefits

- 3.13 It is recognized within both the London Plan and the London Borough of Camden's Unitary Development Plan that there is a requirement for additional student accommodation within London. The lack of demand for B1 office space is recognised, as is the need for a balanced mix of uses and best use of urban land, particularly in easily accessible areas such as this (with a PTAL of 5). The proposed development therefore addresses both the identified need for student accommodation and the understanding of a reduction of demand within the office market, therefore leading to a more sustainable use of the site.
- 3.14 The proposed development offers a number of significant planning and other key benefits. These are summarised below:
- Redevelopment of a relatively under-utilised brownfield site, in a location highly accessible by public transport.
 - Development of a modern, high quality sustainable building, with a high quality design that respects and complements its surroundings.
 - The provision of much needed student accommodation, which will make an important contribution towards both London-wide and the borough's housing needs. This includes increasing total stock and also easing local pressure on other forms of housing for student accommodation.
 - Provision of improved quality, sustainable employment space, offering flexibility for a range of business types and sizes.

4 Pre-Application Advice

- 4.1 The original pre-application meeting took place on 30th May 2008 with planning officer Jenny Fisher. At this meeting, a number of issues were raised by Camden Council. Additionally, further advice was sought on the revised designs of the proposal, with two options proposed. Comments on this were received from Jenny Fisher on 4th February 2009.
- 4.2 The latest proposal has taken account of the issues raised and the substantially revised design aims to reflect the most recent advice given by officers. For clarity, the key issues raised in this meeting in relation to the original 22 storey town scheme are detailed below:

Scale and Massing Considerations

- 4.3 It was noted in the pre-application meeting, that the original design for a 22-storey tower was unacceptable in principle and could not be supported. No further comments were made regarding the design of the building. It was further advised that a building similar in scale to the existing building would be more likely to be permitted. The design of the building has therefore been amended significantly, reducing the height of the proposed development to eight storeys with the final top storey being set back to further reduce the bulk and impact.
- 4.4 It was also acknowledged within the pre-application meeting that although the Council would prefer the original buildings to be retained, since the site is not in a conservation area, there is no clear policy that secures their retention.

Design

- 4.5 Feedback was received from officers on two design options for a revised scheme. It was recommended that number 12 Belmont Street be retained as a terraced property, so as not to leave number 14 isolated and this has now been incorporated within the revised designs.
- 4.6 It was noted that there was a preference for the design option that breaks up the bulk of the building most successfully by providing more accentuation over different floors. It was also noted that the residential character of the design was preferred. Additionally, the recommendation that a palette of materials that reflects the neighbouring buildings should be used.
- 4.7 The preferred design option has now been further developed with substantial refinement to the principal elevation to take into account the vertical order of the surrounding historic terraces. Reclaimed brick has also been used more extensively to reflect the existing and neighbouring buildings.

Natural Environment

- 4.8 It was noted within the pre-application meeting that swift bricks should be incorporated into the design of the new building at a north-east aspect. Additionally, details of any landscaping for the site should be provided and, in particular, details of the green roof including reasons for its

management and maintenance. As stated within the Sustainability Assessment, provision for both bat and bird boxes will be provided where necessary, in line with Camden's Planning Guidance. Further details of the green roof can be found within the Sustainability Assessment, and details of landscaping are shown in the submitted drawings.

- 4.9 It was also requested that details of how Sustainable Urban Drainage Systems (SUDS) will be incorporated into the design are to be submitted. As detailed within the submitted Sustainability Assessment, SUDS are to be included within the proposal in the line with the London Plan.

Amenity

- 4.10 It was noted at the pre-application meeting with officers that a daylight study would be required to establish whether or not the proposed development complies with BRE standards and to ensure that there would not material loss in amenity resulting from the development. A daylight/sunlight study has been completed and is submitted with this application, demonstrating no unacceptable loss of amenity resulting from the development.
- 4.11 Additionally, it was requested that all external plant must comply with the Council's noise levels to ensure no loss of amenity will result by virtue of noise or vibration nuisance. The Noise Assessment submitted with this application has considered the proposals in relation to neighbouring properties and concluded that there will be no loss of amenity in terms of noise nuisance, and that the plant will operate at 5dB below existing background noise levels to meet LB Camden's requirements.

Sustainability

- 4.12 The pre-application meeting raised the requirement for a BREEAM assessment to be submitted with the application. This has been completed and is submitted with this application in the Sustainability Assessments. It also notes that Lifetime Homes standards are not required to be met for student accommodation
- 4.13 It was noted in the pre-application meeting that the Sustainability Assessment should demonstrate improvement of site ecology and attenuation of water run-off as far as possible. There should also be consideration of energy saving and the potential for renewable energy across the scheme. Given the size of the development, it was noted that it would be expected that the energy requirement of the development is calculated, as well as the potential for energy efficiency measures, and additionally that on-site renewable energy generation should be targeted at least 10% of residual requirements. This has been completed, as detailed within the submitted Sustainability Assessment and Energy Statement.

Servicing and Access

- 4.14 The applicant was advised at the pre-application meeting that, given the high PTAL rating of the site, that the development should be car-free. Further, high quality cycle parking would be expected to be provided within the development, to comply with the Council's parking standards. Additionally, a Transport Assessment, Travel Plan, Construction Management Plan and Servicing Management Plan would be required. A full Transport Statement, Travel Plans

for both uses in the building and Construction Management Plan have been prepared and are submitted with the application. A Servicing Management Plan will be provided as part of the S106 obligations.

5 Planning Policy Context

5.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires any planning application to be determined in accordance with the development plan, unless material considerations indicate otherwise. The statutory development plan coverage for the site application comprises the London Plan (consolidated with alterations since 2004) (2008) and Camden's Replacement Unitary Development Plan (UDP) (adopted June 2006).

5.2 In addition, national policy guidance notes are material considerations.

National Planning Policy Guidance

PPS1: Delivering Sustainable Development

5.3 The key objective of PPS1 is to deliver sustainable development through the planning system, in order to ensure a better quality of life for everyone.

5.4 Paragraph 16 notes that:

'Development plans should promote development that creates socially inclusive communities, including suitable mixes of housing.'

5.5 Further to this, it states that development plans should:

'take into account the needs of all the community'

5.6 The importance of the provision of sufficient, good quality new homes, including an appropriate mix of housing, is noted within paragraph 23. This is with the aim to ensure that everyone has the opportunity of a decent home.

5.7 Paragraph 27 notes the importance of mixed-use communities, stating that:

'Policies should promote mixed use developments for locations that allow the creation of linkages between different uses and can thereby create more vibrant places'

5.8 Additionally it notes that they should:

'Promote communities which are inclusive, healthy, safe and crime free, whilst respecting the diverse needs of communities and the special needs of particular sectors of the community.'

5.9 PPS1 also notes the importance of design within new development, stating that:

'Good design ensures attractive usable, durable and adaptable places and is a key element in achieving sustainable development.' (paragraph 33)

5.10 It also notes, within paragraph 34, that good design should contribute positively to making places better for people and that design that fails to take the opportunities available for improving the character and quality of an area should not be accepted.

- 5.11 It states that high quality and inclusive design should be aim of all those involved in the development process and this should be integrated into the existing urban form and the natural and built environments (paragraph 35).
- 5.12 The proposed development meets the objectives of PPS1 by:
- Delivering a high quality development that integrates well into its surroundings and more efficiently uses previously developed land;
 - Providing sustainable development close to public transport; and
 - Providing higher density and mixed-use development, thus promoting sustainable living.

PPS3: Housing

- 5.13 A key objective of PPS3 is to ensure that housing delivery is achieved through a responsive approach to land supply at the local level and that a commitment is shown to affordability and supply of housing in all communities. The guidance also promotes the:
- 'a flexible and responsive supply of land – managed in a way that makes efficient and effective use of land, including the re-use of previously developed land, where appropriate' (paragraph 10)*
- 5.14 It is noted within paragraph 12 that:
- 'Good design is fundamental to the development of high quality new housing, which contributes to the creation of sustainable, mixed communities.'*
- 5.15 There are a number of factors listed within paragraph 16 that are expected to be considered when assessing the design quality of housing. In particular, there is note of the fact that developments should be well integrated with the neighbouring buildings in terms of scale, density, layout and access and additionally, that it facilitates the efficient use of resources.
- 5.16 With regard to the location of housing, it is noted that housing should be developed in locations that:
- 'Offer a range of community facilities and with good access to jobs, key services and infrastructure.'* (paragraph 36)
- 5.17 It also goes on to say that the priority for development should be previously developed land.
- 5.18 The proposed development meets the objectives of PPS3 by:
- Offering the opportunity to improve the supply and choice of low-cost housing in the borough, on previously developed land;
 - Relieving the demand for HMOs and promoting sustainable and safe communities; and
 - Reflecting the current demand and predicted future growth for student accommodation.

PPG4: Industrial, Commercial Development and Small Firms

- 5.19 The key objective of PPG4 is to encourage continued economic development in a way that is compatible with environmental sustainability.
- 5.20 The consultation paper for PPS4: Planning for Prosperous Economies was published in May 2009. PPS4 is planned to update PPG4 amongst other national policy documents, to further promote economic sustainability and create a balance between economic, environmental and social factors whilst continuing to deliver stability, jobs and growth.
- 5.21 Policy EC4 within this notes that local authorities should retain a flexible approach within policies to the supply and use of land. It is also stated within the draft statement that LPAs should make the most efficient and effective use of the land and buildings, and should take into account changing working patterns and the need for policies that reflect local circumstances.
- 5.22 The proposed development meets the objectives of PPG4 and the draft PPS4 by:
- Responding to the changing economic conditions by providing a more economically viable and economically sustainable use on the site.

PPG13: Transport

- 5.23 PPG13 seeks sustainable development patterns that minimise the need to travel and, in particular, that reduce dependency on the private car. New housing development should facilitate more walking and cycling and the use of public transport, through the location of housing in proximity to local services, local amenities and jobs.
- 5.24 With particular reference to housing development and transport, it is noted that the priority areas for housing should involve the re-use of previously developed land and buildings within urban areas. Accessibility to jobs, shops and services by modes other than the car should also be considered (paragraph 14).
- 5.25 New developments should help to create places that connect people sustainably and the use of sites that are most accessible and close to major transport interchanges should be maximised. Design and safety is also important in relation to this. In paragraph 29 it is stated that:
- 'When thinking about new development and in adapting existing development, the needs and safety of all the community should be considered from the outset.'*
- 5.26 The proposed development meets the objectives of PPG13 by:
- Promoting sustainable and car-free transport patterns; and
 - Promoting intensification of use in an area easily accessible by public transport.

PPG15: Planning and the Historic Environment

- 5.27 PPG15 sets out the government's guidance on historic buildings, conservation areas and other elements of the historic environment. Guidance of these issues is relevant to this development, due to the current building's historic nature and the site's proximity to conservation areas and listed buildings.

5.28 PPG15 recognises that although there is a commitment to the preservation of the historic environment, it cannot in practice be preserved unchanged (paragraph 1.3).

5.29 Paragraph 2.12 confirms that local planning authorities should pay special attention to the desirability of preserving and enhancing the character of a conservation area, by ensuring that development makes a positive contribution to the area's character or appearance, or alternatively leaves the area's character and appearance unharmed.

5.30 With regard to new buildings in historic areas, it notes that:

'The design of new buildings intended to stand alongside historic buildings needs very careful consideration. In general it is better that old buildings are not set apart, but are woven into the fabric of the living and working community. This can be done, provided that the new buildings are carefully designed to respect their setting, follow fundamental architectural principles of scale, height, massing and alignment, and use appropriate materials. This does not mean that new buildings have to copy their older neighbours in detail: some of the most interesting streets in our towns and villages include a variety of building styles, materials, and forms of construction, of many different periods, but together forming a harmonious group.' (paragraph 2.14)

5.31 It is noted within paragraph 6.2, that:

'the pattern of roads and open spaces and the views they create within historic townscapes may be as valuable as the building'

5.32 The proposed development meets the objectives of PPG15 by:

- Proposing a design that well integrates with the surrounding buildings; and
- Proposing a design that promotes a sustainable, varied and interesting streetscape.

PPS22: Renewable Energy

5.33 The key principles of PPS22 are to promote the increased development of renewable energy resources and to facilitate renewable energy developments.

5.34 Regional planning bodies and local planning authorities should recognise the full range of renewable energy sources, their differing characteristics, location requirements and the potential for exploiting them subject to appropriate environmental safeguards.

5.35 PPS22 notes that local planning authorities should consider the opportunity for incorporating renewable energy projects in all new developments and such schemes should be encouraged through positively expressed policies in local development documents.

5.36 The proposed development meets the objectives of PPS22 by:

- Promoting and incorporating renewable energy as an intrinsic part of the design of the development.

Regional Planning Guidance

The London Plan: Spatial Development Strategy for Greater London (consolidated with alterations since 2004) (2008)

- 5.37 A key objective of the London Plan is to ensure that London's growth can be accommodated within its boundaries, and that the most sustainable and efficient use of space is encouraged. An urban renaissance is encouraged, through higher density development and intensification in line with public transport. Within policy 2A.1 it is stated that there is support for:
- 'Optimising the use of previously developed land'*
- 5.38 And:
- 'Taking account of the suitability of sites for mixed use development and the contribution that development might make to strengthening local communities and economies'*
- 5.39 The London Plan notes, with regard to London's population, that
- 'people moving to London tend to be young adults, such as students or first time employees (paragraph 1.38)'*
- 5.40 Policy 3A.4 suggests that new developments should offer a range of housing choices and should take into account the housing requirements of different groups, such as students. Policy 3A.25 specifically notes that one of the ways in which the needs of the education sector should be addressed is by
- 'supporting the provision of student accommodation'*
- 5.41 Policy 3A.6 also notes that:
- 'provision of purpose-built student housing adds to the overall supply of housing and may reduce pressure on the existing supply of market and affordable housing'*
- 5.42 With regard to office development, it is noted in paragraph 3.142 that:
- 'There is scope to consolidate future office development on appropriate, competitive locations in ways that support sustainable development objectives and still provide adequate capacity to meet future business requirements'*
- 5.43 Additionally, policy 3B.3 states that:
- 'In strategically specified locations identified in Para 3.148 beyond these areas, mixed use development and redevelopment should support consolidation and selective rejuvenation of office provision in line with Policy 3B.2 and broader objectives for suburban renewal'*
- 5.44 With regard to tackling climate change, policy 4A.7 of the London Plan, regarding renewable energy, states that developments must achieve a reduction in carbon dioxide emissions of 20% from on site renewable energy generation.

5.45 With regard to the design of buildings, policy 4B.1 notes that boroughs should seek to ensure that developments:

'respect local context, history, built heritage, character and communities'

5.46 And that they:

'provide for or enhance a mix of uses'

5.47 Further to this, paragraph 4.101 recognises that London is highly diverse and constantly changing, but seeks to ensure that developments show an understanding and respect for existing character, including urban form, movement patterns and historical context.

5.48 With regard to the design of mixed-use developments, paragraph 4.106 notes that developments should create or enhance a mix of uses within large buildings, which will contribute to the vitality and safety of areas.

5.49 The site falls within the North London sub-region of the London Plan. One of the priorities of this area is to ensure that the substantial expansion of population expected in North London is accommodated in sustainable communities.

5.50 Within the London Plan, there is the aim for 65 000 more homes to be accommodated in the North London sub-region by 2016.

5.51 The proposed development meets the objectives of the London Plan by:

- Providing opportunity for growth in London through intensification of use and higher density development; and
- Providing a range of housing choices and reflecting the requirement to support the need for student accommodation.

The Central London Sub Regional Development Framework

5.52 As the Sub Regional Development Framework (SRDF) was produced prior to the further alterations to the London Plan, it means that within the SRDF the site falls into the Central London area. It is noted that although the further alterations to the London Plan have altered the sub-regional groupings, the information contained within the SRDFs will still remain valuable.

5.53 With regard to the Central London office market, paragraph 49 notes that, as a whole capacity is likely to be more than adequate. Paragraph 153 further notes that there is sufficient office capacity to meet future needs.

5.54 Paragraph 293 states that mixed uses are likely to become more prevalent in the region and notes that these will often provide a financially viable approach that will contribute to the objective of sustainable communities.

5.55 The proposed development meets the objective of the Central London SRDF by:

- Recognising demand for student accommodation in the Central London area.

Unitary Development Plan

- 5.56 The replacement Camden Unitary Development Plan (UDP) was adopted in February 2006. The proposals map of the UDP confirms that the site is not allocated for a specific purpose. The policies of the UDP relevant to the application can be summarised as follows:

Sustainability

- 5.57 Policy SD1 encourages development to meet the highest standards of access and inclusion. With regard to this, paragraph 1.12 states:

‘The creation of inclusive environments recognises and accommodates differences in the way people use the built environment and enables everyone to participate in mainstream activities equally’

- 5.58 Policy SD3 states that the council will seek a mix of uses in development, including a contribution to the supply of housing. It notes that, when considering the mix of uses, regard will be had to, amongst other things ‘the need and potential for continuation of an existing use’ and ‘the impact of the balance of uses proposed on the area’s character, diversity and vitality.’

- 5.59 Policy SD6 states that:

‘The council will not grant planning permission for development that it considers causes harm to the amenity of occupiers and neighbours’

- 5.60 Policy SD9, regarding resources and energy, sets out the requirements for the use of energy resources within development. It states that the Council will seek developments to conserve energy and resources through designs for energy efficiency, renewable energy use, optimising energy supply and the use of recycled and renewable building materials. Paragraph 1.64 of the supporting text confirms that developments should incorporate renewable energy production equipment to provide at least 10% of predicted energy requirements.

- 5.61 Most recently the London-wide renewable energy target has been increased to 20% (see paragraph 5.44).

- 5.62 The proposed development meets the Sustainability objectives of the UDP by:

- Providing good quality and inclusive accommodation;
- Providing accommodation that does not harm the amenity of either its occupiers or its neighbours; and
- Including measures to promote resource and energy efficiency.

Housing

- 5.63 The housing chapter confirms that housing should be a priority use within the borough.

- 5.64 Policy H1, paragraph 2.8 , states that:

'The council will look favourably on schemes for new residential development, new build, conversions and extensions, that provide accommodation of an acceptable standard.'

5.65 Additionally, policy H1 notes that the Council will seek to contribute to the government's target of the development of 60% of additional housing on brownfield land.

5.66 Policy H2, paragraph 2.19, notes that although student accommodation does not come within the definition of affordable housing, it does meet a specialist housing need and is thus exempt from the requirements of policy H2. This is provided that the housing costs significantly less than the cost of general market housing in Camden and that it meets a defined specialist need and cannot subsequently be let or sold as general market housing.

5.67 Policy H3 notes that:

'The Council will resist proposals that lead to a net loss of residential floorspace, except if the loss is to provide small-scale health care facilities that are needed locally and cannot be provided on an alternative site.'

5.68 It additionally states that where a development would involve the net loss of two or more residential units, planning permission will not be granted unless it creates large affordable housing units, large housing units in part of the Borough with a relatively low proportion of large dwellings or the loss is necessary to bring sub-standard units up to an acceptable standard.

5.69 Paragraph 2.30 further details this by stating that:

'The retention of permanent residential floorspace in all uses (including dwellings in Use Class C3, residential care homes in Use Class C2, sheltered housing, houses in multiple occupation, and nurse and student accommodation that provides for stays of over 90 days) will help to provide a range and variety of accommodation.'

5.70 Further to this, paragraph 2.36 states that:

'Where development involves the demolition or other loss of housing, the Council will require replacement dwellings of a similar or greater number to be provided. The standard of the new dwellings should be same or better than those replaced.'

5.71 Policy S6 states that:

'The Council will seek to secure and protect a range of housing, in terms of size and type, to meet London-wide and local needs and seek housing designs that are accessible to all, including people with mobility difficulties.'

5.72 Policy H7 encourages all new housing developments to be accessible to all. This includes ensuring that at least 10% of dwellings are accessible or easily adaptable for wheelchair users. Although adherence to 'Lifetime Homes' standards is encouraged, it is noted that it is not compulsory for purpose-built student housing to adhere to these standards, as it does not fall into use class C3.

5.73 Policy H6 notes that houses in multiple occupation (HMOs) are a valuable source of accommodation in the borough, but there is a falling number of these which is leading to a

reduction in supply of low-cost housing and therefore reducing the housing choice available in the borough to those on low incomes.

5.74 The proposed development meets the Housing objectives of the UDP by:

- Offering the opportunity to improve the supply and choice of low-cost housing in the borough;
- Relieving the demand for HMOs and promoting sustainable and safe communities; and
- Promoting housing development that is accessible to all.

Design & Landscaping

5.75 Policy B1 states that development should respect its site and setting, be safe and accessible to all, be sustainable by promoting energy efficiency and seek to improve the attractiveness of an area and not harm its appearance or amenity.

5.76 Design should take into account the height, bulk, scale and design of neighbouring buildings, building lines and plot sizes in the surrounding area and the existing pattern of routes and spaces.

5.77 Paragraph 3.8 states that

'Innovative and imaginative designs can play an important role in the enhancement and renewal of the built environment'

5.78 With regard to integration of new development, paragraph 3.9 states that characteristics of a site, local distinctiveness and the wider context should be considered, in order to achieve high quality development which integrates into its surroundings. Paragraph 3.12 additionally states that development should respect the local area and adjoining buildings.

5.79 Policy B7 also notes that the council will not grant planning permission for development outside of a conservation area, although visible from it, and where it is considered to harm the area's character, appearance or setting.

5.80 The proposed development meets the Design objectives of the UDP by:

- Promoting design that takes into account the height, bulk, scale and design of neighbouring buildings;
- Providing a locally distinctive building that achieves high quality design and integrates into its surroundings; and
- The site is not within a conservation area and will not have an adverse impact on any of the surrounding conservation areas.

Natural Environment

5.81 The objective of policy N4 is to ensure that public open space deficiency is not created or made worse and therefore, the Council will only grant planning permission where an appropriate

contribution to the supply of public open space is made. Additionally, other developments will be encouraged to contribute to the supply of open space.

5.82 Policy N4 specifically notes that developments over 1000 m² that would increase the resident population of the area, are considered to be likely to lead to an increased use of public open space.

5.83 Policy N5 notes that:

'the Council will expect development schemes to have considered conserving and enhancing biodiversity, including by creating wildlife habitats'

5.84 Paragraph 4.1 notes that development can provide an opportunity to enhance biodiversity by providing or enhancing wildlife habitats and by greening the environment. It is stated that new or enhanced wildlife habitats can be created through the use of green or brown roofs and the use of imaginative planting.

5.85 The proposed development meets the Natural Environment objectives of the UDP by:

- Providing an internal green spaces and additional S106 contributions towards open space provision within the borough; and
- Enhancing biodiversity in the area through the use of green roofs and imaginative landscaping and planting where appropriate.

Transport

5.86 A key aim of the UDP, as stated in policy H9, is to reduce the need to travel, by promoting development that is easily accessible by public transport and that encourages cycling and walking. This is further supported by policy T1, which encourages sustainable transport development.

5.87 Policy T2 notes that the council will only grant planning permission for development where it considers that all forms of travel associated with the development can be accommodated within the capacity of existing or planned transport provision. Further to this, policy T4 states that the council will use planning conditions and planning obligations, where generated transport needs cannot be met by existing or planned transport provision, in order to ensure the development will provide for the public transport needs it generates.

5.88 Policy T3 details the requirements for secure cycle parking within the borough and states that it will only grant permission for developments that make satisfactory provision for pedestrians and cyclists.

5.89 Car-free housing is encouraged, and policy T8 states that:

'The Council will grant planning permission for car free housing in areas of on-street parking control'

5.90 Policy T12 discusses works affecting highways and notes that the council will only grant consent to developments that affect highway land, where it considers that the proposals

prioritise road safety, maximise travel benefits, minimise harm to the environment and avoid harm to the road network.

5.91 The proposed development meets the Transport objectives of the UDP by:

- Promoting sustainable transport patterns and car-free housing.

Economic Activities

5.92 Policy E2 states that:

'The council will not grant planning permission for development that involves the loss of business use on a site where there is potential for that use to continue'

5.93 However, it is also demonstrated within this policy that B1(a) office uses have a lower priority than B8 or B1c light industrial uses, by stating:

'Where the Council considers that the site does not have potential for continuation of the existing business use, preference will be given to maintaining the site in an alternative business use, with a higher priority to retention of flexible space for B8 or B1 light industry than to provision of B1(a) Offices'

5.94 It is further noted in paragraph 7.13 that there is a limited amount of good quality employment sites within the borough, with the exception of offices.

5.95 Paragraph 7.17 states that:

'The need to retain business sites will be balanced against the availability of alternative sites. The prospects for productive re-use of a site will also be considered. In doing so, the viability of development for business purposes, the demand for such activities, and the supply of alternative sites will be taken into account'

5.96 With regard to proposing non-business uses, paragraph 7.19 states that the applicant should demonstrate that the site no longer has potential for alternative business uses, but submitting evidence of a thorough marketing exercise sustained over at least two years.

5.97 However, it is also noted within paragraph 7.22 that:

'There is a large stock of office floorspace (Use Class B1a) in the Borough, and where this is surplus, it may not be suitable for conversion to alternative employment uses. Consequently, as an exception to the general approach in E2, proposals for other uses of older office premises will be encouraged in appropriate cases if they involve the provision of permanent housing (and in particular affordable housing) and/or community uses, such as an extension to an existing educational facility.'

Local Development Framework

5.98 As part of the review of its adopted UDP, Camden has commenced production of its Local Development Framework (LDF).

Core Strategy

- 5.99 The 'Preferred Options' document was published for consultation on November 2008 and a draft of the Core Strategy is envisaged to be published in October 2009. The preferred options document has been produced in line with the Camden Community Strategy 2007-2012, which sets out the shared vision and strategy for the Council and its partners. The document sets out the preferred strategy options for Camden, including growth within Camden; housing and affordable housing; environment; and sustainability. The option stated as preferred option is the one that will best achieve the community strategy's visions – a sustainable Camden that adapts to a growing population, a strong Camden economy that includes everyone, a connected Camden community where people lead active healthy lives, and a safe Camden that is a vibrant part of our world city.

Development Policies DPD

- 5.100 The 'Preferred Options' for this for document was also published for consultation November 2008, with a draft of the final document envisaged to be published in October 2009. The document supports the Core Strategy setting out the additional planning policies that the Council will use when determining planning applications. The current need for student housing in Camden is acknowledged in this document.

6 Analysis of Planning Issues

Land Use Implications

Principle of Student Accommodation

- 6.1 Key priorities of the Camden UDP, national and regional planning guidance are to encourage further housing development. The proposed development will provide accommodation for a user group that currently has a particular need in the area and it will provide this affordably. Additionally, this provision will be provided on a brownfield site, in line with government guidance and as encouraged within policy H1 of the UDP.
- 6.2 The student population in London is growing and Camden has the highest proportion of students in London, at 11%¹. The London Plan states that an increasing number of students are moving to London (paragraph 1.38) and that student accommodation should be supported (policy 3A.22). Private sector provision remains at only 3% of the full-time student accommodation market in London². Further to this, the average provision of beds within university halls is only 18% in London and therefore the majority of students are living in Houses of Multiple Occupation (HMO). There is therefore significant demand for further accommodation and there remains a 'supply-demand imbalance'².
- 6.3 As PPS3 states, housing development should reflect future demographic trends. The King Sturge study shows that there has been rapid growth in both full-time student numbers and in overseas students over the past five years and this is expected to continue to increase². Specifically in relation to the design of the student accommodation, the provision of self-contained units reflects the changing lifestyles and needs of modern students, who prefer to have complete control and availability of bathroom and kitchen facilities. This is particularly important to overseas students, of which there are many within London universities. Evidence of the effect termed 'de-studentification' has been found in recent research completed at Brighton university³, whereby students are gradually moving away from the private rented sector in preference for purpose built accommodation.
- 6.4 It is recognised that policy H8 requests that a mix of units of varying size and tenure are provided within new developments. However, it also states that this will be dependent on the requirements of special needs housing and the mix and size of units that are best suited to the site conditions and the locality. Based on this, it is felt that the proposed mix of all 'studio-style' units is appropriate for this development. It is also preferable to locate student accommodation in one single development, where it will have less impact on the private housing market and on the structure of communities than shared housing.

¹ London Borough of Camden (2007) *Camden Profile 2007* [online] available from: http://www.camden.gov.uk/ccm/cms-service/stream/asset/?asset_id=660197 accessed on 8th April 2009

² King Sturge (2008) *UK Student Accommodation Market 2008* Appendix 1

³ Smith, D.P. and Holt, Louise (2007) *Studentification and 'apprentice' gentrifiers within Britain's provincial towns and cities: extending the meaning of gentrification*. Environment and Planning A, 39. pp. 142-161

- 6.5 Purpose-built student accommodation reduces any further pressure to convert traditional family houses into HMOs, which can often lead to less sustainable communities and transient populations in quieter, predominantly residential areas. It is recognised as a problem by established Higher Education Institutions in the borough, who continue to have a pressing requirement to meet the needs of their students. A significant amount of HMOs are currently occupied by students. Additionally, according to Camden's Housing Needs Survey⁴, around 80% of students in the borough reside in private rented accommodation.
- 6.6 Although policy H6 states that there is currently a shortage of HMOs in the borough, the proposed development will provide an alternative to HMOs for students. This will both free up HMOs to other resident groups, thus increasing the supply of affordable housing, and will reduce the pressure to convert more traditional family homes into HMOs.
- 6.7 Recent government guidance notes the problem of 'studentification', in relation to students residing in HMOs⁵. HMOs make an important contribution to the private rented sector, but are not without their problems, particularly when they are found in high concentrations. They can result in unintended friction with the local community and often other negative socio-economic impacts. One of the government's recommended examples of good practice in addressing the issues surrounding HMOs is the provision of purpose built student accommodation. Purpose built student accommodation reduces the risk of unplanned student enclaves developing within HMOs and can also help to reduce the negative impact of high levels of HMOs upon the local community. With this government guidance in mind, it is felt that this provision proposed is particularly appropriate.
- 6.8 Policy E2 states that where there is a loss of existing business use (for which justification is provided at paragraph 6.18), the Council will seek a change to permanent residential uses and, in particular, affordable housing. Policy H2 notes that although student accommodation does not fall within the meaning of affordable housing, it meets a specialist housing need. Additionally, with regard to the permanency of student accommodation, it is felt that the provision of this is sufficiently permanent, with the proposal allowing for students to stay permanently within their residence for nine months of the year. It is only during the summer months that there will be a change of resident occupying for the summer holiday (non-term) period. On this basis, the proposal is considered to be broadly in line with the recommendations of policy E2.
- 6.9 The proposed development is located close to public transport links. PPS3 encourages housing to be located in sustainable locations and this proposal will not only promote travel by public transport or on foot or bike, but will also enhance and add to the mixed community within the area.
- 6.10 In formulating the scheme, the applicant has held initial discussions with higher education institutions regarding potential occupation. Agreement will be secured upon the granting of planning permission.

⁴ Fordham Research (2008) *London Borough of Camden Housing Needs Survey Update 2008* [online] available from: http://www.camden.gov.uk/ccm/cms-service/download/asset/?asset_id=1176419&bcsi_scan_F6892CABA15785B4=INiafPJJICGxBtV3g8IXmEAAAAYtkEX:1 (accessed on 6th April 2008)

⁵ DCLG (2008) *Evidence Gathering – Housing in Multiple Occupation and possible planning responses – final report*. [online] available from: <http://www.communities.gov.uk/documents/planningandbuilding/pdf/evidencegatheringresearch.pdf> (accessed on 6th April 2009)

10 Belmont Street

- 6.11 It is recognised that the proposal results in the loss of one residential unit at 10 Belmont Street. This dwelling comprises a three storey four bedroom property, totalling approximately 120 m² of residential floorspace. The dwelling is therefore suitable for occupation by a family. The UDP states that where accepted, the standard of the new housing should be to the same standard or better than those replaced (para. 2.36).
- 6.12 Para. 2.30 of the UDP states that the net loss of residential accommodation and loss of potential residential development sites would undermine the aim of policy H3; to increase the amount of housing in Camden and provide a range of residential accommodation. It goes on to state that the retention of permanent residential floorspace in all uses includes student accommodation that provides stays of over 90 days in helping to provide a range and variety of accommodation. The proposed development would therefore be classified as permanent residential floorspace and will aid in providing a range and variety of accommodation.
- 6.13 The proposed development proposes the loss of the existing four bedroomed residential house at 10 Belmont Street (120 m² in total) and replacement with an increased floorspace and overall increased number of units on the site. The approximate proposed residential floorspace to be provided on this part of the site will be 221 m², incorporating 13 bedrooms. In addition to this increase in residential accommodation on this site, the quality of the residential accommodation will also be significantly improved. It has already been noted that the current standard of the residential accommodation at 10 Belmont Street could benefit from some refurbishment.
- 6.14 It is acknowledged therefore that student accommodation provides an invaluable source of accommodation within the Borough and is recognised as a form of residential accommodation, which is considered to address the loss of the dwelling. Whilst one residential unit with four bedrooms will be lost a total of 13 student rooms will be provided in its place.

Principle of Mixed Use

- 6.15 In principle, mixed use development is supported at national, regional and local levels. The development proposal is for a mixed use scheme, in line with the aims of policy SD3 of the UDP and reflecting the overarching theme of PPS1 and its desire for development that encompasses the needs of the whole community and that create more vibrant places.
- 6.16 It is felt that the proposal for a mixed use development, that includes a contribution to the supply of specialist housing in the borough, will help to increase the area's vitality around the development site, ensuring that the development is well used both throughout the day and the evening, and thus also improving safety and security.
- 6.17 A further material consideration is the London Office Policy Review 2007, which suggests that in Camden Town some office provision could be promoted as part of wider residential or residential and leisure/retail mixed use development.

Principle of Proposed Employment Use and Reduction in Employment Floorspace

- 6.18 The development proposes a change of land use at 10a Belmont Street, from Class B1 employment use to a mixed-use scheme, combining Class B1 employment uses and sui generis student accommodation. A total of 2146 m² of Class B1 employment floorspace will be provided at ground, upper and lower basement floor levels, with the design allowing for flexibility over unit space, layout and usage type. This is a reduction of 104 m² on the existing provision. However, the redevelopment of the site will lead to a more efficient use of the land in a location that is well served by public transport but which often struggles to be let. This is in line with the requirements of policy SD2 of the UDP, which seeks more efficient use of land within the borough.
- 6.19 The site is currently split into 12 units spread across the six existing floor levels, with two units per floor. These units are currently used by a variety of businesses for office use, although they have also been used for B1b uses in the recent past, and total approximately 2250 m² of space. All of the units are currently occupied but this has not always been the case. Six of the current tenants only began their occupation of the building in the past 18 months, following the departure of six previous tenants, with one of the reasons stated for leaving being the lack of flexibility and efficiency of the internal space. The units were then vacant for a period of approximately six months, in spite of a significant amount of marketing, and it was not until a reduction in price was offered, that it was possible to find an alternative tenant.
- 6.20 It is recognised that the units have not always been used as B1a and B1b spaces and that the original building was used for B1c light industrial purposes. A comprehensive review of the existing building has demonstrated that it is only those units on the ground floor that could now be suitable for B1c uses. The existing ground floor units can accommodate access for goods vehicles, have wide doors to allow access for goods and offer an open floor plan with high ceilings. Although there is a goods lift within the existing building, this can only be accessed via narrow doors at the front and rear and it is therefore not possible to effectively use this lift for goods, therefore limiting the use of the upper floors for light industrial use.
- 6.21 With regard to the ground floor provision, the proposed development will incorporate the same features as can be found within the existing building – that is high ceilings, open floor plans, wide doors at the front and rear and access for goods vehicles. This will make this space suitable for light industrial and will, in fact, increase the ground floor overall employment floorspace from 410 m² to 486 m². Therefore although the development proposes an overall reduction in employment space, it is in line with the requirements of policy E2 of the UDP by placing a focus on the retention of good quality light industrial space at the most practical levels in the building.
- 6.22 Overall, the development proposes a reduction in employment space. Policy E2 refers to loss of employment uses on sites where there is the potential for that same business use to continue. It notes that as there is a large stock of office floorspace in the borough and, as such, proposals for other uses of older office premises will be encouraged in appropriate cases, if they involve the provision of permanent housing or community uses. It also allows a change to residential when an office use (Class B1a) is no longer required.

6.23 In response to the points set out within policy E2, with regard to loss of employment use, the development adheres to the requirements of this policy, although it should be noted that the overall loss of employment use on the site is minimal, equating to only 104 m². Each of the points that policy E2 states should be considered are set out below:

- A) Whether the site is in or adjacent to the Industry Area – the site is neither located within nor adjacent to an industry area;
- B) The size of the site and whether it could potentially provide for servicing by large vehicles – the site is currently restricted for servicing by large vehicles. The only possibility for servicing by large vehicles is off the road at the front of the building. At the rear of the building, there is a height restriction from Ferdinand Street and the site is not accessible by large vehicles. The site is particularly restricted on upper floors, where there is insufficient accessibility for light industrial uses to operate effectively. This is demonstrated in Camden Council's decision on planning application reference 2005/5574/P, which accepts that the fourth floor of the existing building is, of the Class B1 uses, only suitable for Class B1a. However, in recognition of the fact that there is a preference for light industrial uses to continue at the site, features on the ground floor that allow for this space to be used for light industrial purposes have been retained and an overall increase in this floorspace at ground floor level is proposed;
- C) Whether the site is particularly suitable for small firms – the site is suitable for small firms and therefore a significant proportion of employment space is proposed to be retained on the site, to allow for the business of these small firms to continue to occupy the building. The space will be made more efficient and flexible, allowing for an improved use of the space;
- D) The accessibility of the site by public transport and by service vehicles – the site is easily accessible by public transport with a PTAL rating of 5. As is noted at point B) above, the site is not easily accessed by large vehicles. Where a service vehicle does need to access the site, the proposed development will promote access from the rear of the building, in order to promote off-street servicing. It will also have flexibility for larger vehicles to access from the front if required, such as for the proposed biomass deliveries;
- E) The relationship of the site to nearby land uses – the site is surrounded by predominantly residential land uses. It could be argued therefore that a mixed-use development in this location is more appropriate than full employment use. The proposal for a reduced level of employment on the site will lead to a reduction in predicted vehicle trip generation, as further detailed within the Transport Statement. Additionally, the proposal for student accommodation will add to the social mix of the area and the retention of a significant proportion of employment floor space allows for continued employment use at the site;
- F) The demand, supply and variety of sites that are suitable for employment uses, firstly in that particular use class, and secondly in business use in general – there is recognition within policy E2 that there is a large stock of office floor space in the borough and it is therefore felt that the reduction of this floor space to allow for the increase in provision of specialist housing is satisfactory and in line with the policy aims. This is further supported by the figures provided by Camden's Annual Monitoring Report 2007/08⁶, which indicates that 12336 m² of B1 office floor space was lost during the period and states that it:

⁶ London Borough of Camden (2008) *Annual Monitoring Report 2007/08*

'is likely to form part of a longer term adjustment in employment planning provision'
(para 10.4)

It is further noted within paragraph 9.19 of this report, that the B1 use classes are experiencing high levels of vacancy and that 33% of the vacant B1 premises can be classified as long-term vacant. Camden Town has had an oversupply of office space for a number of years now. Further to this, it is pointed out within the Central London SRDF that the Central London office market is likely to be more than adequate and the London Plan notes that there is scope to consolidate future office development. Based on this, it is felt that its conversion to a mixed-use development with a small reduction in B1 floor space, that is currently predominantly used for offices, is appropriate; and

- G) The retention of design features that enable flexible use, including use for light industry as part of schemes for the redevelopment or alteration of industrial premises for B1 purposes – the site is currently used for B1a uses. However, it is recognised that the ground floor of the development has features that would allow it to be used for B1c light industrial purposes. These features have been retained within the development, including similar floor to floor heights (2.75 metres vs 2.7 metres), provision of wide access doors and turning and parking space for goods vehicles. Additionally, space on the basement levels will be more flexibly laid out than the existing provision, allowing this space to be used in a more efficient way and without the numerous divisions which characterised the existing space. There will be flexibility for large, medium and small businesses to occupy the space, using communal WCs and shared meeting rooms to allow for improved space efficiency.

- 6.24 It is recognised that evidence has not been submitted to demonstrate that the site no longer has potential for alternative business uses, in the form of a thorough marketing exercise over at least two years, as required by policy E2. However, evidence is available to show that when employment spaces within the existing building have become vacant, it has been difficult to re-let them and that this has led to the units being left vacant for a significant period of time. This is demonstrated by the fact that there have been long vacant periods, as demonstrated within the attached tenancy schedule at Appendix 1. It has also been necessary, in order to fill the vacant office space, to offer discounted rents and short leases. When combined with the recognition within policy E2, that there is a large stock of office floor space in the borough, it is felt that the reduction of employment space is appropriate in this particular instance.
- 6.25 Although there will be a slight reduction in the overall employment floor space, it is proposed that the space be used more efficiently and thus, the difference will not be discernable in employment terms. At present, just over 200 people are employed within the building. The new development will have the capacity to employ a similar number of people, the improved design of the development allowing for this level of employment to be achieved even though the total floor space will be slightly reduced. Additionally, it will be necessary to employ additional people to manage the student accommodation element of the development, therefore leading to a predicted overall increase in the number of people employed on the site.
- 6.26 It is noted that the Camden Planning Guidance document states that, where major developments result in a loss or displacement of existing employment uses, there may be a requirement by the developer to assist with employment, training and local business initiatives via S.106 agreement. In line with this, the applicant is willing to enter into a S.106 legal agreement to recruit local labour and to buy goods and services from Camden businesses during the construction phase of the development.

- 6.27 In summary therefore, it is felt that the proposed levels of employment space are compliant with the guidance of policy E2 and will provide a more efficient use of the space within a sustainable, mixed-use development.

Character and Design

- 6.28 Belmont Street is characterised by buildings of a wide variety of styles and scales. There are a number of newer residential blocks and towers in the vicinity of the site, as well as some of the original buildings still remaining.
- 6.29 The proposed development will be of a contemporary style but will reflect and respect the original character, scale and bulk of both the existing buildings and their surroundings, as is explained in detail in the Design and Access Statement. The detailed design will reflect both the materials palette and elements of the architectural form of the adjoining buildings. The use of a terracotta external shading system will bring warmth to the façade, which is typical of the red and brown bricks used in the adjoining towers and blocks. In terms of the detailed design of the front façade, the proposal picks up on the transom bars featured in the current windows. The new building on the site of 10a Belmont Street reflects the detail of the adjoining residential blocks with their regimented fenestration pattern and light coloured strips to the bottom of the external balconies. This emphasizes the verticality of these blocks. Additionally, the proposed design will re-use the existing brick for large areas of the proposed elevations. This will ensure that evidence of the original character of the area and buildings is retained and that the new development is in keeping with its surrounding area.
- 6.30 Whilst the proposed development exceeds the height of the existing building at 10a Belmont Street by between approximately 1.6 and 3 metres (the existing building is five storeys with a roof extension built into the pitched roof, the proposed development is seven storeys high with a set back top storey), the proposed building is still respectful of the heights of the adjoining properties, such as the four storey white rendered terrace located in front of the site and Mead Close to the north.
- 6.31 The rectangular form of the new building is reminiscent of the surrounding tower blocks, particularly Mead Close. This design proposal is therefore in line with the requirements of policy B1 of the UDP, which states that development should respect its site and setting and take into account the height, bulk, scale and design of neighbouring buildings.
- 6.32 The set back top storey of the building will be in a different material to the main building to reduce the overall mass and bulk of this additional storey, ensuring the building does not appear to be top heavy and over-dominate the street scene.
- 6.33 The immediate surrounding area of the development site is much changed since it was originally built, as is detailed in section 2 of this statement. The proposed development has been designed to reflect the historical design of the existing building, but to also reflect the changes that have already taken place within the close surrounding area.
- 6.34 The proposed development will create a more efficient use of the buildings. Current costs of repair and maintenance to a building of this age are relatively high. In particular, the environmental impact of the building's continued use is significant. The proposed development will create a much more environmentally sustainable building, as further detailed from

paragraph 6.84 of this statement. Efforts have been made to retain 10a Belmont Street in its current use. However, to promote a more sustainable and efficient use of the site, requires significant changes that the existing buildings would struggle to accommodate. It is demonstrated from paragraph 6.18 that there is a reduced demand for offices within the area. In order to reflect this reduced demand and provide a development that can also help address the need for student housing, the only option is to propose a new building on the site, which will be able to function more effectively for the proposed uses than the existing one. The benefits that can be gained from changing this building's use and in promoting environmental sustainability are felt to outweigh the benefits of preserving the buildings in its current form.

- 6.35 The proposed development will broadly reflect the scale and massing of the existing building at 10a Belmont Street, as well as reflect a number of the architectural elements of the existing building. Furthermore, it will retain the existing historical pattern of roads and open spaces in the area, in accordance with the objectives of PPG15 (paragraph 6.2), which notes that it is these patterns of roads and open spaces and the view that they create that may be as valuable as the building itself.
- 6.36 Given the proposed development's proximity to three surrounding conservation areas, the design of the building has taken into account its potential impact on these areas. It is felt that the design will suitably enhance these areas and thus adheres to the requirements of policy B7, as the building will not harm the conservation area's character, appearance or setting.
- 6.37 The Regent's Canal Conservation Area boundary is approximately 100 metres south of the application site and is bounded by Chalk Farm Road to the north and the rail lines to the south. The main building of note within this area is the grade II* listed Roundhouse. Although the development site is in close proximity to this conservation area, the buildings that fall between sufficiently screen the site from it, ranging from between three and five storeys in height at the southern end of Belmont Street where it meets Chalk Farm Road. Therefore the impact that the proposed development will have on this area is marginal.
- 6.38 The West Kentish Town Conservation Area lies approximately 200 metres to the north of the site, with the boundary on the south side of Prince of Wales Road, falling just to the east of Malden Crescent. The proposed development is sufficiently screened by the buildings located between it and the conservation area, in particular the 20 storey Denton Tower. The proposed development will therefore have no impact upon it.
- 6.39 The Harmond Street Conservation Area lies approximately 200 metres to the east of the site, with its western boundary running along the west side of Harmond Street. The proposed development is sufficiently screened from the conservation area, with buildings ranging up to six storeys high on Ferdinand Street. The proposed development will therefore have no impact upon it.
- 6.40 There are two listed buildings in the vicinity of the site. The Roundhouse (Grade II*) is located on the south side of Chalk Farm Road and lies opposite the entrance to Belmont Street, approximately 100 metres south-west of the site. It is not visible from the application site due to the building that is situated between, in particular the four storey (rising to five storey) building on the corner of Belmont Street and Chalk Farm Road. Kent House (Grade II) is located approximately 100 metres to the east of the site at 1-9 and 10-16 Ferdinand Street. It is obscured by several large works buildings. In order to reach the servicing yard of the

application site however, it is necessary to pass this building. Camden's UPD policy B6 states that the Council will not grant planning permission for development that it considers would cause harm to the setting of a listed building. The route through to the servicing yard via Kent House is already used for the existing building at 10a Belmont Street and therefore the impact of the usage on this road for the new development will not be increased. Further detail on impact on the road network can be found in the supporting Transport Statement.

- 6.41 Additionally, the design of the proposed development both aims to broadly retain the scale and massing of the existing building, as well as retain an element of its historical context but within a more modern setting that is appropriate to its surroundings. It is not therefore considered that the proposals would have an adverse impact on the setting of these listed buildings.
- 6.42 The site is located adjoining a strategic view. However given that the height of the proposal building has now been reduced from 22 storeys to 7 storeys the height of the building will not exceed the development threshold and will not therefore have an impact on this viewing corridor.

Neighbour Amenity and Standard of Accommodation

- 6.43 Appropriate residential standards have been adhered to throughout the proposed development. Camden Planning Guidance (2006) (CPG) contains guidance on Class C3 residential dwelling sizes in Section 40. These are given as 32 m² for a one person dwelling. In this instance, as the proposal is not for Class C3 general needs housing but student housing, it is considered that a more flexible approach should be taken, as suggested in the guidance.
- 6.44 HMO standards are generally lower than standard residential as there is other communal space available to the occupiers elsewhere in the property. Although the proposal is not for a HMO, the standards provide a useful benchmark in terms of acceptability of the proposed student units. Therefore the minimum floorspace for this type of accommodation, where it includes its own kitchen facilities and shower room, as this development does, is 14 m². The accommodation units in this development are 17 m² and thus are well above this recommended minimum. This is supplemented by a range of communal spaces on the seventh floor and basement levels. This approach has already been accepted at the consented student accommodation development at 2-12 Harwood Street.
- 6.45 The scheme has been designed to ensure that there will be a limited effect on existing residential properties in relation to privacy and overlooking, outlook, sunlight/daylight and noise. This reflects the guidance of policy SD6, which seeks to safeguard any harm to the amenity of surrounding properties.

Sunlight/Daylight and Outlook

- 6.46 In line with Camden's Planning Guidance, the sunlight/daylight report submitted with this application assesses the impact of the proposed building on daylight and sunlight in surrounding properties. This assessment has shown that the best practice BRE guidelines for sunlight can be achieved in most locations. Best practice BRE guidelines for daylight are met in most locations.
- 6.47 With regard to the daylight availability, the vertical sky component test has been completed. All locations tested apart from three within 12 and 14 Belmont Street pass this test. Where a fail result occurs, it does not automatically follow that daylighting will be of a poor standard and will depend on such factors as room depth and the size of the windows. This can be checked by applying the Average Daylight Factor test, which shows that the impact of the development will be relatively low. It should also be noted here that the most significant impact is on the ground floor kitchen window of 12 Belmont Street. In order to avoid this impact, the design and layout of the proposed development would need to be severely compromised. Additionally, it should be noted that the existing terraced property at 10 Belmont Street only meets a similar figure on this test, given its vicinity to the existing building at 10a, and this is an existing situation, typical of dense urban areas such as this. This has not prevented the property at No.10 Belmont Street being used as an acceptable residential unit.
- 6.48 With regard to sunlight availability, six windows of all those surveyed fail the test. However, as is noted within the Daylight and Sunlight study, the windows only just face within 90 degrees of due south and had they not fallen within this angle would not have been required to be tested at all. Additionally, consideration should be made of the fact that in urban locations it is often not possible to achieve recommended levels of direct sunlight, particularly in the winter months.
- 6.49 With regard to the level of daylight to be received within the proposed development, a full assessment is not considered to be required and therefore this has not been carried out. None of the surrounding buildings are taller than the 25 degree line taken from two metres above ground level and it is therefore expected that good daylighting will be achieved within the interior of the proposed development.
- 6.50 With regard to the level of sunlight to be received within the proposed development, it has not been possible to propose south facing windows, as to do this would not allow for the broad structure of the existing building on the site to be retained. However, it is expected that adequate sunlight will be received to all habitable rooms, as well as the ground floor employment space.
- 6.51 With regard to the lower and upper basement employment space, lightwells have been incorporated at the front, rear and middle of these spaces in order to provide natural lighting and ventilation to these areas. This will be supplemented by artificial lighting as required. It is considered that this level of lighting is sufficient for this employment space, as it will not be for habitable purposes.
- 6.52 The CPG confirms that the BRE guidelines are not a rigid set of rules and that it may be appropriate to adopt a flexible approach (paragraph 14.18). Furthermore, BRE guidance states that its aim is to help rather than constrain and that it should be interpreted flexibly, considering the fact that natural light is only one of the many factors in site layout design. A flexible

approach is appropriate in this instance, due to the proposal's limited impact on sunlight and daylight overall.

Privacy

- 6.53 Policy SD6 in Camden's UDP clearly states that the Council will not grant planning permission for development that will harm the amenity of either occupier's or neighbours, in relation to privacy and overlooking. The CPG also notes that in order to ensure privacy there should normally be a minimum distance of 18 metres between the windows of habitable rooms of different units that directly face each other.
- 6.54 Those windows located at the rear of the development are more than 18 metres from any other habitable rooms and will therefore have sufficient visual privacy. Those buildings at the rear (numbers 19 and 21 Belmont Street) are in use as commercial space and therefore will not affect the privacy of the students residing within the proposed development. Numbers 12 and 14 will not encounter any significant increase in overlooking of their gardens, as there are no windows within habitable rooms located on this northern face of the development.
- 6.55 Regarding the privacy of the occupiers of the proposed new development, the windows at the front façade of the building on the site of 10a Belmont Street face onto the rear façade of 6 and 8 Belmont Street, and are at distance of less than 18 metres away. Although less than the recommended distance, it is felt that this is acceptable in this instance due to the fact that the distance retained between the windows is in order to retain the existing building profile and thus reflects the character and architectural profile of the existing building. The distance between the two properties is in fact slightly wider than the current building's situation, and therefore there should be no further loss of privacy cause by the development.

Noise

- 6.56 A separate noise assessment has been provided, which describes the surveys and testing which has been carried out in line with PPG24 and the relevant British Standards, to consider:
- the suitability of the site for a residential type of use;
 - an assessment of the suitability of the building for commercial office space;
 - noise limit specification for fixed plant associated with the development, and predicts noise levels from likely fixed plant at the nearest receptors; and
 - details of noise mitigation measures where necessary

This assessment shows that some mitigation will be required to against traffic noise to ensure an adequate level of protection against noise for the student accommodation. It would therefore meet the requirement of policy SD6, which seeks to protect the amenity of occupiers of new developments. Mitigation is also proposed in the form of appropriate thermal double glazing in the front elevation. In addition, mitigation of any potential noise from ventilation plant equipment is recommended to meet LB Camden's requirements of noise outputs to be 5dB below measured background noise levels.

- 6.57 The applicant has agreed to enter into a legal agreement as part of the S.106, to provide a Student Management Plan in order to address potential amenity issues and ensure appropriate measures are implemented, particularly with regard to the potential noise created by the resident students and thus the potential impact on the surrounding neighbours.
- 6.58 Furthermore, the scheme will be registered under the Considerate Constructors Scheme, where best practice principles are to be met. This will ensure that the construction site is managed in an environmentally and socially considerate and accountable manner, as detailed in the Sustainability Assessment.

Impact on Local Services

- 6.59 Key services such as doctor and dentist are not provided within the proposed development, due to the fact that these services are either offered or recommended by the relevant educational institutions. The two most significant educational institutions, University College London and the University of Westminster, both provide doctor and dentist facilities for their students on the university campus. Other higher education institutions within the vicinity of the development recommend appropriate doctors and dentists for their students to use, which are located close to the educational institution itself. There will not therefore be an impact on local key services such as these.

Open Space

- 6.60 The development site is located within 1.2 km of both Regents Park and Belsize Park, which are both classed as district parks, as shown in appendix D of the CPG and is thus not considered as being in an area deficient of park space. Additionally, appendix D of the Camden Planning Guidance indicates that the application site is located within less than 200 metres of two locally accessible parks.
- 6.61 It is noted that policy N4 requires that where a development will increase the pressure on public open space, as this development is likely to, a contribution should be provided to overcome this. It is also stated within the CPG that students are major users of open space, in particular amenity open space and formal recreation space.
- 6.62 New development is required to provide 9 m² of public open space per person, as stated in paragraph 39.10 of the CPG. Within the proposed development, there are 163 rooms, including communal space located on the seventh floor. The applicant is willing to enter into a S.106 legal agreement to provide funding towards the provision or improvement of public open space, in addition to that which will be provided on site. Whilst contributions are generally calculated in terms of bed spaces, as the accommodation is to provide for students who are often only present during term-time, it is considered that a reduced contribution should be acceptable. Within the committee report for a similar development for student accommodation at 2-12 Harwood Street, a reduced contribution of 60% of the figure calculated by the formula in the CPG, and was considered acceptable.
- 6.63 There are no existing trees on the development site and none will be affected by the development. Details of landscaping, including tree pits and types of planting and species are to be agreed by condition, given the small area proposed.

Servicing/Access

- 6.64 Residents and visitors to the scheme will access it by either foot or bicycle and, as has already been noted, the scheme will be secured as car-free via a S.106 legal agreement. The main pedestrian access for both the students and business users will be via Belmont Street. The Transport Statement accompanying this application describes access to the site.
- 6.65 The proposed development will mainly be serviced via the rear of 10a Belmont Street, which is accessed via Ferdinand Street. The service will lift provide access to the student cycle parking in the lower basement will also facilitate the delivery of heavy items to the basement. The service lift will also allow refuse to be transferred from the basement to the rear yard on collection days. It will only be accessible by authorised personnel and will not be for use by the employees. Further details regarding this can be found within the Transport Statement.
- 6.66 A Construction Traffic Management Plan also accompanies this application and describes the principle issues for accessing the site during the construction phase.
- 6.67 Biomass deliveries will take place from Belmont Street. This is due to height restriction of 3.2 metres at the entrance to the rear yard, which means that it is not possible for the biomass delivery vehicle to gain access. Such deliveries are only likely to be required once every five weeks, as further detailed within the Transport Statement.
- 6.68 Access to the proposed development and movement within it is suitable for disabled users, in line with Part M of Building Regulations and Camden UDP's policy H7. Access to the building and all internal floors will be level, with the exception of a 1:12 disabled ramp at the changing levels of the lower and upper basement floors.
- 6.69 Although Lifetime Homes standards are encouraged, policy H7 of the UDP notes that student accommodation is exempt from these standards. However, the proposed development still meets a number of the criteria for Lifetime Homes as detailed below:
- 1. Car parking width: not applicable as no car parking is being provided within the development;
 - 2. Access from car parking: not applicable as no car parking is being provided within the development;
 - 3. Approach gradients: the main entrance to the proposed development is level;
 - 4. Entrances: all entrances will be illuminated as the Lifetime Homes standards specify. Additionally, level access is provided at the main entrance in line with the standards;
 - 5. Communal stairs and lifts: the communal stairs and lifts meet the standards set by Lifetime Homes;
 - 6. Doorways and hallways: all doorways and hallways meet the specifications required within the Lifetime Homes standards. All doorways are at least 0.87 metres wide and all corridors are 1.12 metres wide;
 - 7. Wheelchair accessibility: adequate space has been provided for turning a wheelchair throughout the development where appropriate. In particular, within the wheelchair

accessible units a turning circle of 1.5 metres is shown on the drawings both within the main living area and within the bathroom;

- 8. Living room: this criterion is not applicable to this development;
- 9. Entrance level bedspace: this criterion is not applicable to this development;
- 10. Entrance level WC and shower drainage: this criterion is not applicable to this development;
- 11. Bathroom and WC walls: staff disabled wc facilities, plus disabled units are provided within the development, which feature handrails suitable for disabled users,
- 12. Stair lift/through-floor lift: this is not applicable to this development;
- 13. Tracking hoist route: this is not applicable to this development;
- 14. Bathroom layout: within the disabled units in the development, a turning circle of 1.5 metres is given within the bathroom, to allow sufficient space for turning and allow for ease of access. There is therefore sufficient clear space provided in front of the WC and washbasin. Additionally, there is approximately 1 metre of space provided to the side of the WC in line with the standards;
- 15. Window specification: the windows within the development are positioned approximately 1 metre above ground level. Although this is higher than Lifetime Homes specification of 0.8 metres, it is felt reasonable given that the accommodation is not permanent; and
- 16. Controls, fixtures and fittings: all switches, sockets, ventilation and service controls will be located at a height usable by all (between 0.45 metres and 1.2 metres from the floor), in line with the standards.

Additionally, in line with policy H7, the proposed development includes 17, out of a total of 163, wheelchair accessible units, over the 10% required by policy. These wheelchair accessible units are indicated clearly on the plans.

Proposed Refuse Strategy

- 6.70 Full details of the Refuse Strategy for the proposed development are included within the Transport Statement. It is proposed that 12 x 1100 litre Eurobins are incorporated, plus two wheelie bins. Eight of these would be designated for the residential element of the development and three will be designated for the employment units. The wheelie bins would be for business use only. Nine of the Eurobins will be used for non-recyclable waste. The further three Eurobins and two wheelie bins will be used for recyclable waste
- 6.71 This will surpass the national target of 30% of household waste to be recycled, as noted in Camden's Waste Storage Requirements. This overall strategy is in line with policy SD6 of Camden's UDP which seeks for adequate provision to be made for waste facilities.
- 6.72 The refuse store will be located in the lower basement of the development. It is recognised that waste storage guidance states that basement areas should not be used for storing refuse. However, there will suitable access and ventilation provided to make this area suitable.
- 6.72.1 On designated collection days, refuse vehicles will collect refuse from the delivery yard to the rear of the site, accessed from Ferdinand Street.

Crime Prevention and Community Safety

- 6.73 In accordance with Policy B1b and SD1d of Camden's UDP, measures have been incorporated into the design of the proposed development to promote personal safety and security and to reduce crime and the fear of crime, taking into account the Secured by Design principles. The design of the scheme has been influenced by the Crime Prevention Design Advisor at Camden Police as follows:
- 6.74 As indicated in the CPG, particular consideration has been given to the points laid out in Safer Places: the Planning System and Crime Prevention,⁷ which are namely those of access and movement within the building, the structure of the building, surveillance, physical protection, ownership, activity levels, and management and maintenance.
- 6.75 With regard to access into the building and movement throughout it, the main reception of the building will be manned on a 24-hour basis in order to control access. Students and employees will have separate entrances, and access will be controlled with key cards. Separate lifts and stairs have been provided to separate access to the employment area and the student accommodation such that both of these uses will be fully segregated from each other. Stairs are also located at the north and west of the development for emergency access. Pedestrian access within the building will be controlled via keycards, which will only grant access to specific areas depending on the user. There will be appropriate signage throughout the building to encourage ease of movement within it.
- 6.76 The only element of shared space within the development will be the cycle lift at the rear of the building, which may also be used for larger goods required for the business development. Access will be for authorized personnel only.
- 6.77 Measures have been taken within the design of the building to ensure it is safe for all. The lightwell fronting Belmont Street is secure, as it is fully surrounded by a 1100m tall glass balustrade and the base of the well sits sufficiently below pavement level thus making it difficult to access. It is anticipated that the lightwell would only need to be accessed for maintenance reasons. Within the building management contract, a method statement and risk assessment will be included from the maintenance contractor prior to them accessing the light well.
- 6.78 Appropriate surveillance measures for the building will be included. External lighting will be provided and all details of this will be submitted via condition. CCTV will be provided on a 24-hour basis all around the building and including all entrances. This will be monitored at the reception area and a 24-hour entry phone system will also operate from the entrance off Ferdinand Street.
- 6.79 The clear division of private student units within the building will encourage ownership of these. Additionally, the shared spaces within the building that will be restricted to the students residing there should encourage a sense of ownership. The seventh floor social space provides a private but shared space for the students, where they can feel a sense of belonging and safety but within an open space.

⁷ ODPM (2004) *Safer Places: the Planning System and Crime Prevention* [online] available from: <http://www.communities.gov.uk/publications/planningandbuilding/saferplaces> (accessed on 14th April 2009)

- 6.80 The level of activity that the development will create is appropriate to its setting. The development will increase pedestrian activity within this part of Belmont Street, thus increasing natural surveillance of the area and improving community safety. It will also reduce vehicular activity on Belmont Street, as demonstrated in the Transport Statement, thus improving safety for all users of the road.
- 6.81 A Student Accommodation Operational Management plan will also be put in place, via condition, in order to ensure the efficient and safe running of the development.

Environmental Sustainability/Ecology

- 6.82 The proposed development, being over the 1000 m² threshold, meets the requirements of London Plan policy 4A.7, by including the provision of at least 20% renewable energy. Further measures have been taken, in line with the Mayor's hierarchy of
- Use less energy;
 - Use renewable energy; and
 - Use energy efficiently and in line with Camden Planning Guidance, which notes that developments should be sustainable by being energy efficient and incorporating renewable energy facilities.

This is further detailed in the attached Energy Statement.

- 6.83 The proposed development adheres to the requirements of policy SD9, by proposing designs that will conserve energy and resources.
- 6.84 The development will achieve at least 20% carbon dioxide saving through the use of renewables, in line with the requirements of London Plan policy 4A.7. This will predominantly be achieved through a biomass boiler. As discussed in the Energy Statement, a CHP system would not be suitable for this development. Further energy saving measures, including best practice building fabric improvements, have also been incorporated into the development, leading to a reduction in regulated CO₂ of 40%, as further detailed within the Energy Statement and which is above the requirements of London Plan (policy 4A.2, paragraph 4.14).
- 6.85 The proposed development meets the BREEAM rating of 'very good.' Camden Planning Guidance requires that developments achieve 60% of the available credits within the energy section of the BREEAM pre-assessment, as this development does, achieving 78% for both the student accommodation and business uses. The proposed development meets the target of 60% set for water and complies with policy 4A.16 of the London Plan, by proposing water saving measures that contribute to 71% of the credits within the BREEAM pre-assessment for the student accommodation and 66% for the employment use. Additionally, at least 40% of the credits have been secured under the materials section of the BREEAM pre-assessment, in line with the CPG. Further details of the energy saving measures within the development are detailed within the Energy Statement and Sustainability Assessment.
- 6.86 The proposed development features a number of water-saving devices as further detailed within the Sustainability Assessment. These include water efficient taps, shower and dual flush

WCs, flow restrictors to manage water pressure, water efficient white goods and water meters to detect leakages. A rainwater harvesting system will also be included in the communal garden. These measures are compliant with policy SD9 of the UDP, contributing above 60% of credits achieved in the BREEAM pre-assessment.

- 6.87 Construction waste management will be compliant with policy 4A.28 of the London Plan, as further detailed within the Sustainability Assessment. It is not possible to use all of the materials from the existing building within the proposed development. However, a large proportion will be re-used. The introduction of carefully selected new materials is to ensure that the proposal results in a high quality development in terms of material finishes. Therefore, an audit of the materials on the site will be carried out to identify salvageable raw materials and, in particular, recovery and treatment of brick, concrete and asphalt. See the Sustainability Assessment for further details of where these materials are intended to be re-used. It is proposed that the remaining materials will be stored on site and re-used in other developments in the surrounding area, which would be in accordance with policy SD9C(d). At least 40% of the credits have been secured under the Materials section of the BREEAM pre-assessment, in accordance with the target in Camden's Planning Guidance.
- 6.88 Reflecting its accessible location, the scheme has been developed to be car-free, encouraging both residents and workers to use a means of transport other than the private car, in line with policies H9 and T8 of the UDP. A S.106 legal agreement will be entered into to ensure that the development is car free and that occupants of the development would not be eligible to apply for residents parking permits in the area.
- 6.89 In accordance with policy T3 of Camden's UDP, a cycle store is to be provided within the building, providing space for the secure and safe storage for both the students and employees. The scheme provides 86 cycle spaces for the student accommodation and 24 spaces for the business users, plus an additional 8 spaces for visitors to the student accommodation. The provision of cycle storage for the student accommodation is below the UDP's requirements for a C3 residential unit, which requires one secure cycle parking space per unit, plus spaces for visitors. However, it is above the standards for hostel or residential institutions, detailed in Appendix 6 of the UDP, which states that there should be 1 space provided per 250 m² (above a threshold of 500 m²). These different standards would require either 163 cycle spaces or 17 cycle spaces respectively. It is therefore felt that the proposal of 86 cycle spaces is a realistic and appropriate level of provision. Additionally, the site has a public transport accessibility level (PTAL) of 5. This is in line with the Transport for London (TfL) standard of one cycle parking space for every two students. The bicycle storage area in the lower basement will be accessed via either the lifts or bicycle gutters on the eastern stairwell.
- 6.90 The provision of 24 cycle spaces for business users is well above both Camden standards and the TfL guidelines. Both Camden's Planning Guidance and TfL guidelines state that for 250 m² of employment space, one space is required for staff and one space for customers. This would require the provision of a maximum of 9 cycle spaces. Shower and changing facilities are also to be provided for employees.
- 6.91 In line with the requirements of policy N5 and London Plan policy 4A.11, consideration has been made within the design of the scheme to protecting and enhancing biodiversity on the site. The green roofs of the development have been designed to make an important contribution to addressing the biodiversity balance in the area. These will also provide surface

water attenuation in the form of a sustainable urban drainage system, in compliance with policy 4A.14 of the London Plan.

- 6.92 In line with the requirements of policy SD10B of the Camden UDP, any remediation work needed to clear any contaminants from the site will be undertaken in accordance with appropriate guidance, following a contamination survey. Details of this will be submitted via the standard condition.

Section 106 Matters

- 6.93 The applicant is willing to enter into a section 106 legal agreement relating to the following obligations:

- Occupation of the accommodation to be restricted to students only and no part of the property to be sold as a separate self contained unit.
- Car free housing development.
- Contribution towards the provision of public open space improvements.
- Student Accommodation Operational Management Plan.
- Construction Management Plan.
- Servicing Management plan.
- Recruitment of local labour and purchasing of local goods and services during the construction phase of the development.

- 6.94 The exact nature of these obligations and any financial contributions are to be discussed and agreed during the determination of the planning application.

7 Appendix 1: Tenancy Schedules for 10a Belmont Street

Current Tenancy Schedule

Tenant Name	Unit	Nature of tenant's business	Lease terms		Approx. NIA sq ft
			Start Date	Expiry Date	
Adjug Ltd	Ground Floor South Studio 1	Online advertising agency	16/10/2007	15/10/2012	2,300.000
Jack and Edith Schneider	Ground Floor North Studio 2	Designers / Architects	19/05/2008	18/05/2011	2,100.000
Betclick Ltd	1st and 2nd Floor South	Online Betting - UK office	08/06/2007	07/06/2010	4,200.000
H Bauer Publishing	1st North Studio 4	Publishing company	14/05/2007	13/05/2012	2,100.000
Betclick Ltd	2nd North Studio 6, 3rd North Studio 8	Online betting - UK office Online betting - UK office	25/07/2008	03/06/2010	4,200.000
Skelly and Couch LLP	3rd South Studio 7	Building environment & services engineering consultants	02/01/2008	01/01/2013	2,100.000
Lanai Ltd	4th/5th South Studio 9	Clothing distribution	08/08/2006	07/08/2011	2,600.000
Goviral Ltd	4th North Studio 10	Online advertising agency	24/06/2008	23/06/2011	2,100.000
Feast Creative Ltd	5th North Studio 11	Arts graphic studio	01/03/2006	28/02/2011	1,100.000
Total floor area (approx.)					22,800.00

Basic Building Plan showing Tenant Distribution

NORTH		SOUTH
Feast Creative Ltd	Lanai Ltd	5 th
Goviral Ltd	Lanai Ltd	5 th
Betclick Ltd	Skelly and Couch LLP	3 rd
Betclick Ltd	Betclick Ltd	2 nd
H Bauer Publishing	Betclick Ltd	1 st
Jack and Edith Schneider	Adjug Ltd	Ground

Ten-year tenancy history

Use Class

Description



B1(a)

Offices, not within A2



B1(b)

Research & development, studios, laboratories, high technology



B1(c)

Light industry

Unit No.	Unit Address	Tenant name, address and periods of occupation within each unit to the best of Hallmarks Estates knowledge			
1	Ground Floor South	Adjug Ltd - Online advertising October 2007 to date	Elizabeth Emanuel - Designer 2003 to 2005		
2	Ground Floor North	Jack & Edith Schneider - Designers/Architects May 2008 to date	Susanah Parker (Blank Space) - photo studios Oct 1999 to June 2007		
3	1st Floor South	Betclick Ltd - Online betting June 2007 to date	Add Mikkelson UK Ltd - Fashion Feb 2002 to May 2007	Jones - Photography 1998 to 2002	
4	1st Floor North	H Bauer Publishing May 2007 to date	Friends & Heroes July 2006 to Oct 2006	Manfred Vogelsanger mid 1980's to 2006	
5	2nd Floor South	Betclick Ltd - Online betting June 2007 to date	Manfred Vogelsanger mid 1980's to 2006		
6	2nd Floor North	Betclick Ltd - Online betting July 2008 to date	John Linnen June 1999 to Oct 2007		
7	3rd Floor South	Skelly & Couch - Building consultants Jan 2008 to date	Susanah Parker (Blank Space) - photo studios Oct 1999 to June 2007		
8	3rd Floor North	Betclick Ltd - Online betting July 2008 to date	High Fliers Research Ltd 1998 to 2006		
9	4th Floor South	Lanai Ltd - Clothing distribution office August 2006 to date	Manfred Vogelsanger mid 1980's to 2006		
10	4th Floor North	Goviral Ltd - Online advertising June 2008 to date	John Linnen June 1999 to Oct 2007	Kingsway College of Further Education 2000 to 2005	
11	5th Floor South	Lanai Ltd - Clothing distribution office August 2008 to date	Manfred Vogelsanger mid 1980's to 2006		
12	5th Floor North	Feast Creative - Art Studio March 2006 to date	Karmarama 2003 to 2006	Residential Flat 2001 to 2003	Eagal - Office 1993 to 1997