

MAYOR OF LONDON

Conor McDonagh
Development Control - Planning Services
Camden Council
Town Hall
Argyle Street
LONDON WCTH 8ND

Our ref: D&P/3224SC07
Your ref: 2013/7646/P
Date: 9 April 2014

Dear Mr McDonagh

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008
79 Camden Road

I refer to your letter of 31 March 2014 informing me that Camden Council is minded to grant planning permission for the above planning application. I refer you also to the notice that was issued on 1 April 2014 under the provisions of article 5(1)(b)(i) of the above Order.

Having now considered a report on this case (D&P/3224/02, copy attached) I am content to allow Camden Council to determine the case itself, subject to any action that the Secretary of State may take, and do not therefore wish to direct refusal or to take over the application for my own determination.

Yours sincerely



Boris Johnson
Mayor of London

cc Andrew Dismore, London Assembly Constituency Member
Nicky Gavron, Chair of London Assembly Planning Committee
National Planning Casework Unit, DCLG
Alex Williams, TfL
CBRE, 10 Paternoster Row, London EC4M 7HP

79 Camden Road

in the London Borough of Camden

planning application no. 2013/7646/P

Strategic planning application stage II referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008

The proposal

Demolition of existing buildings, and construction of six-interlocking perimeter blocks, up to seven-storeys in height, comprising 164 residential units.

The applicant

The applicant is **Barratt West London**, and the architect is **Sheppard Robson**.

Strategic issues

The principle of the development of this site for housing is supported in accordance with strategic policy, and the design of the proposal is of a high quality. The issues raised previously regarding **housing, climate change, and transport** have now been resolved, and the application is acceptable in strategic planning terms.

The Council's decision

In this instance Camden Council has resolved to grant permission.

Recommendation

That Camden Council be advised that the Mayor is content for it to determine the case itself, subject to any action that the Secretary of State may take, and does not therefore wish to direct refusal, or direct that he is to be the local planning authority.

Context

1 On 12 December 2013 the Mayor of London received documents from Camden Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. This was referred to the Mayor under Category 1A of the Schedule to the Order 2008: "Development which comprises or includes the provision of 150 houses, flats, or houses and flats".

2 On 20 January 2014 the Deputy Mayor and Chief of Staff, acting under delegated authority, considered planning report D&P/3224/01, and subsequently advised Camden Council that whilst the principle of the application was supported, and its design of a high quality, it did

not comply with the London Plan. However, the possible remedies, as set out in paragraph 54 of the above-mentioned report, could address these deficiencies.

3 A copy of the above-mentioned report is attached. The essentials of the case with regard to the proposal, the site, case history, strategic planning issues and relevant policies and guidance are as set out therein, unless otherwise stated in this report. On 20 March 2014 Camden Council decided that it was minded to grant planning permission, and on 31 March 2014 it advised the Mayor of this decision. Under the provisions of Article 5 of the Town & Country Planning (Mayor of London) Order 2008 the Mayor may allow the draft decision to proceed unchanged, direct Camden Council under Article 6 to refuse the application or issue a direction to Camden Council under Article 7 that he is to act as the Local Planning Authority for the purposes of determining the application and any connected application. The Mayor has until 13 April 2014 to notify the Council of his decision, and to issue any direction.

4 The decision on this case, and the reasons, will be made available on the GLA's website www.london.gov.uk.

Update

5 At consultation stage, Camden Council was advised that whilst the principle of the application was supported, and its design of a high quality, it did not comply with the London Plan. However, the possible remedies, as set out in paragraph 54 of the above-mentioned report, could address these deficiencies:

- **Housing:** in the absence of a financial viability report, it was not possible to determine whether the proposal fully accorded with London Plan Policy 3.12. A full financial viability assessment was therefore required. The applicant was also strongly encouraged to increase the proportion of affordable family accommodation in accordance with the Council's planning guidance. Furthermore, the applicant was required to provide a detailed accommodation schedule demonstrating that all units meet the space standards in accordance with London Plan Policy 3.5.
- **Climate change mitigation:** the applicant was required to provide details of the proposed operation and management of the combined heat and power system, and electricity sales. Confirmation that all of the residential units will be served by the site-wide heat-network, and a schematic of the energy plant room, was also required.
- **Transport:** the applicant was required to ensure that the two on-site parking spaces were served by electric vehicle charging points, and that no construction activity is undertaken from Camden Road. Further discussions were also required regarding possible improvements to cycle hire provision in the vicinity of the site, financial contributions towards bus stop improvements, and Legible London, in addition to Community Infrastructure Levy requirements. The provision of a construction logistic plan, delivery and servicing plan, and a residential travel plan was also required to be secured by the Council.

Update

Housing - mix of units

6 At consultation stage, the applicant was encouraged to explore whether additional family affordable units could be provided in accordance with the Council's policy guidance. Within the social housing element, where the strategic priority for family housing is targeted, the proposal included eleven three-bed plus units, equating to 24% of provision, which was substantially below the Council's Planning Guidance: CPG 2 Housing 50% guidance for the provision of family social housing.

7 In response to concerns raised by the Council regarding the proposed affordable housing mix, the applicant has subsequently amended the housing schedule to include two more family affordable units, raising the proportion of family affordable housing from 24% of provision to 30%. This has resulted in the loss of two affordable non-family units, reducing the total amount of residential accommodation from 166 units to 164. The revised mix is provided below.

Unit type	Market	Affordable rent	Intermediate	Total
one-bed	16	9	23	48
two-bed	60	22	15	97
three-bed	6	10	0	16
four-bed	0	3	0	3
Total	82	44	38	164

8 Given the increase in family affordable units, which better reflects the Council's policy guidance, and ensures a range of housing choice, with priority afforded to family affordable housing, in accordance with London Plan policy, the proposal is acceptable with regards to mix of units.

Housing – affordable provision

9 At consultation stage, whilst the substantial proportion of affordable housing was supported (at that stage given as 51%), in accordance with London Plan Policy 3.12, the applicant was required to demonstrate that this represented the maximum reasonable amount of affordable housing. As discussed above, in response to concerns regarding mix of units the residential element has subsequently been amended, and consequently the proposal now includes 50% affordable housing.

10 As requested at consultation stage, and in accordance with London Plan Policy 3.12, the applicant has provided a financial viability report, which demonstrates that the application includes the maximum reasonable amount of affordable housing. The proposal is therefore acceptable with regards to affordable housing.

Housing – space standards

11 The applicant had stated in its submission documents that all units will meet and exceed the space standards set out in London Plan Policy 3.5. However, at consultation stage it was not possible to ascertain this from the accommodation schedule submitted, as this did not disaggregate per unit. The applicant has subsequently submitted a detailed schedule, and updated plan, which demonstrates that all residential units meet or exceed London Plan space standards. The application therefore fully accords with London Plan Policy 3.5.

Climate change

12 At consultation stage, the applicant was required to provide details of the proposed operation and management of the combined heat and power system, and electricity sales. Confirmation that all of the residential units will be served by the site-wide heat-network, and a schematic of the energy plant room, was also required.

13 The applicant has subsequently confirmed that the site-wide heat-network will serve all the residential units from a single energy centre, and has provided a schematic of the plant room. The combined heat and power plant will be managed by the applicant's own management company, and electricity generated will be used on-site, and not sold to the grid. This appropriately responds to comments raised previously, and is acceptable.

Transport

14 At consultation stage, whilst TfL was satisfied that the proposals would not result in an unacceptable impact on the operation of the strategic highway or public transport network, a construction logistics plan, and delivery and servicing plan, was required to be secured by condition. In addition TfL requested that future residents be restricted from obtaining on-street parking permits, that a contribution be secured towards the Mayor's cycle hire scheme, and that the applicant be required to enter into a s278 agreement with TfL for any works proposed on the Transport for London Road Network.

15 The section 106 heads of terms detailed in the committee report has subsequently secured; a highways contribution of £179,000, payable to the Council towards the removal and installation of two crossovers plus the relocation and removal of existing street furniture; a residential travel plan plus monitoring fee; a contribution of £165,000 towards pedestrian, cycling and environmental improvements, part of which TfL recommends should be directed towards the installation of Legible London signage and the expansion of the cycle hire scheme; the requirement to submit a construction logistics plan, and delivery and servicing plan, and £15,000 towards new street planting, all of which is supported. Whilst not currently included in the heads of terms, the applicant, and Council are reminded that any works required to Camden Road, including footway reinstatement, will require entering into a s278 agreement with TfL as the highway authority. This should therefore be referenced in the final version of the legal agreement.

16 In summary, TfL is satisfied that the all the issues raised at consultation stage have been satisfactorily addressed, and that the proposal accords with the transport policies of the London Plan.

Response to consultation

Local neighbourhood consultation

17 Camden Council publicised the application by sending notifications to all adjoining owners and occupiers (455 consulted in total). A total of fifteen representations were received in response to the local neighbourhood consultation, all of which raised objection to the proposal. In summary, the following issues were raised:

- **Land use:** loss of existing building; loss of employment floorspace; development should include a supermarket, coffee shop, and nursery; inadequate access to GP and dentistry services in the area; inadequate affordable housing; need for profit to go to the local community, and the Council should develop the site itself.

- **Urban design:** the proposal takes away frontage space on St Pancras Way; development should be set back from Rochester Place; height and scale of proposal; inadequate sunlight to the proposed courtyard space, and bin holding area could be unpleasant.
- **Impact on local amenity:** overlooking and loss of sunlight to the Rochester Mews residents, and neighbouring office use; increased noise; impact on outlook and privacy of surrounding properties, particularly the office use, which raises a security risk; proposed balconies will impact on neighbouring office use, and impact of construction phase on the adjacent TV production operation.
- **Transport:** need for parking, and overcrowded public transport.

18 Matters relating to impact on local amenity have been appropriately assessed by the local authority, who concluded that the proposed development in terms of daylight, sunlight, overshadowing, outlook and privacy considerations is on the whole acceptable.

19 With regards to the objections raised relating to design, as stated in the Mayor's consultation report, no strategic concerns are raised with regards to height and massing, and overall the proposal delivers a robust and high-quality residential building, which is strongly supported. The Council, in its assessment of the application, concluded that the scale of the building was appropriate, and is of high architectural quality and design detail, and will provide an enhancement to the surrounding townscape.

20 As detailed in this report, the proposed level of affordable housing has been demonstrated to represent the maximum reasonable amount, and the revisions to incorporate additional family affordable accommodation are strongly supported. The section 106 agreement secures a financial contribution towards education, community facilities, and public open space, as identified by the Council in response to the additional need created by this development.

21 Finally, matters relating to transport have been assessed and found to be acceptable by the local planning authority, and Transport for London.

22 A letter of support was also provided by the Registered Provider, Newlon Housing Trust, stating that the delivery of affordable housing in central London is becoming increasingly difficult and that this scheme will provide well-designed housing in a location residents will be proud to call home. The two courtyard approach was identified as ensuring the best management of resources and streamlining of service charge liabilities so that they are genuinely affordable for the residents.

Statutory consultees and local bodies

23 The following statutory consultees provided a consultation response to this application:

- **Thames Water:** requests standard conditions, and an informative, be secured relating to piling. An appropriate condition has been included by the Council in the draft grant of planning permission.
- **Natural England:** encourages the application to incorporate features into the design that are beneficial to wildlife, and improve the natural and built environment. The Council has secured the provision of bat and bird nesting boxes, and the provision of a biodiverse roof, through condition.

24 Both North Camden Town Neighbourhood Forum Steering Group, and Reed's Rochester Place Neighbourhood Association, submitted to the Council detailed objections. Both bodies also provided representations directly to the Mayor. These comments are therefore detailed below.

Representations to the Mayor of London

25 Three representations to the Mayor objecting to the proposal have been received. Councillor Chris Naylor highlighted concerns raised by two local amenity groups regarding lack of open space, lack of sunlight in the proposed courtyards, and the residential quality of the proposed residential units. Both the North Camden Town Neighbourhood Forum Steering Group, and Reed's Rochester Place Neighbourhood Association, also provided detailed comment direct to GLA officers outlining a number of objections. These have been summarised below:

- **Land use:** loss of industrial space; suitability of the site for continued business use; and retention of existing employment space on other sites in Rochester Place.
- **Housing quality and design:** proposal not meeting minimum space standards; provision of single aspect units; lack of sunlight within the internal courtyards; sunlight and daylight levels within the residential units; quality of accessible units; roof-top amenity space not appropriate for children; loss of public realm on Camden Road, and insufficient bulky and waste storage.
- **Transport:** compromised servicing and deliveries; access on Rochester Place not appropriately considered; location of blue badge parking bays; and construction and management approach not specific to the area.
- **Other:** low proportion of photovoltaic panels; need for new schools; need for GP services; no viability report submitted; loss and disturbance to public realm, and loss of street trees.
- **Omissions and errors in the Council's report**

26 With regards to land-use, the existing building has an established office use, and not light industrial. As detailed in the Mayor's consultation report, the redevelopment of this site for housing raises no strategic concern. The Council also concluded that the loss of the office space has been justified by relevant national, regional and local policies, and that re-provision with the Council's top land-use priority housing, is strongly supported, and agreed by its committee.

27 As detailed in the Mayor's consultation report, the overall residential quality of the scheme is high, and to be commended, and the applicant has subsequently confirmed that all units meet London Plan space standards. The approach to play and amenity provision was also broadly supported at consultation stage. The Council has assessed the housing element in detail against its local policies and found it to be acceptable, including with regards to daylight, sunlight, privacy, and overlooking.

28 As detailed in paragraphs nine and ten of this report, a financial viability report has been submitted to the GLA which demonstrates that the application includes the maximum reasonable amount of affordable housing. The section 106 agreement secures a financial contribution towards education, community facilities, and public open space, as identified by the Council in response to the additional need created by this development. Furthermore, matters relating to transport have been assessed and found to be acceptable by the local planning authority and Transport for London.

Article 7: Direction that the Mayor is to be the local planning authority

29 Under Article 7 of the Order the Mayor could take over this application provided the policy tests set out in that Article are met. In this instance the Council has resolved to grant permission with conditions and a planning obligation, which satisfactorily addresses the matters raised at stage 1, therefore there is no sound planning reason for the Mayor to take over this application.

Legal considerations

30 Under the arrangements set out in Article 5 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor has the power under Article 6 to direct the local planning authority to refuse permission for a planning application referred to him under Article 4 of the Order. He also has the power to issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. The Mayor may also leave the decision to the local authority. In directing refusal the Mayor must have regard to the matters set out in Article 6(2) of the Order, including the principal purposes of the Greater London Authority, the effect on health and sustainable development, national policies and international obligations, regional planning guidance, and the use of the River Thames. The Mayor may direct refusal if he considers that to grant permission would be contrary to good strategic planning in Greater London. If he decides to direct refusal, the Mayor must set out his reasons, and the local planning authority must issue these with the refusal notice. If the Mayor decides to direct that he is to be the local planning authority, he must have regard to the matters set out in Article 7(3) and set out his reasons in the direction.

Financial considerations

31 Should the Mayor direct refusal, he would be the principal party at any subsequent appeal hearing or public inquiry. Government guidance in Circular 03/2009 (*Costs Awards in Appeals and Other Planning Proceedings*) emphasises that parties usually pay their own expenses arising from an appeal.

32 Following an inquiry caused by a direction to refuse, costs may be awarded against the Mayor if he has either directed refusal unreasonably; handled a referral from a planning authority unreasonably; or behaved unreasonably during the appeal. A major factor in deciding whether the Mayor has acted unreasonably will be the extent to which he has taken account of established planning policy.

33 Should the Mayor take over the application he would be responsible for holding a representation hearing and negotiating any planning obligation. He would also be responsible for determining any reserved matters applications (unless he directs the council to do so) and determining any approval of details (unless the council agrees to do so).

Conclusion

34 The principle of the redevelopment of this site for housing is supported in accordance with strategic policy, and the design of the proposal is of a high quality. The issues raised at consultation stage regarding housing, climate change and transport, have all been addressed, and the application is now acceptable in strategic planning terms.

79 Camden Road

in the London Borough of Camden

planning application no. 2013/7646/P

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008

The proposal

Demolition of existing buildings, and construction of six-interlocking perimeter blocks, up to seven-storeys in height, comprising 166 residential units.

The applicant

The applicant is **Barratt West London**, and the architect is **Sheppard Robson**.

Strategic issues

The principle of the redevelopment of this site for housing is supported, and the design of the proposal is of a high quality. However, there are outstanding strategic planning concerns relating to **affordable housing, climate change and transport**.

Recommendation

That Camden Council be advised that, whilst the principle of the proposal is supported, the application does not comply with the London Plan, for the reasons set out in paragraph 54 of this report. However, the resolution of those issues could lead to the application becoming compliant with the London Plan.

Context

1 On 12 December 2013 the Mayor of London received documents from Camden Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 22 January 2014 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Category 1A of the Schedule to the Order 2008: "Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats".

3 Once Camden Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

5 The 0.42 hectare site is located to the north-east of Camden town centre, and is bound to the east by Camden Road, to the south by St Pancras Way, to the west by existing commercial properties, and to the north by Rochester Place. The site is located outside the designated town centre boundary, and is not within a conservation area, although it does lie within close proximity to four conservation areas (Rochester, Camden Square, Camden Broadway, and Jeffrey's Street). The site also lies within strategic view London Panorama: Parliament Hill (viewing location 2A.1), as identified in the London View Management Framework Supplementary Planning Guidance.

6 Camden Road, which bounds the site to the east, forms part of the Transport for London Road Network. The closest section of the Strategic Road Network is the A400 Kentish Town Road, located approximately 400 metres to the north-west of the site. Camden Road station, which provides access to London Overground services, is located approximately 200 metres to the south of the site. Twelve bus services operate within reasonable walking distance of the site (routes 24, 27, 29, 31, 46, 88, 134, 168, 214, 253, 274 and C2). Given the range of services available, the site achieves an excellent public transport accessibility level of 6b, on a scale of one to six, where six is excellent. In addition, there is a cycle hire docking station located close to Camden Road station.

7 The site currently comprises a series of amalgamated buildings that were used by the Council for office purposes until summer 2012. The main building, fronting St Pancras Way, comprises a three-storey central block, with two two-storey winged elements. The main building is linked, via a two-storey extension, to a four-storey block fronting Camden Road. The site is surrounded by predominantly residential properties, with commercial elements located immediately to the west

Details of the proposal

8 Barratt Homes West is seeking full planning permission for the demolition of the existing buildings on site, and the construction of six-interlocking perimeter blocks, creating an S-shape plan, with two internal and two roof-top courtyards, comprising 166 residential units, and 905 sq.m. of communal amenity space. The proposed building is predominantly five-storeys in height at its main parapet, with a two storey-set back. The parapet height is reduced to four storeys at the St Pancras Way frontage. The development is proposed as car-free, with the exception of two blue badge spaces.

Case history

9 There is no relevant strategic case history for this site. The application considered here was subject to formal pre-planning application discussions with GLA officers on 10 September 2013 (D&P/3224/pre-app). Following formal discussions, officers concluded that whilst the redevelopment of this site for housing was supported, and the design proposed was promising, further discussions were required regarding affordable housing, design, inclusive design, climate change, and transport.

Strategic planning issues and relevant policies and guidance

10 The relevant issues and corresponding policies are as follows:

- Employment *London Plan*
- Housing *London Plan; Housing SPG; Housing Strategy; draft Revised Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context, draft SPG*
- Affordable housing *London Plan; Housing SPG; Housing Strategy; draft Revised Housing Strategy*
- Density *London Plan; Housing SPG*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context, draft SPG; Housing SPG; London Housing Design Guide; Shaping Neighbourhoods: Play and Informal Recreation SPG*
- Strategic views *London Plan, London View Management Framework SPG*
- Access *London Plan; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM)*
- Sustainable development *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy*
- Transport *London Plan; the Mayor's Transport Strategy*
- Parking *London Plan; the Mayor's Transport Strategy*

11 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the Council's Core Strategy (2010), Development Policies (2010), and Proposals Map, and the London Plan (with 2013 Alterations).

12 The following are also relevant material considerations:

- Draft Further Alterations to the London Plan (with 2013 Alterations).
- Camden Planning Guidance (September 2013).
- National Planning Policy Framework, and Technical Guide to the National Planning Policy Framework.

Principle of development

13 The site currently comprises 7,188 sq.m. of office (B1) floorspace. The site is not located within a town centre, or an Opportunity Area, and lies outside of the Central Activities Zone, as identified in the London Plan. London Plan policies support office rejuvenation within the CAZ to improve the quality and flexibility of office stock, in order that it can meet the distinct needs of the central London office market. Outside of the CAZ, London Plan policies support the consolidation and extension of London's diverse office markets, whilst facilitating the redevelopment of surplus office space for other uses, including housing. The London Office Policy Review 2012 illustrates the great variability in the attractiveness and success of outer and inner London office markets, and supports the concept of focussing demand on the most viable and competitive business locations.

14 At the local level, the Council resists the loss or reduction of business floorspace, stating in its Development Management Policies Development Plan Document (2010), that proposals resulting in a loss or reduction of business floorspace will be resisted unless the applicant can demonstrate that the

site is no longer suitable for business use, and that the potential use of the site has been fully explored for a period of at least two years.

15 In support of its proposal, the applicant has submitted an employment statement, which argues that the site is in poor condition, and would be unviable for continued business use, that demand for employment floorspace in this location is limited, and that borough-wide there is projected to be sufficient supply of office floorspace to meet demand over the plan period to 2026. In this context, the loss of office floorspace in this location, which is away from other more successful and strategically significant office-based locations within the borough, does not cause strategic concern.

16 London Plan Policy 3.3 provides explicit strategic support for the provision of housing within London. The draft Further Alterations to the London Plan (with 2013 Alterations), establishes a housing target for the borough of 8,892 net additional dwellings for the Plan period 2015-2025. The site's location within an existing residential area, in close proximity to Camden town centre, with good public transport links, supports the provision of housing. The principle of the proposal is therefore acceptable in strategic planning terms.

Housing

17 The application includes 166 residential units. A detailed housing schedule is provided below:

Unit type	Market	Affordable rent	Intermediate	Total
one-bed	16	11	23	50
two-bed	60	24	15	99
three-bed	6	8	0	14
four-bed	0	3	0	3
Total	82	46	38	166

Affordable housing

18 London Plan Policy 3.12 requires borough councils to seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed-use schemes. The application includes 84 affordable housing units, equating to 51% of overall provision. Whilst this commitment to a substantial proportion of affordable housing is strongly supported, in accordance with London Plan Policy 3.12, the applicant is required to demonstrate that this represents the maximum reasonable amount of affordable housing. At present no details regarding financial viability have been provided. It is therefore not possible at this stage to determine whether the application fully accords with London Plan Policy 3.12. The applicant is therefore required to submit a financial viability assessment in support of its affordable housing proposal.

19 London Plan Policy 3.11 establishes a strategic target that 60% of affordable housing provision be for social rent and affordable rent housing, and 40% for intermediate provision. The application includes 46 units proposed for affordable rent, and 38 units for intermediate provision. When measured by unit, this equates to a split of 55:45 social housing to intermediate provision. Whilst this does not accord with the strategic target within London Plan Policy 3.11, when taking a floorspace calculation the social housing to intermediate split is 60:40, reflecting the larger units proposed within the social housing element. This is supported in accordance with strategic policy.

Housing choice

20 London Plan Policy 3.8, together with the Mayor's Housing SPG, and the draft Revised Housing Strategy, seek to promote housing choice and a balanced mix of unit sizes in new developments, with particular focus on affordable family homes. The Council has identified within its Development Policies Development Plan Document that, within the social housing element, highest priority be afforded to family accommodation. Within its recent Camden Planning Guidance: CPG 2 Housing, the Council establishes a requirement that 50% of units within overall social housing provision be three-bed plus homes.

21 The application includes seventeen three-bed plus family units, equating to 10% of overall provision. Within the social housing element, where the strategic priority for family housing is targeted, the proposal includes eleven three-bed plus units, equating to 24% of provision. This is substantially below the Council's 50% guidance for the provision of family social housing. Whilst the applicant has sought to prioritise the provision of family housing within the affordable element, which is supported, the applicant is strongly encouraged to explore whether additional family units can be provided in accordance with the Council's policy guidance.

Housing quality and design

22 London Plan Policy 3.5 promotes quality in new housing provision, with further guidance provided by the Mayor's Housing SPG. The applicant has stated in its submission documents that all units will meet and exceed the space standards set out in London Plan Policy 3.5. However, it is not possible to ascertain this from the accommodation schedule submitted, as this does not disaggregate per unit. A more detailed schedule should therefore be provided demonstrating the size of each unit against London Plan standards.

23 Notwithstanding the need to confirm the size of the units, the overall residential quality of the scheme is high, and to be commended. The proposal includes thirty duplex units, independently accessed either at ground-level, or lower-ground level, providing quality family accommodation, and ensuring active frontages, and a traditional residential terrace-type environment, both at street level and within the proposed internal courtyards. The generous number of cores proposed results in the provision of 78% of the units as dual-aspect, with only five units being single-aspect, north-facing, representing 3% of all accommodation. This is strongly supported.

24 The applicant has responded positively to comments made by GLA officers at pre-planning application stage, and brought forward the entrances to blocks A and B to increase their prominence, degree of overlooking, and consequently the sense of security and safety for residents of these blocks. Whilst this is strongly supported, it is disappointing that these entrances remain distinctly less prominent and attractive than those serving the remaining blocks, and involve a convoluted route from street to core, and, in the case of block A, is largely screened by the blue badge parking space.

25 In response to the need to provide for residential amenity and play space provision, the proposal includes a range of spaces, including private balconies and patios, communal formal courtyards, in addition to roof-top play space provision. As part of the formal pre-planning application discussions, the nature, role and quality of the lower-ground floor courtyards was discussed. Given their location and surrounding built form, it is acknowledged that these spaces will not benefit from generous levels of light, and therefore their usability for amenity provision is limited. However, as set out by the applicant, these spaces primarily serve as an arrival and transition space and are not intended for general amenity. As such, the proposal includes two roof-top courtyards, which will provide quality, light and well-sized areas for play and general amenity. This approach is broadly supported.

26 London Plan Policy 3.9 seeks to ensure the delivery of mixed and balanced communities to foster social diversity and redress social exclusion, supported by effective and attractive design. In accordance with this strategic objection, the layout, nature and the design of developments should not differentiate between tenures. The design of the proposal is prefaced on the principle of splitting the private and affordable elements around an accompanying courtyard. In this respect, the tenures are physically separated both in terms of entrance points, but also circulation, and amenity space provision. At pre-planning application stage, GLA officers encouraged the applicant to consider the reallocation of some cores in order to better integrate the three types of housing tenure throughout the development. However, the applicant has stated that due to the need to limit the service charges for the affordable units, and assist in their long-term management, the Registered Provider has sought to maintain this separation. It is acknowledged that the affordable and private tenures both benefit from ground and lower ground-floor duplex units, formal and roof-top courtyards, as well as private amenity space. As discussed below, the roof-top courtyard associated with the affordable units is considerably larger than that for the private residents and will ensure appropriate levels of overall play and amenity space. It is further acknowledged that the design of the development does not differentiate externally between tenures, and in that respect will be 'tenure-blind'. On balance, the approach to residential layout is acceptable.

Density

27 The density of the development is 1,045 habitable rooms per hectare. This is within the London Plan guidance range of 650 to 1,100 habitable rooms per hectare for central sites with a public transport accessibility level of six, as set out in London Plan Policy 3.4.

28 Given the high levels of public transport accessibility at this site, and its location in close proximity to Camden town centre, on a main arterial route, it is acknowledged that it is an appropriate location for a high density development. As detailed in the relevant sections of this report, the design of the proposal is of a high quality, responds appropriately to its context, and delivers a range of private and shared amenity spaces, with a large proportion of ground-floor duplex units. In that context, the density of the proposal is acceptable in accordance with strategic policy.

Children's play space and amenity

29 London Plan Policy 3.6 seeks to ensure that development proposals include suitable provision for play and recreation. Further detail is provided in the Mayor's Shaping Neighbourhoods: Play and Informal Recreation Supplementary Planning Guidance. Using the methodology within the Mayor's SPG, the development is expected to be home to approximately 62 children, 27 of which are expected to be under five years old. In accordance with the Mayor's SPG, the development is therefore required to provide, as a minimum, 270 sq.m. of door-stop play provision for the under five's.

30 As discussed above, the applicant has provided a series of communal amenity spaces, which together total 905 sq.m. In recognition of the greater number of children expected as part of the affordable element (24 of the 27 under five's are expected to be housed within the affordable provision), the communal roof-top terrace provided for the affordable units is considerably larger than that for the private units, at 293 sq.m. This terrace has been designed so as to provide dual-use general residential amenity space, as well as play space, with the landscape design utilising natural features to facilitate play.

31 The applicant has further identified a number of existing areas of green amenity spaces within the vicinity of the site, which can provide play opportunities for residents of this development, particularly the older children. The Council should identify whether it is necessary to secure a financial contribution from the applicant towards the provision of additional, or improved, facilities in the local area.

Urban design

32 Good design is central to all objectives of the London Plan. The proposed scheme is generally well designed, providing a good mix of high-quality residential typologies that will contribute positively to the character of the area. The scheme creates a strong building line and good quality active street frontage onto Camden Road, St Pancras Way and Rochester Place, providing a good level of enclosure and definition to the surrounding public realm, particularly given the relatively narrow depth of the site. As detailed within the residential quality section of this report, the provision of duplex units provides a traditional residential environment at ground level, populated by individual entrances, in addition to communal flat access points.

33 The proposed breaks to the building mass facing St Pancras Way and Rochester Place will improve levels of light within the courtyards, which is welcomed, and, as illustrated by the submitted views accompanying the application, these breaks have been appropriately sized and designed so as not to undermine the quality of the enclosure and frontage on to the corresponding streets.

34 The proposed height of the building, which rises to a five-storey shoulder height, with two-set back storeys, is acceptable, and responds appropriately to the surrounding context. The applicant's townscape and visual impact assessment demonstrates that the proposal does not adversely impact on any of the conservation areas located in the immediate vicinity of the site. Furthermore, the development falls below the threshold height of the viewing corridor for strategic view 2 (London Panorama: Parliament Hill), as identified in the London View Management Framework Supplementary Planning Guidance.

35 The simple massing creates an elegant and legible building form, which has been detailed with perforated metal, simple metal, and glass balustrades. The residential entrances have been appropriately signposted through the use of a contrasting weathering steel, which is also utilised on the set-back elements, providing a playful and welcomed contrast and detail to the largely brick form. The result is a robust and high-quality residential building, which is strongly supported.

Inclusive design

36 In accordance with the London Plan, the applicant has demonstrated on plan that all of the residential units have been designed to meet Lifetime Homes standards, and 10% have been designed so as to be wheelchair accessible, which is supported.

Climate change

Climate change adaptation

37 The proposal includes a number of measures in response to strategic policies regarding climate change adaptation, which are welcomed. Measures proposed include rainwater harvesting, biodiverse roofs, use of low energy lighting and energy efficient appliances, metering, high levels of insulation, and low water use sanitary-ware and fittings.

Climate change mitigation

38 The applicant has broadly followed the London Plan energy hierarchy to reduce carbon dioxide emissions. An appropriate range of passive design features, and demand reduction measures, have been included to reduce the carbon dioxide emissions of the development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include mechanical ventilation with heat recovery, and improved thermal

bridging. The demand for cooling will be minimised through solar control glazing and internal blinds for shading.

39 The applicant has demonstrated that there are no existing, or planned, district heating networks within the vicinity of the proposed development. However, the applicant has committed to ensuring that the development is designed so as to allow for future connection to a district network, should one become available.

40 The applicant is proposing to install a site-wide heat-network, supplied from a single energy centre. The applicant should confirm that the network will serve all of the residential units, and provide a schematic demonstrating sufficient space has been allocated within the energy centre for the proposed plant.

41 The applicant is proposing to install a 70 kWe gas fired combined heat and power unit, sized to provide the domestic hot water load, as well as a proportion of the space heating. Given the scale of the scheme, the applicant should provide further information regarding how, and by whom, the combined heat and power unit, and electricity sales, will be managed.

42 The applicant has investigated the feasibility of a range of renewable energy technologies, and is proposing to install 130 sq.m. of photovoltaic panels on the roof of the development. A roof plan showing the proposed location of the panel installation has been provided.

43 An overall reduction of 83 tonnes of carbon dioxide regulated emissions compared to a 2010 Building Regulations compliant development is reported to be achieved through all the measures outlined above, equivalent to an overall saving of 41%. This percentage saving exceeds the London Plan target, and is supported.

Transport

44 TfL welcomes the car free nature of this development, aside from the provision of two on-street spaces for Blue Badge holders, in line with London Plan Policy 6.13. TfL recommends that the accessible spaces are equipped with active electric vehicle charging points, provision of which should be secured through planning condition. TfL also recommends that future occupants of the site be excluded from eligibility for on-street car parking permits within the existing controlled parking zone. This should be secured through the section 106 agreement.

45 TfL welcomes the applicant's commitment to provide 296 cycle spaces on site, which is in accordance with London Plan Policy 6.9. The nearest cycle hire docking station is located approximately 200 metres to the south of the site. This docking station is at the northern boundary of the cycle hire scheme, and as such is well used. The proposed development may lead to a further increase in demand for cycle hire usage. Therefore, the applicant should explore with TfL either contributing towards installing a new docking station, or increasing the size of an existing station.

46 TfL is satisfied that, given the number of forecast trips resulting from the proposals, the likely impact on the capacity of the highway network, London Overground services, and the bus network is acceptable, in accordance with the London Plan Policy 6.3. However, TfL requests that a planning obligation be imposed requiring the applicant to enter into a section 278 agreement under the Highways Act 1980, with TfL for any highway works on TfL's highway associated with the development, including, but not limited to, the proposed footway renewal on the Camden Road frontage. The detailed scope of the works will be determined when the applicant approaches TfL to engage in the section 278 process.

47 As part of TfL's modernisation programme to upgrade bus infrastructure for passengers, and given that it will directly benefit future occupants of the site, TfL also requests £15,000 to upgrade

bus shelter (0107/0110) at bus stop 331 (F), located approximately 100 metres to the south of the site on Camden Road, in accordance with London Plan Policy 6.2. The delivery of the bus shelter should be secured via the section 106 agreement. A contribution towards financing the installation of Legible London signs to enhance the way finding capability for pedestrians in this area, and encourage sustainable travel, is also sought. For information, a pair of Legible London signs cost £15,000, and the agreed sum will need to be secured through the section 106 agreement. The number of signs necessary should be determined in consultation between TfL and the Council.

48 TfL requests that construction activity is not undertaken from Camden Road, given its strategic function, but from other surrounding roads. TfL also notes there are several trees along the site frontage located on the public highway. Whilst it is noted these trees are not to be removed as part of the redevelopment of the site, it remains unclear how they will be impacted upon during demolition and construction. TfL requires details of how the erection of hoarding, scaffolding and similar activities will impact upon the trees, which should be detailed in the construction logistics plan.

49 The residential travel plan should be secured through a section 106 agreement, and a construction logistics plan, and delivery and servicing plan should also be secured by condition, to be approved by the Council in consultation with TfL.

50 The Mayor has introduced a London wide Community Infrastructure Levy (CIL) to contribute towards the funding of Crossrail. The rate for Camden Council is £50 per square metre (gross internal area). The required CIL should be confirmed by the applicant and Camden Council once the components of the development have been finalised.

Local planning authority's position

51 The Council has yet to consider a report on this application at its planning committee.

Legal considerations

52 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

53 There are no financial considerations at this stage.

Conclusion

54 London Plan policies on employment, housing, urban design, inclusive design, climate change, and transport are relevant to this application. Whilst the principle of the redevelopment of this site for housing, is supported, at this stage the application does not comply with the London Plan. Further discussion is therefore required regarding the following issues:

- **Housing:** in the absence of a financial viability report, it is not possible at this stage to determine whether the proposal fully accords with London Plan Policy 3.12. A full financial viability assessment should therefore be provided. The applicant is also strongly encouraged to increase the proportion of affordable family accommodation in accordance with the Council's planning guidance. Furthermore, the applicant should provide a detailed accommodation schedule demonstrating that all units meet the space standards in accordance with London Plan Policy 3.5.
- **Climate change mitigation:** the applicant should provide details of the proposed operation and management of the combined heat and power system, and electricity sales. Confirmation that all of the residential units will be served by the site-wide heat-network, and a schematic of the energy plant room, should also be provided.
- **Transport:** the applicant should ensure that the two on-site parking spaces are served by electric vehicle charging points, and that no construction activity is undertaken from Camden Road. Further discussions are also required regarding possible improvements to cycle hire provision in the vicinity of the site, financial contributions towards bus stop improvements, and Legible London, in addition to Community Infrastructure Levy requirements. The provision of a construction logistic plan, delivery and servicing plan, and a residential travel plan should all be secured by the Council.

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