

Liddell Industrial Estate, West Hampstead

in the London Borough of Camden

planning application no. 2014/7651/P & 2014/7549/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

The proposal is formed of two linked applications:

Application 1: Phase 1 of a comprehensive, mixed-use redevelopment of the site involving demolition of existing buildings, site clearance and site preparation works. Construction of new school buildings for Kingsgate Primary School, creation of a new access road, associated car parking and implementation of temporary landscaping works.

Application 2: Phase 2 of comprehensive, mixed-use redevelopment involving the construction of three new buildings - Block A (5 storeys) to provide 3,700 sq.m. (GIA) of mixed commercial use (Class B1), Block B (11 storeys) and Block C (5 storeys) to provide 106 mixed tenure residential units (Class C3) and associated public realm landscaping works.

The applicant

The applicant is the **London Borough of Camden**, the architect is **Maccreanor Lavington**, and the agent is **Tibbalds**.

Strategic issues

The proposed residential and school redevelopment is strongly supported in strategic planning terms; however issues with respect to **mixed use and employment space, affordable housing, housing, urban design and tall buildings, inclusive design, transport and climate change** should be addressed before the application is referred back to the Mayor at his decision making stage. Issues with respect to **town centre uses** and **education** are also relevant to the application.

Recommendation

That Camden Council be advised that while the application is generally acceptable in strategic planning terms, it does not yet comply with the London Plan, for the reasons set out in paragraph 82 of this report; but that the possible remedies set out in that paragraph could address these deficiencies.

Context

1 On 22 January 2015, 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 4 March 2015 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 Categories 1B1(c) and 1C1(c) of the Schedule to the 2008 Order:

- *1B1(c) "Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings - outside Central London and with a total floorspace of more than 15,000 square metres.*
- *1C1(c) "Development which comprises or includes the erection of a building of more than 30 metres high and is outside the City of London.*

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 1.1 hectare site is bounded by a strip of public open space and Maygrove Road to the south; the Thameslink rail line to the north; a National Rail owned site to the east, including an operating signal box; two commercial properties adjacent to the south-east; and Maygrove Peace Park to the west, with a multi-use games area (MUGA) immediately adjacent to the site. Pedestrian and vehicular access is via Liddell Road, which runs through the centre of the site, accessed from Maygrove Road, forming a cul-de-sac. Mature trees are located along the Maygrove Road bank and Liddell Road. The site is currently occupied by 33 single storey light industrial units. An electricity substation is located on the site adjacent to the current access from Maygrove Road. There is a significant level change of approximately 4.5 metres from south to north, between the Maygrove Road edge of the site and the edge adjacent to the railway.

6 More widely, other than commercial and light industrial uses along the railway line to the east and west, the area is made up of residential streets lined by low rise terraced houses with rear gardens. Some former commercial sites are being developed with larger scale residential uses, including a site approximately 100 metres to the south, containing buildings of between eight and twelve storeys. The existing Kingsgate School lies approximately 500 metres to the south of the site.

7 West Hampstead town centre, a district centre, lies approximately 300 metres to the east of the site. Kilburn town centre, a major centre, lies approximately 300 metres to the south-west of the site. At a similar distance to the north-east and south-east are two Conservation Areas (West End Green and South Hampstead).

8 The site is distant from the Transport for London route network; Finchley Road being just under a kilometre away to the east, and the nearest strategic route network is some 530 metres to the west, at Shoot Up Hill. The site benefits from a very good public transport accessibility level (PTAL 5, of a scale of 1 to 6 in which 6 is the highest). It is less than 400 metres from three separate stations at West Hampstead; underground (Jubilee line), rail (Thameslink and Southeastern) and Overground (North London Line). To the west there are two further stations within reasonable walking distance; Kilburn (Jubilee line) and Brondesbury (Overground). West End Lane is served by bus routes C11, 139 and 328. Liddell Road and the surrounding area is within a controlled parking zone.

9 Cycling infrastructure in the area is currently poor, with the nearest formal route extending along Finchley Road and a nearby section of West End Lane is marked as a signed cycle route.

Details of the proposal

10 The proposal involves a comprehensive, mixed-use redevelopment of the site. Application 1 forms Phase 1, covering the entire site and involving the demolition of the existing buildings, site clearance and site preparation works. New buildings for Kingsgate Primary School will be constructed to the north of the site, together with the creation of a new access road, associated car parking and the implementation of temporary landscaping works.

11 Application 2 forms Phase 2, covering the south and west of the site, involving the construction of three new buildings - Block A (5 storeys) to provide 3,700 sq.m. (GIA) of mixed commercial use (Class B1), Block B (11 storeys) and Block C (5 storey mansion block) to provide 106 mixed tenure residential units and associated public realm landscaping works.

Case history

12 On 18 December 2015, a pre-application meeting was held at City Hall for this application; however as the application had already been submitted, no pre-application advice note was issued.

Strategic planning issues and relevant policies and guidance

13 The relevant issues and corresponding policies are as follows:

- Mix of uses *London Plan*
- Employment *London Plan; Land for Industry and Transport SPG*
- Town centre uses *London Plan; Town Centres SPG*
- Education *London Plan*
- Housing *London Plan; Housing SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG*
- Affordable housing *London Plan; Housing SPG; Housing Strategy*
- Density *London Plan; Housing SPG*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG*
- Tall buildings/views *London Plan, London View Management Framework SPG*
- Inclusive design *London Plan; Accessible London: achieving an inclusive environment SPG*
- Transport *London Plan; the Mayor's Transport Strategy*

- Parking *London Plan; the Mayor's Transport Strategy*
- Crossrail *London Plan; Mayoral Community Infrastructure Levy; Crossrail SPG*
- Climate change *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*

14 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 2010 Camden Core Strategy and the 2011 London Plan (with 2013 Alterations).

15 The following are also relevant material considerations:

- The National Planning Policy Framework and the accompanying Planning Practice Guidance.
- The draft Further Alterations to the London Plan (FALP) – 'intend to publish' version as submitted to the Secretary of State, December 2014.

Principle of development

Residential development

16 London Plan Policy 3.3 'Increasing Housing Supply' recognises the pressing need for new homes in London and Table 3.1 gives an annual monitoring target of 889 per year for the Borough of Camden between 2015 and 2025 in the FALP. London Plan Policy 2.13 'Opportunity Aras and Intensification Areas' and Table A1.2 identify the West Hampstead Interchange Intensification Area as a significant transport interchange, with potential to improve connections and secure an uplift in development capacity through intensification. Although the site is just outside the Intensification Area, which lies approximately 100 metres to the east and the south, the residential provision is well placed to contribute to the identified minimum number of 800 new homes. In summary, the proposal for residential development would be consistent with London Plan policies and is supported in strategic planning terms.

Mixed use and employment space

17 London Plan Policy 4.1 'Developing London's Economy' provides strategic support for the provision of employment floorspace and Policy 4.2 'Offices' supports mixed use development with office provision to improve London's competitiveness.

18 The current buildings on the site comprise of 33 single storey light industrial units, providing 3,667 sq.m. (GIA) of commercial space, including car related uses and storage. The proposal includes a five storey building containing a slightly greater level of B1 managed commercial floorspace (3,729 sq.m.) targeted towards small creative and technology sector (micro to medium). The applicant's managed office space advisers recommended a building of this size, with flexibility allowing for various unit sizes, as being the most likely to find a buyer that will develop the site. The re-provision of floorspace is welcomed, and although the employment space will be of a different nature to that existing, it is recognised that B1 uses are more compatible with the school and residential uses and no local or strategic protections are in place for the current use.

19 The applicant states that the proposed development could provide 280 jobs, a significant increase on the 80 jobs provided by the existing uses, which is welcomed. It is understood that

existing tenants were advised some time ago and have started to vacate the units. The applicant should provide details of the support that will be offered to remaining businesses to relocate.

Town centre uses

20 London Plan Policies 2.15 'Town Centres', 4.3 'Mixed Use development and offices' and 4.7 'Retail and town centres' provide the strategic policy context relating to town centres. Further guidance is provided in the London Plan supplementary planning guidance 'Town Centres'.

21 The proposal includes a slightly greater level of commercial floorspace (3,729 sq.m.) than currently exists, providing a different type of commercial use, although remaining within the B Class use. This represents a significant amount of commercial space on a site that is not within a town centre, although it is within the NPPF definition of 'edge of centre' as "*outside the town centre but within 500 metres of a public transport interchange*". The NPPF states that when assessing applications for retail, leisure and office development outside of town centres, which are not in accordance with an up to date Local Plan, local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold, or if there is no locally set threshold, the default threshold is 2,500 sq.m.

22 However, Camden's Development Policies (2010) Policy DP13 requires redevelopment proposals for mixed use schemes on employment sites to maintain or increase the level of employment floorspace. Furthermore, it requires a design that will enable flexible use for a range of business purposes. The proposed floorspace incorporates tall floor to ceiling heights of over 3 metres; raised floors and exposed soffits to enable easy fit out; floorplates that allow easy subdivision for different sized units; energy efficiency measures that will be economically efficient; a large reception; meeting spaces; roof terraces; outdoor seating and cycle storage. The proposals therefore comply with requirements of the Local Plan and no impact assessment is required in this case. Furthermore, the provision of commercial floorspace is well located in relation to West Hampstead town centre, and in very close proximity to West Hampstead Interchange Intensification Area.

23 In summary, the provision of flexible B1 floorspace is acceptable in relation to London Plan policy and the NPPF.

Education

24 The NPPF gives the highest level of national policy support for school provision. London Plan Policy 3.18 'Education facilities' explicitly supports the expansion of education provision to address the current and projected shortage of primary school places. It also encourages the co-location of schools and housing to maximise land use and reduce costs.

25 It is understood that Camden's Children's, Schools and Families Department's intention is to maximise the revenue generating potential of this site, so that it funds the development of the school on the site, as well as contributing towards delivery of the Council's wider educational programme, as well as other core planning policy requirements such as affordable housing, as discussed in the affordable housing section below.

26 The existing Kingsgate Primary School, approximately 500 metres to the south, admits 60 pupils per year in two forms of entry, with 420 pupils in total. It currently has three bulge classes, which provide a temporary solution to demand for additional spaces. A continuing and rising demand for school places in this part of the Borough means that there is a pressing need to permanently expand the school. The Council considered a number of alternative options for expansion and this site was selected as it is large enough to accommodate a mixed use development, including residential housing for sale to fund the new school buildings. The proposal will expand the school to four forms of entry per year, an increase of 60 pupils per year or 420 in total, with infants and nursery provision re-located to the new building. The expanded child place provision, alongside the provision of modern educational facilities, is strongly supported.

27 The school grounds are intended to meet both educational and play provision, with a layout including an orchard at the entrance (also available for out of hours community use), dedicated nursery and reception play and learning areas, an all-age playground around the retained trees, growing area, ballgames area, sensory garden and a nature garden. The presence of the railway is reflected in the school playground with features including platforms (as stages), signals, station clocks, tracks, and periscopes enabling the trains to be viewed over the railway boundary wall. A rooftop play space will also be provided above the nursery. The proposed playground spaces will provide an imaginative and high quality environment and are supported.

28 In accordance with London Plan Policy 3.18, the proposal allows a degree of community use outside core school hours, including the hall and neighbouring open space at the front of the building. The proposals also include a dedicated space for adult training at the entrance to the school. This has the potential to generate valuable revenue for the school, as well as supporting community activities and is welcomed.

29 A Construction Management Plan details the phasing for the construction of the school (phase 1) followed by the workspace and residential buildings (phase 2). This demonstrates that appropriate steps will be taken to limit the impact of construction on the school following its occupation. Safe pedestrian routes for the school will be provided at the east and west end of the site together with an access road.

30 Having regard to the above, the proposed education facility is strongly supported in strategic planning terms.

Housing

Affordable housing

31 The proposal for the site is as follows:

	1 bed	2 bed	3 bed	Total
Social rent	1	1	2	4
Market	30	58	14	102
Total	31	59	16	106

32 London Plan Policy 3.9 'Mixed and Balanced Communities' seeks to promote mixed and balanced communities by tenure and household income. Policy 3.12 'Negotiating Affordable Housing' seeks to secure the maximum reasonable amount of affordable housing. The current proposals include 4 social rent units out of a total of 106, which equates to approximately 4% of the total. It is the applicant's intention that the receipt from the residential element will be used to cross-subsidise the delivery of the new school and £3 million will go towards an extension to the existing Kingsgate School and other off-site education provision through the Council's

community investment programme. Whilst GLA officers accept that the proposed cross-subsidy of the school presents a genuine constraint on the delivery of affordable housing in this case, any financial surplus beyond that required to enable the school would normally be subject to the requirements of London Plan affordable housing policy.

33 In order to ensure that the application satisfies the requirements of London Plan Policy 3.12 to provide the maximum reasonable amount of affordable housing, the applicant states that their approach, including the £3 million off-site education contribution, has been financially appraised and that consequently the maximum reasonable proportion of affordable housing that can be delivered on the site is four social rented units. London Plan Policy 8.2 'Planning Obligations' provides the strategic context for planning obligations and whilst affordable housing and transport are given the highest priority at the strategic level, the need for planning obligations to fund social infrastructure such as schools is also acknowledged as important. Given the strategic support for school provision, the proposal to fund the new school may be acceptable, subject to a financial viability assessment. Mindful of the Mayor's priorities for planning obligations and having regard to the nature of this scheme, and its potential to contribute towards the wider objectives of the Camden's schools delivery programme, in accordance with the aims of London Plan Policy 3.18, GLA officers do not object to such a surplus split in principle. However, the applicant's viability assessment, together with the results of an independent review, should be shared with the GLA before the application is referred back to the Mayor. GLA officers will update the Mayor on the findings of the review, and of any further negotiations, at the Stage Two decision making stage. The Council should provide clarification on how contributions will be secured.

34 London Plan Policy 3.11 'Affordable Housing Targets' requires that 60% of the affordable housing provision should be for social and affordable rent and 40% for intermediate rent or sale. However, in reflection of the small number of affordable units provided, the proposal for 100% social rent is accepted in this instance, subject to the outcome of the viability assessment.

Housing choice

35 London Plan Policy 3.8 'Housing Choice' encourages a choice of housing based on local needs, while affordable family housing is stated as a strategic priority. Policy 3.11 also states that priority should be accorded to the provision of affordable family housing.

36 Most of the market units are one and two bed, although 14% are three bed, and two of the four affordable units will be family sized, with access to private outdoor amenity space. The housing mix is acceptable, subject to the outcome of the viability assessment.

37 As required by Policy 3.8, the applicant has demonstrated that all residential units will be designed to Lifetime Homes Standard and that the wheelchair accessible homes meet the standards set out in the Housing SPG.

Density

38 London Plan Policy 3.4 'Optimising Housing Potential' states that taking into account local context and character, the design principles in Chapter 7 and public transport capacity, development should optimise housing output for different types of location within the relevant density range shown in Table 3.2. The site is within an urban location where the density matrix sets a guideline of 200-700 habitable rooms, or 45-260 units, per hectare for a PTAL of 4-6, although this is not applied rigidly and depends on the context, including characteristics such as transport, social infrastructure, and open space.

39 Considering the 106 units across the 0.6 hectare site for application 2, and reducing the site area to account for the commercial building, GLA officers calculate that the proposal will have a density of approximately 240 units per hectare, which is within the density range. Furthermore, the site is directly adjacent to Maygrove Peace Park and provides social infrastructure in the form of the proposed school. Consequently, the proposed density of the scheme does not raise any strategic concerns and is acceptable.

Children's play space

40 London Plan Policy 3.6 'Children and Young People's Play and Informal Recreation Facilities' seeks to ensure that development proposals provide access to inclusive, accessible and safe spaces, offering high-quality play and informal recreation opportunities. Further detail is provided in the Mayor's Supplementary Planning Guidance 'Shaping Neighbourhoods: Play and Informal Recreation', which sets a benchmark of 10 sq.m. of useable child play space to be provided per child, with under-5 child play space provided on-site as a minimum.

41 GLA officers calculate that the scheme will have a child yield of 13, requiring 130 sq.m. of play space and 70 sq.m. for under-fives. Informal doorstep play space for under-fives of 75 sq.m. will be provided between the tall residential block and the commercial building, featuring simple play equipment, such as stepping stones and spinning disks. The applicant proposes that Maygrove Peace Park, immediately adjacent to the site, will provide play space for older children, including the existing MUGA. This would meet the requirements of London Plan playspace policies; however the Council should confirm if financial contributions towards these facilities are required.

Urban design and tall buildings

42 The layout of the scheme is well considered and the blocks are arranged to reinstate a defined building line along Maygrove Road, which is welcomed. An area of flexible open space is aligned to form a new link into the neighbouring park, which will encourage pedestrian movement through the site and optimise activity within the proposed open space. The blocks are arranged to provide a good level of enclosure to the open space, while maximising active frontages, which is welcomed.

43 The school buildings are arranged to provide a secure environment for pupils with a well-defined and legible access route, which links teaching spaces with outdoor playspaces, enabling passive surveillance and easy way-finding for pupils. It is understood that all teaching spaces have been designed to meet the government's benchmark design guidance in terms of daylight/sunlight penetration, natural ventilation and space requirements, which is welcomed. Measures to mitigate noise and vibration from the railway have been fully considered and designed into the building's envelope and foundations. The positioning of the main teaching block alongside the railway enables the amount of south facing playspace to be maximised, with the northern frontage of the residential mansion block providing passive surveillance outside of school hours.

44 Residential quality appears high across the scheme, with the linear block implementing a simple mansion block typology, with well-defined and well distributed entrances to cores, and secure private outside space to ground floor units. The application drawings show refuse/cycle stores at the rear of the building, which helps to optimise the quality of the block's public facing frontage and south facing aspect; however this raises concerns regarding access to these areas from the communal cores. In contrast, the Design and Access Statement shows refuse stores at the front of the building. The location should be clarified and further information provided to

demonstrate how sufficient clearance is provided to allow for the movement of refuse bins and cycles through the cores and stairwells.

45 A high proportion of dual aspect units are achieved in the taller block; however there are a large proportion of single aspect units along the south facing edge of the mansion block. As discussed under 'climate change' below, the applicant should provide further information on how these units are designed to avoid overheating through shading or other responses, while maintaining an acceptable level of daylight/sunlight penetration.

46 Both blocks will have no more than four units per core, with the taller element in particular providing an efficient floorplate, with the core positioned against the north elevation to enable passive ventilation to communal areas.

47 The scale and massing of the development as a whole is broadly supported, with the five storey mansion block providing a sufficient level of enclosure to both the school and Maygrove Road, while maintaining a human scale to the street. Similarly, the workspace block has been designed to respond to the scale of the neighbouring workspace units, with added massing articulation to address the scale of the open space and provide visual delineation from the other uses within the masterplan. The eleven storey residential tower has been subject to a thorough local townscape analysis, which has helped to establish an appropriate scale, enabling the building to appear recessive from Maygrove Road and its location against the railway further mitigates its massing impact on existing residential development to the north.

48 The architectural response to the site is welcomed and implements a simple and refined language, with clean roof lines and high quality brick detailing. The mansion block draws on the traditional form and proportions of this typology, providing a formal and recognisable language to the public facing edge of the scheme.

Inclusive design

49 The aim of London Plan Policy 7.2 'An Inclusive Environment' is to ensure that proposals achieve the highest standards of accessibility and inclusion, not just the minimum.

50 The site includes variable gradients across the site. These are generally acceptable; however they are not consistent with the Housing SPG requirement for level landings every 0.5 metre rise and should be reconsidered. The Maygrove Road mansion block can be accessed from the east end by a short ramp, and from the west end via the shared access road. Further shared space is located in the open space between the school, taller residential building and the commercial space. This arrangement is generally acceptable; however the Council should secure the detailed landscape design to demonstrate that appropriate measures will be taken to ensure that shared spaces are safe and accessible, particularly for blind and partially sighted people.

51 The applicant has confirmed that all residential units will be designed to the Lifetime Homes standard and that 10% will be easily adaptable for wheelchair use, including market and affordable tenures, as required by London Plan Policy 3.8 'Housing Choice'. Wheelchair adaptable units are located at the eastern end of the mansion block, in proximity to the proposed Blue Badge resident parking space on Maygrove Road. The access core provides two passenger lifts, should one break down or require maintenance, one sized to accommodate mobility scooters. In total, ten market tenure wheelchair adaptable units of various sizes are provided on the ground to third floors of the east end of the mansion block and one three-bed social rent wheelchair accessible unit is provided on the ground floor of the shared tenure core.

52 The design of the commercial building provides good access arrangements for users from the primary entrance on the north of the building and the secondary entrance to the south east corner and a full passenger lift. Three accessible parking bays are provided immediately north of the building.

53 The design of the school demonstrates that there will generally be good access for disabled pupils, staff and visitors, as well as the wider community when using the school's facilities outside of school hours. However, the building is arranged over two floors and a platform lift is proposed providing access to the upper floor of the building. Although platform lifts are not excluded under Part D of Building Bulletin 102, this does not represent best practice. Accordingly the applicant should further consider the possibility of providing a full passenger lift.

54 As discussed under 'transport' below, the provision of Blue Badge parking is insufficient and should be reconsidered.

Transport

Car Parking and Access

55 The primary access to the development would be from a new managed entrance on Maygrove Road, at the western end of the site. This will act as the primary vehicle access to the different elements of the development for servicing, refuse collection, drop off/pick up and to disabled/visitor parking spaces. TfL supports the lack of general needs parking but not the lack of Blue Badge spaces on site. There will be two operational spaces for the school (as it will operate across two sites) and a further three spaces will be shared between Blue Badge holders and all other land uses. The Transport Assessment (TA) states that the "*shared space arrangement [is] to be confirmed*" but no update has been received.

56 London Plan standards require a minimum of one Blue Badge space per ten residential units. Consequently, five on-site Blue Badge spaces are required for residential and non-residential uses, preferably separated. Twenty percent of those spaces should be fitted with an electric vehicle charging point (EVCP), in line with the London Plan Policy 6.13, and there must be passive provision for a further 20% (residential) and 10% (commercial). The applicant should also consider the need for another car club space in addition to those nearby in Iverson Road.

57 Although it would be preferable to see details prior to determination, a detailed parking management plan should be secured by planning condition/obligation. This could form part of the travel plan. It is expected that the residential development will be subject to a permit-free agreement, secured in a Section 106 agreement or equivalent legal document.

Impact Assessment

58 Although the school will not have staff parking, the applicant should provide further justification for the assumption that all current car trips should be redistributed to other modes.

59 The TA predicts that the development will generate 94 vehicular trips in the peak hour, 90 during the first PM peak (finish of lessons) and 90 in the second PM peak. Whilst the majority of trips to school will be by sustainable modes, the commercial development is forecast to generate 80 trips in the AM peak, 86 in PM peak, and 100 trips in the PM2 Peak. The residential element will also generate 58 trips in the AM peak, 30 in the PM1 peak and 53 trips in the PM Peak.

Public Transport

60 Subject to clarification about school trip generation, TfL expects that the impact of the development can be accommodated on the bus, Underground and rail services in this area, including the cumulative impact with other committed schemes in West Hampstead. The applicant has noted however, that the northbound bus stop on West End Lane could incorporate a shelter with seating and real-time information. Camden Council is therefore requested to secure £10,000 to mitigate the impact of additional trips from this development.

Walking and Cycling

61 The applicant proposes a range of public realm and traffic calming measures to mitigate the impacts of this development, particularly movement to and from the school. This includes the relocation of an existing zebra crossing on Iverson Road, widening of footways and increased signage. These are welcomed as they will encourage sustainable travel. The proposal to improve permeability by creating a connection between the north-west corner of the adjacent park and Maygrove Road is also supported. A contribution of £15,000 is requested to install Legible London signage in the area to improve wayfinding.

62 The applicant acknowledges that cycling connections in this area are generally poor, with low priority given to cyclists within the existing highway network. Funding from TfL has recently been confirmed for the provision next year of a 'Pilot Quietway' route from Regents Park to Dollis Hill, which will improve conditions and signposting for cyclists along Maygrove Road and at nearby junctions. Camden Council's policy to improve conditions and signage for cyclists in this area is also supported.

Cycle Parking

63 The proposals include 182 on-site and 20 on-street cycle parking spaces. The applicant should increase the number of storage spaces in line with FALP standards. TfL welcomes further discussion about how this can be achieved within this development.

Construction, Servicing and Travel Plans

64 In order to manage travel demand and minimise any impacts on the wider highway network, the development should be supported by travel plans, delivery and servicing plans (DSPs) and construction logistics plans (CLPs), prepared in accordance with TfL's best practice guidance. The DSPs should address the issue of managing deliveries during school hours, in as much as there would be potential for vehicle/pedestrian/cycle conflicts. All the travel plans to be secured, managed, monitored and enforced through the section 106 agreement or equivalent legal document.

Community Infrastructure Levy

65 The Mayor has introduced a London-wide community infrastructure levy (CIL) to help implement the London Plan, particularly Policies 6.5 and 8.3. The Mayor's CIL will contribute towards the funding of Crossrail. The Mayor has arranged boroughs into three charging bands and the rate for Camden is £50 per square metre. The required CIL should be confirmed by the applicant and the Council once the components of the development have themselves been finalised.

Climate change

Energy

66 A range of passive design features and demand reduction measures are proposed to reduce the CO₂ emissions of the proposed 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 energy efficient lighting. The demand for cooling will be minimised through measures such as solar control glazing and internal blinds. However, the applicant should also conduct and provide dynamic thermal modelling using the guidance provided in CIBSE TM49 to demonstrate that the risk of overheating, without active cooling, has been minimised.

67 The development is estimated to achieve a reduction of 51 tonnes per annum (18%) in regulated CO₂ emissions compared to a 2013 Building Regulations compliant development from the first stage of the energy hierarchy ('Be Lean'). Sample DER and TER sheets and BRUKL sheets including efficiency measures alone (i.e. excluding CHP and PV) should be provided to evidence the carbon savings claimed.

68 The applicant has carried out an investigation and there are no existing district heating networks within the vicinity of the proposed development. The applicant has, however, provided a commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available, for example the West Hampstead interchange.

69 The applicant is proposing that central gas boilers are installed in phase 1 to meet the heat requirements of the school. This system would then connect to a site heat network in phase 2 of the development. The applicant is proposing that the site heat network installed in phase 2 will also supply the heat requirements of the residential units and connect to the workspace building. A drawing showing the route of the heat network linking all buildings on the site should be provided.

70 The site heat network will be supplied from an energy centre located in the basement of the taller residential block. The floor area of this proposed energy centre should be provided. The applicant should investigate the scope for including the main energy centre serving the site heat network in phase 1 of the development and provide the floor area of the phase 1 boiler room.

71 In phase 2 of the development, the applicant is proposing to install two 70kWth gas fired CHP units as the lead heat source for the site heat network. A reduction in regulated CO₂ emissions of 30 tonnes per annum (12%) is envisaged through this second part of the energy hierarchy ('Be Clean'). The applicant should provide information on the proposed sales strategy for the electricity produced by the CHP.

72 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install 120 sq.m. of PV panels on the roof of the school building as part of phase 1. As part of phase 2, a further 567 sq.m. of PV panels are also proposed for the roof of the residential and workspace blocks. Drawings have been provided showing the proposed layout of the PV within the development. An air source heat pump is also proposed to provide the majority of the heating and cooling requirement for the workspace building. A reduction in regulated CO₂ emissions of 51 tonnes per annum (24%) is envisaged through this third element of the energy hierarchy ('Br Green').

73 The applicant should provide monthly heat load profiles to show the amount of heat that will be provided by the air source heat pump, relative to the other heat sources (the CHP and the top-boilers).

74 Based on the energy assessment submitted, a reduction of 132 tonnes of CO₂ per year in regulated emissions, compared to a 2013 Building Regulations compliant development is expected, equivalent to an overall saving of 45%. The CO₂ savings exceed the targets set within Policy 5.2 of the London Plan. Considered in isolation, phase 1 (the school) also meets the 35% CO₂ reduction target.

Climate change adaptation

75 A flood risk assessment has been undertaken, which confirms that the site is within Flood Zone 1. The assessment states that the development will meet greenfield run-off rates up to the 1 in 100 year, plus climate change, storm occurrence. This is particularly important as there are areas in the nearby vicinity that are at risk of surface water flooding.

76 The detailed specification of design responses has yet to be finalised but the assessment states that these are likely to include permeable paving to areas such as the school playground, cellular attenuation tanks, linear planting strips, and 'Stockholm' tree planting. A green roof is also proposed on the school hall. These measures are generally likely to be suitable. The applicant may also wish to consider further green, brown or blue roofs and consideration could also be given to temporary storage of surface water for the more infrequent storms on areas such as the playground.

77 The overall approach is considered to be compliant with London Plan Policy 5.13 on sustainable drainage and the detailed measures should be secured via an appropriate planning condition.

Local planning authority's position

78 Camden Council's Planning Committee will consider the application on 3 March 2015.

Legal considerations

79 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.

80 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

81 There are no financial considerations at this stage.

Conclusion

82 London Plan policies on mixed use and employment space, town centre uses, education, affordable housing, housing, urban design and tall buildings, inclusive design, transport and climate change are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:

- **Mixed use and employment space:** The re-provision of the existing employment floorspace as part of the mixed use scheme is supported in strategic planning terms; however the applicant should provide details of the support that will be offered to existing businesses to relocate.
- **Town centre uses:** Although not within a town centre, the provision of flexible B1 floorspace is acceptable in relation to London Plan policy and the NPPF.
- **Education:** The expanded child place provision, alongside the provision of modern educational facilities, is strongly supported. The proposed playground spaces will provide an imaginative and high quality environment and are supported. The school allows for a degree of community use outside core school hours, which is welcomed. Appropriate steps will be taken to limit the impact of construction on the school following its occupation.
- **Affordable housing:** Given the strategic support for school provision, the proposal may be acceptable subject to an independent review of the applicant's financial viability assessment, which should be shared with the GLA before the application is referred back to the Mayor. The Council should provide clarification on how contributions towards off-site education will be secured. The split of affordable housing is accepted in this instance, subject to the outcome of the viability assessment.
- **Housing:** The proposal for residential development would be consistent with London Plan policies and is supported in strategic planning terms. The housing mix is acceptable, subject to the outcome of the viability assessment. All residential units will be designed to Lifetime Homes Standard and the wheelchair accessible homes meet the standards set out in the Housing SPG. The provision of play space is acceptable; however the Council should confirm if financial contributions towards these facilities are required.
- **Urban design and tall buildings:** The layout, massing, scale and architecture of the scheme is well considered. Further information should be provided on the refuse and cycle stores in the mansion block. Further information should be provided on how the single aspect south facing mansion block units re designed to avoid overheating.
- **Inclusive design:** Level landings should be provided for every 0.5 metre rise on pedestrian ramps. The Council should secure the detailed landscape design to demonstrate that appropriate measures will be taken to ensure that shared spaces are safe and accessible. All residential units will be designed to the Lifetime Homes standard and 10% will be easily accessible or adaptable for wheelchair use. The inclusion of a platform lift in the school does not represent best practice and the applicant should provide further information to explain the lack of a full passenger lift. Additional Blue Badge parking should be provided.
- **Transport:** The car free nature of the proposal is supported but five on-site Blue Badge spaces are required for residential and non-residential uses; 20% of spaces should be fitted with an electric vehicle charging point, with passive provision for a further 20% (residential) and 10% (commercial); a car club space should be considered; the residential development should be subject to a permit-free agreement; further justification should be provided for the assumption that school related car trips will be redistributed to other modes; and the number of cycle storage spaces should be increased in line with the FALP. Camden Council is requested to secure £10,000 to mitigate the impact of additional trips and £15,000 to

install Legible London signage. All travel plans should be secured, managed, monitored and enforced through the section 106 agreement or equivalent legal document.

- **Climate change:** The CO2 savings exceed the targets set within Policy 5.2 of the London Plan; however the applicant should provide dynamic thermal modelling; sample DER, TER sheets and BRUKL sheets; a commitment to ensuring that the development is designed to allow future connection to a district heating network; a drawing showing the route of the heat network; the floor area of the proposed energy centre; scope for including the main energy centre serving the site heat network in phase 1 of the development; the floor area of the phase 1 boiler room; information on the proposed sales strategy for the electricity produced by the CHP; monthly heat load profiles. The proposals are acceptable in flood risk and drainage terms and comply with London Plan Policies 5.12 and 5.13.

83 On balance, the application does not yet comply with the London Plan.

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