

# 9 Planning Statement

## 9.1 Introduction

The previous sections of this document have described the evolution of the proposals through the feasibility and pre-application stages of the planning process, this section of the PDAS now sets out an assessment of the proposed development against the prevailing adopted and emerging planning policies.

### Description of the proposals

The Regent's Park Estate is a large post-war estate in Camden located very close to Euston station. The proposals for the Government's High Speed 2 Rail link will have a major impact on the estate, in particular near to the northern and eastern boundaries. Three existing council-owned housing blocks ('the red blocks') and a number of homes on nearby Melton and Cobourg streets will need to be demolished in order to allow for the construction of the high speed railway tracks and expanded Euston Station. There are four additional blocks ('the yellow blocks') that have been identified by LB Camden as being 'at risk' due to their proximity to the HS2 construction works. Camden Council continue to push HS2 Ltd to ensure the construction impacts are fully addressed in advance of the HS2 works.

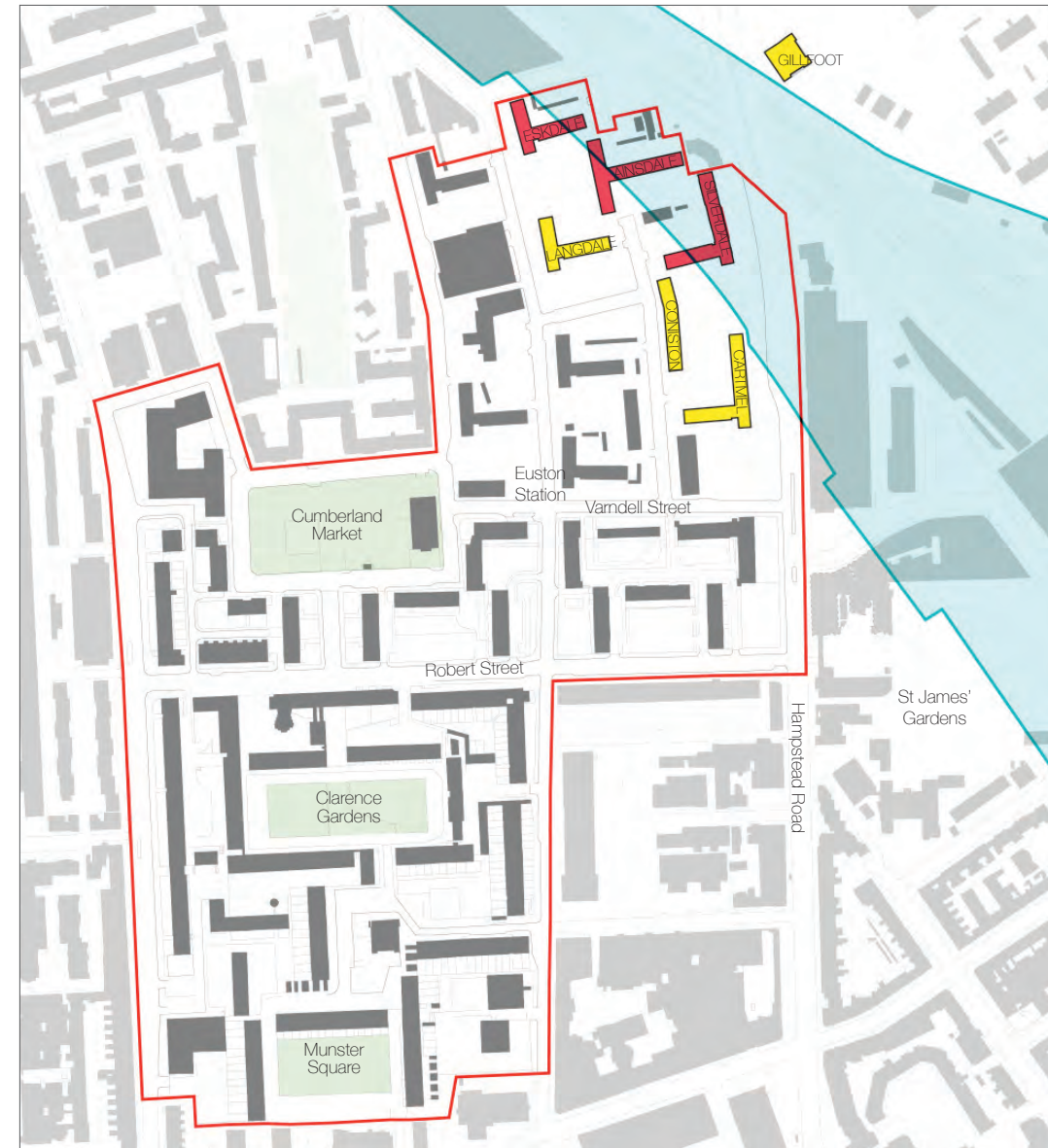
The principal purpose of this planning application is to apply for replacement mixed tenure residential development for residents who live in the affected housing blocks and a small amount of additional housing above that required for replacement homes. A commitment has been made to residents that they will only have to move once and as such these homes need to be built ahead of the date the affected blocks are due for demolition. The powers to build and operate the Government's HS2 scheme are being sought through the High Speed Rail Bill (HS2 Bill). The HS2 Bill seeks deemed planning permission for the railway and associated works meaning that the planning authority for HS2 is Parliament. The demolition of the existing residential blocks does not form part of this application and will be dealt with through the HS2 Bill. If HS2 does not go ahead for any reason and the replacement homes are not required then it is proposed that the new homes within the application would

be provided on a mixed tenure basis in accordance with planning policy.

The proposals are for eight blocks of mixed-use development ranging in size from three to eleven stories, predominantly as infill development. The proposals sit on a number of plots within the site boundary, these are as follows:

- Plot 1: Robert Street Car Park
- Plot 2: Former One Stop Shop
- Plot 3: Varndell Street Corner
- Plot 4: Newlands plot
- Plot 5: Dick Collins Hall
- Plot 6: Cape of Good Hope
- Plot 7: Camden People's Theatre (being applied for in a separate application)
- Plot 8: The Victory Pub
- Plot 9: St Bede's Mews

The proposals include the demolition of three small existing buildings within the site area to allow for the construction of three of the new blocks. The buildings proposed for demolition are the Dick Collins Hall, the Victory pub and the Cape of Good Hope pub (this building is now known by a different name, but for ease of reference it is still referred to as the Cape of Good Hope within this application). The proposals include the replacement of the existing community facility on Plot 5 (Dick Collins Hall) which will be relocated to the ground floor of the proposed block on Plot 1: Robert Street Car Park. The demolition of these buildings allows for a more efficient and well-designed form of building in these locations. New commercial space is proposed at the base of three of the proposed blocks (Former One Stop Shop, Newlands Plot and Victory Pub).



Plan to show HS2 affected 'red blocks' and 'yellow blocks' and the HS2 'safeguarding line'

- Buildings 'at risk' by HS2
- Buildings to be demolished for HS2
- Estate boundary
- HS2 Safeguarding zone



### Developing the proposals

The site is subject to a number of overlapping policy, environmental, urban design and physical considerations that have been carefully considered within the context of achieving the Council's social and community objectives for future development. Through the design and development process the London Borough of Camden's (LBC) Housing Authority and their design team has sought to work with these considerations and deliver a high quality response that strikes an appropriate balance between the need to deliver new and replacement homes and other strategic objectives.

A request for an Environmental Impact Assessment (EIA) screening opinion was sought from the Local Planning Authority to ascertain whether an EIA was required for the proposed development. Confirmation was received from the Local Planning Authority in February 2015 that the proposals did not constitute 'EIA development' within the meaning of the 2011 Regulations.

The proposals have been discussed in detail with Camden's Development Management officers via a programme of pre-application meetings and the feedback received has been built into the design development process. Pre-application advice was sought from the Greater London Authority (GLA) and feedback from this process has fed into the development of the design proposals.

In addition the team has consulted a number of other Council departments, other stakeholders and the wider community; including:

- Access officers and occupational health officers
- Building Control
- Parks and Open spaces
- The HS2 Core Team
- Estate managers and caretakers
- The local community via a series of public exhibitions and meetings

The SD5 PreApp Consultation Statement that accompanies this application explains the consultation process with residents in more detail. Consultation comments have generally been in favour of the proposals and the approach

### PLOT 5: DICK COLLINS HALL



**Phase: 2**  
**Location:** Corner of Redhill Street  
**Current Use:** Dick Collins community hall  
**Key Features:** Opposite Conservation Area and Listed Building

### PLOT 8: THE VICTORY PUB



**Phase: 2**  
**Location:** Corner of Albany Street and Nash Street  
**Current Use:** The Victory Pub  
**Key Features:** Opposite Conservation Area and row of mature trees on Albany St

### PLOT 9: ST BEDE'S MEWS



**Phase: 1**  
**Location:** car park next to St Bede's Hall  
**Current Use:** car parking  
**Key Features:** St Bede's is a listed building.

### PLOT 6: CAPE OF GOOD HOPE SITE



**Phase: 1**  
**Location:** Corner of Albany Street and estate access road opposite Swallowfield.  
**Current Use:** restaurant/bar  
**Key Features:** Opposite Conservation Area and listed buildings

### PLOT 4: NEWLANDS SITE



**Phase: 1**  
**Location:** Corner of Hampstead Rd and Varnell St.  
**Current Use:** Inaccessible green area.  
**Key Features:** Opposite HS2 proposed development.

### PLOT 2: RYDAL WATER SITE



**Phase: 1**  
**Location:** Corner of Hampstead Rd and Robert St  
**Current Use:** Unattractive, poorly used open space  
**Key Features:** Opposite HS2 proposed development.

### PLOT 3: VARNDELL STREET SITE

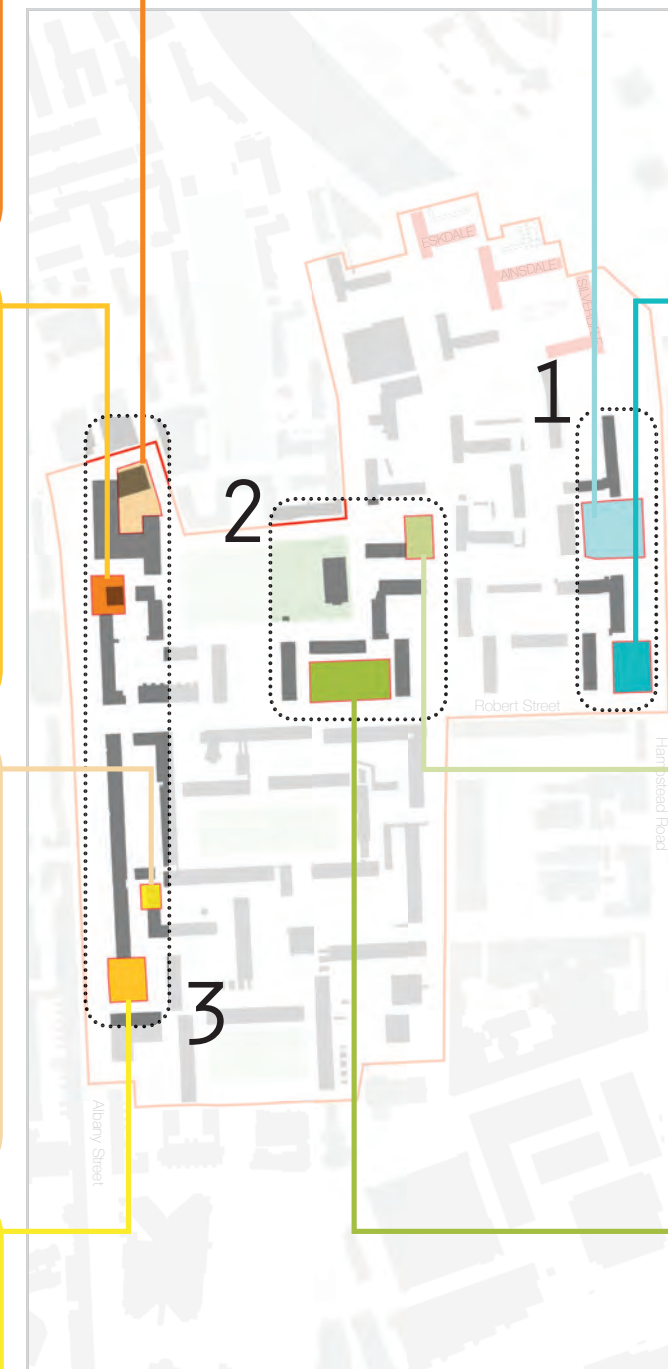


**Phase: 1**  
**Location:** Corner of Varnell St and Stanhope St.  
**Current Use:** Under-used grass area.  
**Key Features:** Interior estate site at junction facing taller resi buildings.

### PLOT 1: ROBERT STREET CAR PARK



**Phase: 1**  
**Location:** Robert Street  
**Current Use:** car parking  
**Key Features:** Prominent location on key east-west route across estate and to house new community centre



being taken to the re-provision of homes. Amendments have been made through the design process to respond to any concerns. These include the removal of some sites from the proposals, various aspects of the landscape proposals and detailed input into the design of the buildings.

The scheme has evolved through that process and consideration of the relevant planning policies is below under the following headings:

- The principle of development
- Design
- Open space
- Landscape, arboriculture and ecology
- Drainage and flooding
- Energy and sustainability
- Transport
- Impact on amenity of occupiers and neighbours
- Other environmental considerations
- CIL, Section 106 and other contributions

To avoid repetition across the various documents that support this planning application the relevant policies and guidelines relating to transport, energy and sustainability targets, air quality, flood risk, contamination and the amenity of surrounding properties are summarised as necessary in the documents that support the planning application.

## 9.2 The principle of development

The policy review in section 3 sets out that the Euston area is designated as an Opportunity Area within the London Plan and that the Euston Area Plan (EAP) provides the Development Framework for this area. The EAP is the most current and relevant policy when assessing the proposals for this area. In particular Strategic Principle EAP1 sets out the land use strategy for the area and identifies that the EAP area has the ability to accommodate between 2,800 and 3,800 additional and replacement homes.

Development Principle EAP5 is a site specific policy relating to the Regent's Park Estate which identifies a number of sites within the estate as 'A' sites which are prioritised for HS2 replacement homes. The eight plots proposed for development within the site boundary all fall within the 'A' sites and as such are supported by this policy.

Camden's overall approach to growth and development and its management are set out in CS1, CS5 and CS14 of the Core Strategy. These policies seek to deliver high quality, appropriate and sustainable development in accessible locations. Development is encouraged to provide facilities that are needed to support Camden's growing population, make the best use of land and provide a mix of uses in suitable schemes.

The following section justifies each of the proposed uses against the relevant policies.

## Residential use and amount

The proposals seek the development of 116 residential units developed in eight new buildings across the identified plots within the site boundary. These mostly take the form of small infill buildings that range in height from three storeys to eleven storeys.

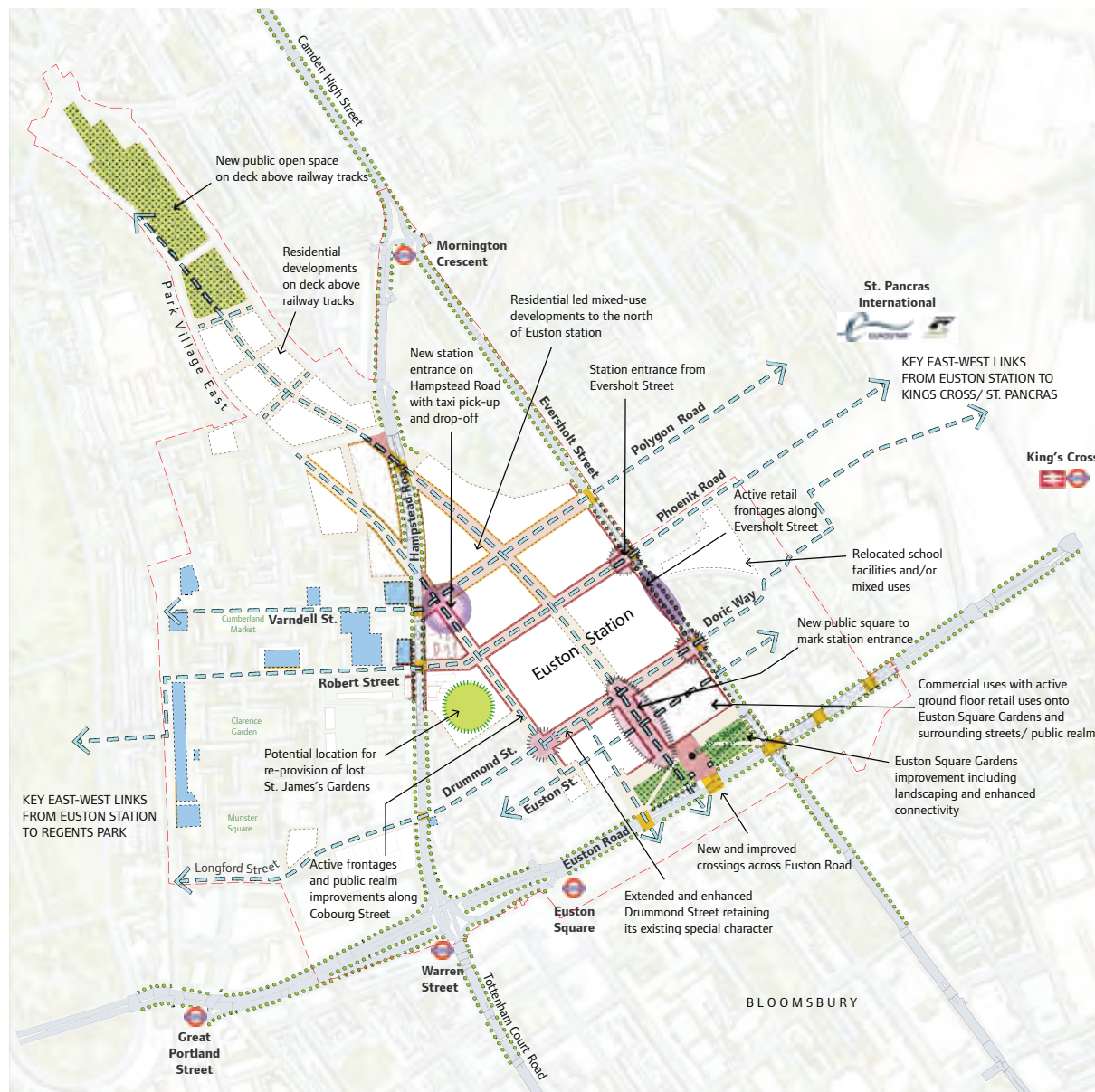
The majority of these new homes are designed to re-provide the housing need of the tenanted properties that will be demolished in the 'red blocks' and on nearby Cobourg Street if HS2 goes ahead. Due to concerns over the habitability of some homes adjacent to the HS2 construction zone it is proposed that a small allowance is made to cater for those worst affected. The proposals also re-provide homes for resident leaseholders in the red blocks and affected nearby street properties, these homes will be provided on a shared equity basis.

This application is not seeking to apply for the demolition of the existing housing as this will be dealt with through the HS2 Bill, however the details of the existing mix and tenure of these homes is outlined below and has been used to inform the development of the proposals.

### Existing unit and floorspace in the 'red blocks'

	Social Rented							Resident Leaseholders							Non-Resident Leaseholders					
	ST	1B	2B	3B	4B	5B	Tot	ST	1B	2B	3B	4B	5B	Tot	ST	1B	2B	3B	4B	Tot
Ainsdale	1	2	19	0	0	0	22	0	0	9	0	0	0	9	0	1	6	1	0	8
Eskdale	8	18	11	11	1	0	49	1	0	1	2	0	0	4	0	2	3	0	2	7
Silverdale	7	21	17	10	2	0	57	0	1	4	2	1	0	8	0	1	1	2	0	4
Cobourg and Melton Street	5	2	1	0	0	0	8	0	2	0	1	0	0	3	0	1	0	1	1	3
<b>TOTAL</b>	<b>21</b>	<b>43</b>	<b>48</b>	<b>21</b>	<b>3</b>	<b>0</b>	<b>136</b>	<b>1</b>	<b>3</b>	<b>14</b>	<b>5</b>	<b>1</b>	<b>0</b>	<b>24</b>	<b>0</b>	<b>5</b>	<b>10</b>	<b>4</b>	<b>3</b>	<b>22</b>
Assumed GIA per unit type (sq.m)	25	42	58	68	78			25	42	58	68	78			25	42	58	68	78	
Total GIA (sqm)	<b>6777</b>							<b>1381</b>							<b>1296</b>					<b>182</b>
	<b>8158</b>																			





- Key east-west and north-south links
- Indicative development blocks
- Main retail frontages
- Commercial / other active frontages
- ⊙ Station entrances
- ⊙ Potential taxi drop-off/pick up locations
- New / improved pedestrian / cycle crossings
- Replacement housing infill sites

Overall spatial concept illustration from the Euston Area Plan identifying replacement housing sites within the Regent's Park Estate

The proposals are designed to reprovide the assessed housing need of the current units rather than the exact mix of the accommodation there is at the moment. Housing need has been assessed based on survey information from the current households against Camden's new housing allocation policy.

Seventy replacement homes are to be provided with HS2 funding at the nearby Netley development which includes a new school and housing. The table below outlines the assessed housing need and mix and size of units to be reprovided by this scheme after the allocation of 70 of the replacement units to the Netley development. This mix of units has formed the basis of the brief for this project.

**Assessed housing need of tenants and resident leaseholders from the 'red blocks'**

Unit sizes	Social Rented						RESIDENT LEASEHOLDERS						Total units		
	st	1b	2b	3b	4b	5b	Tot.	st	1b	2b	3b	4b		5b	Tot.
Assessed housing need	0	66	39	23	7	1	136	0	4	14	5	1	0	24	160
Of which x must be wheelchair units		1	1												
Allowance for yellow blocks		3	1				4								4
<b>TOTAL</b>	<b>0</b>	<b>69</b>	<b>40</b>	<b>23</b>	<b>7</b>	<b>1</b>	<b>140</b>	<b>0</b>	<b>4</b>	<b>14</b>	<b>5</b>	<b>1</b>	<b>0</b>	<b>24</b>	<b>164</b>
Units reprovided at Netley	0	42	26	2	0	0	70	0	0	0	0	0	0	0	
Remaining number of units to be replaced based on housing need	0	26	15	21	7	1	70	0	4	14	5	1	0	24	94
Of which x must be wheelchair units		1	1												

The scheme provides a small number of additional homes above and beyond those required for the replacement housing in order to ensure that an amount of resilience is built into the replacement homes programme. They also provide flexibility to meet changes in household composition and any increase in demand from resident leaseholders as well as helping to meet the objectives of the Council's Core Strategy which aims to secure mixed, balanced areas with a sense of community, reduce polarisation and promote equality of opportunity and contribute towards the Borough's housing targets.

A summary of the two elements that make up this scheme is shown below:

	Social Rented							Intermediate Affordable							Private					
	ST	1B	2B	3B	4B	5B	T.	st	1b	2b	3b	4b	5b	T.	st	1b	2b	3b	4b	T.
<b>REPLACEMENT HOMES (proposed mix and tenure)</b>																				
Unit numbers	0	26	15	21	7	1	70	0	4	14	5	0	1	24						
Of which x are wheelchair units		1	1																	
Floorspace (GIA)	5627							1955												
% split of affordable floorspace	74%							26%												
<b>ADDITIONAL HOMES - Proposed mix and tenure schedule</b>																				
Unit numbers	0	2	1	1	1	2	7	0	2	2	1	0	0	5	0	1	1	8	0	10
Of which x are wheelchair units		1	1																	
Floorspace (GIA)	690							334							828					
% affordable to private	55%														45%					
% split of affordable floorspace								33%												
<b>TOTAL HOMES (replacement and additional)</b>																				
Unit mix and tenure	0	28	16	22	8	3	77	0	6	16	6	0	1	29	0	1	1	8	0	10
Of which x are wheelchair		2	2																	
Floorspace (GIA)	6317							2289							828					
% affordable to private	91%														9%					
% split of affordable	73%							27%												

London Plan Policy 3.14 seeks to resist the loss of affordable housing floorspace unless it is replaced with at least the equivalent floorspace. As demonstrated in the tables above the existing affordable floorspace that will be lost is 6777sq.m (GIA) of tenanted properties.

The proposals together reprovide 8606sq.m of affordable floorspace. This shows that there will be an increase in affordable floorspace as a result of the proposed development, this figure also does not take into account the units that are replaced at Netley which add a further 5411sq.m of affordable floorspace. Whilst this application does not apply for the demolition of the existing housing it is responsible for the replacement of the lost homes and as such has demonstrated that there is no net loss of affordable floorspace in accordance with policy.

#### Provision of affordable housing

The way the proposals have been planned six plots within the site boundary deliver the exact mix of replacement homes needed (including an allowance for the worst affected close to the HS2 construction zone), plus one additional unit.

The replacement units are as follows:

Plot no	Plot Name	REPLACEMENT HOUSING										Total
		Social Rented					Intermediate					
		1 beds	2 beds	3 beds	4 beds	5 beds	1 beds	2 beds	3 beds	4 beds	5 beds	
1	Robert Street Car Park	1	1	6	1			4				13
2	Former One Stop Shop	15	1 wc	2				6				24
3	Varndell Street		1	5	1	1						8
4	Newlands Plot	8	12	3	5			2		1		32
6	Cape of Good Hope	1		3			4	2	5			15
9	St Bede's Mews	1wc		2								3
	<b>Total units</b>	70					24					94
	<b>Floorspace (GIA) sq.m</b>	5627					1955					7582

This means that because the replacement tenanted homes are funded by the Secretary of State for Transport (SoS) this element of the proposals will be declared as a 100% affordable housing scheme in the following % split by floorspace and units:

- 5627sq.m (NIA) or 74% social rented floorspace (70 units)
- 1955sq.m (NIA) or 26% intermediate affordable floorspace (24 units)

It is proposed that the remainder of the residential units delivered above and beyond those required for the replacement homes are delivered as additional housing in line with the principles of other Community Investment Programme housing schemes. There are two plots that make up this portion of the development plus one additional unit from the Newlands Plot. The buildings would be mixed tenure and pepper potted in terms of size and tenure across the two plots delivering 22 units in the following mix of tenures and unit sizes:

Plot no.	Plot Name	ADDITIONAL HOUSING														Total	
		Social Rented					Intermediate					Private					
		1B	2B	3B	4B	5B	1B	2B	3B	4B	5B	1B	2B	3B	4B		
5	Dick Collins Hall		1 wc			2	1		1			1		5		11	
8	The Victory	1		1	1		1	2					1	3		10	
4	Newlands	1 wc														1	
	Total units	<b>7</b>					<b>5</b>					<b>10</b>				<b>22</b>	
	Floorspace	<b>690</b>					<b>334</b>					<b>828</b>				<b>1852</b>	
	Affordable / private split by floorspace	<b>1024</b>														<b>828</b>	<b>1852</b>

The additional housing part of the scheme delivers greater than the policy requirements for 50% affordable floorspace in the following proportions:

- 1024sq.m (NIA) of floorspace is affordable housing, equating to 55% of the total quantum of the additional homes floorspace.
- Of the affordable floorspace 67% is proposed to be social rented (690sq.m NIA) and 35% is intermediate floorspace (334sq.m) delivering 7 social rented units and 5 intermediate affordable units.
- 828sq.m of floorspace is private residential equating to 47% of the total quantum of the additional homes floorspace.

When the scheme is looked at as a whole the projects delivers the following split of affordable to private floorspace:

	TOTAL QUANTUM OF HOUSING (REPLACEMENT AND ADDITIONAL)															
	Social Rented					Intermediate					Private					Total
	1B	2B	3B	4B	5B	1B	2B	3B	4B	5B	1B	2B	3B	4B		
Total no of units	28	16	22	8	3	6	16	6	1	0	1	1	8	0	116	
Floorspace (sq.m)	<b>6317</b>					<b>2289</b>					<b>828</b>					
Affordable / private split by floorspace	<b>8606</b>										<b>828</b>					<b>9434</b>

- 91% of the scheme is provided as affordable floorspace of which 73% is social rented and 27% is intermediate.
- 9% of the scheme is private floorspace.

Policy CS6 states that housing is the priority land use of the Local Development Framework and Camden expects that an additional 12,250 homes will be provided in the Borough between 2010/11 and 2024/25.

The proposed mix of tenures exceeds the objectives of the London Plan and Camden's Core Strategy in relation to the delivery of affordable housing which only requires 50% of residential floorspace to be delivered as affordable.

If for any reason HS2 does not go ahead then the mix of tenures in the scheme will change so that the homes within this scheme are provided as:

- 50% affordable floorspace, includes both social rented and affordable; and
- 50% private floorspace.

A mechanism for dealing with either situation will be provided in the affordable housing plan in the Shadow S106 agreement that will accompany any future permission.



## Density

Policy DP2 of the Core Strategy confirms that the Council will seek to 'maximise' the supply of additional homes in the borough. In seeking to achieve this objective para 2.9 of the Council's Development Policies states that the Council will expect the density of housing development to take account of the density matrix in the London Plan (table 3.2) and to be towards the higher end of the appropriate density range. The site is defined as a Central Area and is highly accessible with a PTAL rating of 6b and hence a density of 650-1100 habitable rooms per hectare which is equivalent to a range of 140-405 dwellings per hectare is considered appropriate.

There are five existing buildings which are included within the site area. The breakdown of the unit mix and habitable rooms is as follows:

	st	hab rooms	1b	hab rooms	2b	hab rooms	3b	hab rooms	4b	hab rooms	
Swallowfield	12	12	2	4	20	60	10	40	0	0	
The Tarns	0	0	0	0	14	42	14	56	0	0	
Cartmel	7	7	23	46	23	69	4	16	12	60	
Rothay	0	0	22	44	0	0	24	96	4	20	
Mosedale	0	0	4	8	8	24	0	0	0	0	
<b>Total UNITS</b>	<b>19</b>		<b>51</b>		<b>65</b>		<b>52</b>		<b>16</b>		<b>203</b>
<b>TOTAL hab rooms</b>		<b>19</b>		<b>102</b>		<b>195</b>		<b>208</b>		<b>80</b>	<b>604</b>

In the context of the policy objectives to maximise the supply of homes the applicant has sought to optimise the potential of the sites within the technical, townscape and heritage constraints that are present. The methodology set out in the GLA's Housing SPG has been used to calculate the density for this scheme and is shown in the adjacent table.

Net site area:	2.52ha	
Proposed residential GIA:	9434sq.m	
Proposed non residential GIA:	767sq.m	
Number of proposed dwellings:	116	
Number of existing dwellings within site boundary:	203	
Dwelling mix within site boundary(existing and proposed units):	1bed:	105
	2bed:	98
	3bed:	88
	4bed:	25
	5bed:	3
Number of existing habitable rooms:	604	
Number of proposed habitable rooms:	428	

The application site comprises some 2.52ha and a total of 1032 habitable rooms and 319 units (new and existing) which equates to a density of 410hrh or 127 dwellings per hectare. This demonstrates that in terms of the habitable rooms per hectare the proposals are in accordance with the density matrix. The lower dwelling per hectare figure reflects the greater amount of larger units that are present on the estate and as such is acceptable.

## Housing choice / mix

Policy CS6 of the Core Strategy and London Plan Policy 3.8 sets out the priority for different sizes of units establishing that there is a preference for family sized housing (three plus bedrooms) within the affordable housing provision of new developments. The Council have identified priorities for different tenure housing through Policy DP5. This policy sets out the dwelling size priority in the form of a table as follows:

	Dwelling size priorities table				
	1 bed (or studio)	2 bed	3 bed	4 bed or more	Aim
<b>Social rented</b>	lower	medium	<b>high</b>	<b>very high</b>	50% large
<b>Intermediate affordable</b>	medium	<b>high</b>	<b>high</b>	<b>high</b>	10% large
<b>Market</b>	lower	<b>very high</b>	medium	medium	40% 2 bed

As described earlier the replacement homes element of the scheme has been designed to meet the assessed housing need of the households that currently occupy the red blocks and the affected homes on Melton and Cobourg Street that they are being relocated to these sites.

The proposed unit mix for the replacement homes social rented units are as follows:

	1 beds	2 beds	3 beds	4 beds	5 beds
<b>Replacement homes</b>					
Social rented	37.1%	21.4%	30.0%	10.0%	1.4%
Intermediate	16.7%	58.3%	20.8%	0.0%	4.2%
<b>Additional homes</b>					
Social rented	28.6%	14.3%	14.3%	14.3%	28.6%
Intermediate	40.0%	40.0%	20.0%	0.0%	0.0%
Private	10.0%	10.0%	80.0%	0.0%	0.0%

This demonstrates that 41.4% of the social rented replacement homes are provided as large family units. This falls slightly below the aim set in the priority table for 50% larger homes. The intermediate provision in the replacement homes provides 4.2% larger homes, which falls slightly short of the aim of 10% set in the priority table. This element of the proposals has been designed to meet a very specific mix set by the housing need of the affected homes. This principle has been discussed and agreed with Camden planning officers during pre-application discussions and as such these slight deviations from the priority table are acceptable.

In the additional homes portion of the scheme the social rented element is providing 57.1% larger units, which exceeds the aims set in the priority table. The intermediate element of the additional homes is providing 20% larger units which also exceeds the aims set out in the table. The private accommodation is providing a range of unit sizes which will contribute towards a mixed and balanced community across the estate. The proposals as a whole have been designed to provide a broad mix of unit types and sizes to help promote sustainable communities, the figures above demonstrate that the proposals are in accordance with policy and successful at achieving this aim.

## Provision of wheelchair accessible homes

Policy DP6 states that 10% of new homes should either meet wheelchair housing standards, or be easily adapted to meet them. The additional homes element of the scheme delivers two social rented wheelchair units, which equates to 10% of the units in this portion of the scheme being delivered as wheelchair units.

Within the replacement homes two social rented, fully wheelchair accessible units have been designed to meet the specific need of the existing users. The units have been designed to be in accordance with the key criteria set out in the Camden Wheelchair Housing Design Guide and have been discussed with Camden's access officer and occupational therapist.

In addition a further seven units are identified within the replacement homes provision to have the ability to be converted to a wheelchair home should the need requirements change in the future. The identified units and their alternative layouts are explained further within section 6 of this document.

In total this means that 10% of the replacement homes will be either delivered as a wheelchair home or easily adapted to be one. This is in accordance with policy requirements and the principle has been discussed and agreed with the access officer during pre-application discussions.

## Community facilities / social infrastructure

London Plan Policies 3.1 and 3.16 seek to ensure that development proposals protect and enhance facilities that meet the needs of particular groups. In addition Core Strategy Policy CS10 and Development Management Policy DP15 set out Camden's approach to Community Facilities and services. These policies state that the loss of existing community facilities will be resisted unless a replacement facility that meets the needs of the local population is reprovided. The proposals for this application include the demolition of the existing Dick Collins Hall and its replacement and enhancement in a more accessible part of the estate.

The replacement Dick Collins Hall will be reprovided on a like for like basis in terms of the quantum of floorspace on the ground floor of the proposed block at Robert Street Car Park. The existing hall measures 330sq.m (GIA) and the new hall at Robert Street measures 334sq.m (GIA) representing a small increase in floor space. The new space has been designed to improve on the existing facilities and to be an inclusive and flexible space that can be used by a wider section of the community than the existing hall. The new hall has a number of spaces that can be used separately, effectively opening it up for more efficient use. It is designed to meet the needs of existing and new residents. The space has been designed in consultation with the Regent's Park Tenants and Residents Association and has also been presented to the wider community at public consultation events.

The Silverdale TRA hall is an existing hall that is located at the base of the red blocks and will need to be demolished as part of the construction works associated with HS2. The demolition of this hall will be applied for in a similar way to the demolition of the housing blocks, through the HS2 Bill. The Silverdale Hall is not currently used as a TRA hall and is used as a Motorcycle Club. There is a requirement for HS2 to replace the Motorcycle Club use elsewhere and as such the replacement of this facility does not form part of this application.

The Council is currently undertaking a review of its tenant and resident association (TRA) halls. The purpose of the review is to assess the need for community spaces and accommodation and update lease and letting arrangements where necessary. The Council is seeking to consolidate TRA facilities and where possible consolidate smaller facilities into better, larger facilities as this allows more flexible

spaces that can accommodate a greater number of users and is easier from a management perspective.

The Council's Tenants and Leaseholder Engagement Team will be looking to enter into a lease with the Regents Park TRA for the new facility on a basis where the Council would cover the cost of rent, insurance, utilities etc. on agreement that the TRA provides free to access for other communities groups using the hall.

The proposals for the replacement of the existing community facility are therefore policy compliant.

Policy DP15 sets out that the Council will resist the loss of local pubs that serve a community role (for example by providing space for evening classes, clubs, meetings or performances). The Victory pub is proposed for demolition, the pub is small and has no facilities for serving a community role and as such its loss is in accordance with this policy. The Cape of Good Hope is no longer in pub use and is now used as a restaurant / bar and therefore represents no loss of community space. The proposals in relation to the loss of the pub spaces are policy compliant.

## Commercial space (A1 / A3 / A4)

The proposals include a number of small-scale commercial units on key plots within the site area. These relate to the following proposals:

- 162.0sq.m of commercial space at the ground floor of the Former One Stop Shop block, likely to be used for small scale retail uses.
- 91.0sq.m of commercial space at the ground floor of the Newlands block, likely to be used as small scale retail or café uses.
- 179.5sq.m of commercial space at the ground floor of the Victory block proposed to be used as a replacement pub use.

Policy CS7 of the Core Strategy states that the Council will encourage retail / commercial development that is proportionate to its location. There is provision within the policy to allow for 'limited provision of small shops outside local centres to meet local needs'. The commercial proposals here are for smaller units that in the changing context of the new Euston station will serve an important purpose and help to support the existing Neighbourhood Centre at Robert Street.



## 9.3 Design

The Mayor's objectives for London include for it to be: 'a city of diverse, strong, secure and accessible neighbourhoods...' and a place that...'delights the senses and takes care over its buildings and streets...' Policy 7.1 of the London Plan provides guidance on building neighbourhoods and communities. It states that places should be designed so that their layout, tenure, and mix of uses interface with surrounding land and improve people's access to social and community infrastructure.

The policies advise on the need for developments to create inclusive environments where buildings, streets and open spaces respond positively to the pattern and grain of a place, have a human scale and can contribute to establishing an enhanced character for the future function of the area.

Core Strategy policy CS14 and Policy DP24 require all developments to be of the highest standard of design and to consider the character, setting, context and the form of the neighbouring buildings. This includes consideration of good quality materials, the provision of visually interesting frontages at street level and consideration of the existing natural features of a site, such as the topography and existing trees. It also includes the requirement for the provision of appropriate hard and soft landscaping and the provision of appropriate amenity space and ensuring that developments are accessible.

This design and access statement has described the prevailing character of the estate and also its likely changing context in relation to the proposals for HS2. The estate is also wrapped by the Regent's Park Conservation Area at its western and northern boundaries. None of the proposals are within the boundary of the CA however their impact on the CA has been assessed within the Heritage Statement and also within a visual impact assessment (section 6 of this document) submitted as part of this application. The Statement identifies that the proposals will help to reinforce and enhance the historic street pattern, improving legibility across the estate.

The Euston Area Plan also sets a number of specific design criteria for the Regent's Park Estate, these are set out earlier in this Planning, Design and Access statement. The

proposals are in conformity with the design principles set out and will help to achieve the following key outcomes:

- The designs help to support the historic street pattern and help to define the public or private nature of spaces around the estate.
- Key links through the estate will be enhanced through the addition of new development, in particular the east-west routes of Robert Street and Varndell Street are better defined.
- The proposals have doors and windows which provide overlooking and surveillance of streets and spaces where appropriate.
- A number of active uses are proposed at ground floor along the main routes of Hampstead Road, Robert Street and Albany Street which are identified as suitable areas for these uses.
- Walking and cycling links will be improved and enhanced, in particular improved pedestrian access from Albany Street to Cumberland Market will be provided with the proposals for the Victory site. There will also be a new access provided to the Cartmel block through the new garden area at the Newlands plot. This block will otherwise become inaccessible during the construction of the realigned Hampstead Road.

In addition the design proposals set out in this document will:

- Create a lively place that will encourage activity and support a sense of community;
- Be distinctive and help to achieve a sense of place; and
- Be attractive and useable through both the building and landscape design.

The proposals have evolved through a comprehensive series of pre-application meetings with Camden officers. Further detail is set out in section 6 of this document.

Delivering good quality housing (London Housing Design Guide compliance)

The proposals have been designed to meet or exceed the quality standards set through the London Housing Design Guide in order to ensure that long lasting and successful

housing is delivered. In particular the following key criteria have been met:

- 100% of the units are designed to be Lifetime Homes;
- 100% of the units meet or exceed the minimum space standards set;
- 100% of the units are at least dual aspect and at Varndell Street there are some triple aspect units;
- 100% of the units achieve the minimum floor to ceiling height of 2.5m, in many cases achieving better standards than this such as at Robert Street where living spaces have been designed to have a floor to ceiling height of 3.2m in principal rooms; and
- 100% of the units meet or exceed the private amenity space standards set out for different unit sizes with many of the larger family units having two separate amenity spaces.

The above highlights the proposed high quality of the scheme and demonstrates compliance with the London Housing Design Guide.

Taller buildings

The London Plan states that taller buildings should only be introduced where the scale, mass or bulk of a tall or large building would not affect character. Taller buildings should also relate well to the form, proportion, composition, scale and character of surrounding buildings, urban grain and public realm. They should improve legibility of an area and enhance the skyline image of London. They should incorporate the highest standards of architecture and materials and they should have no adverse impact on local or strategic views. Policy 7.7 of the London Plan sets out that tall and large buildings should be limited to the Central Activity Zone, Opportunity Areas, areas of intensification or town centres that have good access to public transport.

The EAP sets general building heights that may be appropriate for new buildings within the area; the height set within this document for the Newlands plot is for a building of around fifteen to eighteen metres. The proposals are for a building that is around 38 metres high which is taller than the parameters set within the EAP.

The Newlands plot proposal is for a building of eleven storeys equating to 38 metres total height (see figure x).

The position and location of this building is justified by the following key points:

- The site is within the Euston Opportunity Area which is highlighted in the London Plan as a suitable place for taller buildings.
- The buildings conform with the principles of making efficient use of available land for housing as set out in the London Plan.
- In the context of HS2 going ahead the location of this building marks an important location within the changing context; it will be opposite the new Euston station entrance and along a key route that will become more significant with these changes.
- The building marks a key junction between Hampstead Road and Varndell Street where the proposed plans for HS2 involve strengthening the pedestrian and cycling links across the railway lines in alignment with the end of Varndell Street.
- The building sits facing Hampstead Road where the EAP sets building heights of around 30metres on the other side of the road. This means that the proposals will balance the massing of blocks along this key route and add a sense of scale and enclosure to this route.
- In the changing context this building will define the north eastern extent of the estate, marking a key point in the townscape.
- The building is set a good distance from the existing context and relates well to the form, proportion and composition of the surrounding buildings.
- The building is not within a Conservation Area or visible from nearby Conservation Areas or within the curtilage of a listed building.

In addition the proposals include a number of features that will ensure that the proposals have a positive impact on the urban grain of the estate at street level including (please see section 6 of this document for detailed design proposals):

- The provision of commercial space at the ground floor that will help to provide activity to the streets and spaces around the building.
- The landscape proposals have been designed to be public in nature and to provide an alternative public route whilst the realignment and raising of Hampstead Road is under construction meaning that the proposals contribute to improving the permeability of the estate and wider area. This public route would remain in place once construction is finished.
- The building is of a high quality design, using good quality materials.
- The building offers substantive community benefit through the delivery of a large number of affordable homes.

## Views

The Newlands plot proposals fall within Viewing Corridor 2B.1 (Parliament Hill to Palace of Westminster) and is close to 4A.1 (Primrose Hill to St Paul's). An analysis of Viewing Corridor 2B.1 has been carried out, and the lowest point of intersection with the site has been determined as being +61.500 above Ordnance Datum. This level is indicated on the submission drawings, and the height of the proposals has been set at this level and as such will have no impact on this viewing corridor in accordance with policy.

## 9.4 Open space

The proposals involve development on three grassed areas of open land within the estate boundary. These spaces are not designated open spaces or shown on the Council's Core Strategy Proposals Map.

The spaces vary in quality but generally are low quality, poorly used spaces. They consist of areas of grass with few facilities and poor levels of accessibility. A full qualitative assessment of these existing spaces has been undertaken in section x of this document. Whilst these spaces are currently low quality it is recognised that they present a level of visual amenity for residents and an opportunity for new and improved open space on the estate. For this reason efforts have been made to minimise the building footprints on these sites. The footprint of these buildings totals 1,081sq.m and is broken down by plot as follows:

- Newlands Plot – 392sq.m
- Former One Stop Shop – 381sq.m
- Varndell Street – 308sq.m

The Euston Area Plan sets out the approach to protecting and enhancing open spaces within the Regent's Park Estate under Strategic Principle EAP5. This principle states that any proposals for infill development on the identified sites should take a coordinated approach towards the landscape and open space provision by looking at the public realm, spaces and landscaping both within the sites and in the surrounding area. This approach has been adopted by the project team and used to develop the landscape proposals in the following way:

- **Reviewing underused areas that are close to or adjacent to the development plots that can be converted into open space.** A number of spaces have been found and used to create new open space as part of the landscape proposals. By undertaking this approach new open space has been provided on the estate equating to 1,033sq.m. This only just falls short (47.75sq.m) of the space that is lost through the building footprints. These areas are set out in section x of this document under the open space mitigation strategy.

- **Enhancing the quality of the existing open spaces.**

The landscape design for the affected plots will improve the quality of these spaces making them more accessible and able to serve a multi-functional purpose for a wider section of the community. The qualitative assessment in section x further sets out how the quality has been improved on these three sites.

- **Improving public realm and other spaces on the estate as part of a wider landscape strategy.** A number of additional sites have been identified across the estate and proposals for improving these spaces are included as part of this application. This will help provide a better network of accessible, useable spaces across the estate that are fit for purpose and have been designed in consultation with the local community.

Policy 7.18 of the London Plan sets out the approach to protecting open space and addressing deficiencies. The policy outlines that the loss of open spaces should be resisted unless equivalent or better quality provision can be made. Policy CS15 of LBC's Core Strategy sets out the approach to the protection of parks and open space within the Borough. CS15 states that designated open spaces and suitable land (over 400sq.m) on large estates should be protected from development. The supporting text for this policy describes that the reorganisation of uses on estates is permitted in conjunction with the re-provision of land for open space use. The strategy taken towards new open space provision and the qualitative improvements proposed mean that the proposals are in accordance with these policies.

## 9.5 Landscape, arboriculture and ecology

The landscape strategy aims to bring together public space and accessibility requirements within the site's ecological potential and existing green spaces.

A number of new public spaces are proposed including a new public square at Robert Street that will provide an improved pedestrian link with Cumberland Market. At Dick Collins Hall the massing and positioning of the buildings allows for a widened and improved public realm improving the setting of the adjacent Conservation Area and listed buildings. At Newlands plot a new public space is proposed that will provide improved landscaping and pedestrian routes. At St Bede's and the Cape of Good Hope improvements to the spaces around the existing hall and the new buildings will create a much improved public environment. In addition the mitigation sites provide a network of improved public spaces around the estate

A number of communal gardens for residents will be provided, at Rydal Water a communal space will be created for use by residents of the existing block and also the new buildings. At Varndell Street the existing communal garden space will be improved and made much more useable, access arrangements will be improved for residents as the space is currently fenced with no access. At Dick Collins Hall the courtyard space will be re-landscaped and a terrace space which is currently largely inaccessible for existing residents will also be treated with planting. At the Victory a communal garden incorporating secure cycle storage is provided for the use of new residents to the block.

## Play

The estate has a good network of existing play areas and spaces, including four Multi Use Games Areas (MUGAs) and a number of equipped play areas. Cumberland Market is centrally located and provides neighbourhood playable space suitable for all ages. Cumberland Market is within 400m of all development sites and therefore satisfies the requirements for children aged five to eleven and twelve plus.



The strategy for play for the new development set out in section x has therefore been to ensure that the requirements for doorstep play have been met to provide opportunities for younger children to play close to their homes. Cumberland Market satisfies the requirement for doorstep play for two of the nearby plots (Dick Collins Hall and The Victory) as they are within 100m of this area. The proposals will deliver 1,040sq.m of new doorstep play space for younger children. The total play space requirement, based on the GLA Playspace SPG would be 1135sq.m this falls slightly short of the GLA requirement but exceeds the Camden standard which would require 567.5sq.m of doorstep play. Given the large amount of existing play areas and the fact that proposed units all have external amenity spaces this is deemed to be acceptable.

### Tree strategy

The estate contains a number of existing mature trees that are spread throughout the estate that are in good health and contribute towards the character of the area. An Arboricultural Impact Assessment has been undertaken which surveyed the existing site to identify the number, species, quality and condition of the trees; this identified a total of 53 trees and six groups within or adjacent to the plots.

The development has been carefully designed to minimise tree loss and to retain all the category A trees of best quality on the estate. This includes the mature street trees that are an important part of the character of Albany Street. This strategy is set out in section x.

Construction of the proposals will require the loss of 30 trees and three groups in the following categories:

- Category A – 0 trees lost
- Category B – 22 trees lost
- Category C – 10 trees lost
- Category U – 1 tree lost

In order to mitigate against the loss of these trees it is proposed that 40 new trees are planted as part of the landscape proposals. This is a sufficient level of new planting

to offset the proposed losses and also enhance the street scene.

### Green / brown roofs

All flat roofs are proposed to be green roofs of a semi-intensive or extensive design. Full details of the strategy are outlined earlier in this report

### Ecology

A preliminary Ecological desk study and extended Phase 1 habitat survey were undertaken of the plots to establish their existing ecological value. The survey results indicated that the site area is not subject to any statutory nature conservation designations and that the proposals are unlikely to have an impact on designated sites or priority habitats.

The extended Phase 1 Habitat Survey states that plots were found to support habitats of low ecological value with some sites having habitat that has the potential to support breeding birds and hedgehogs. The Victory pub was identified as having an invasive species which should be eradicated following best practice guidance before demolition.

A number of the existing buildings on the estate were considered to have the potential to support roosting bats, following the Phase 1 Habitat Survey an additional external inspection for bats was undertaken. During this survey six buildings were inspected and two of the buildings were identified as having low potential to support summer / transitional bat roosts (The Victory and St Bede's Hall). The remainder of the buildings were identified as having a negligible potential to support roosting bats. All bats are protected by European and national legislation and planning policy, and as such further surveys of the buildings with low potential was recommended. An additional Dusk Emergence and Dawn Return to Roost Survey was undertaken of these two buildings. No bats were seen to emerge from, or return to, roosts during the survey, and very low levels of incidental bat activity was recorded. It was not possible to arrange an internal inspection at the Victory pub and it is therefore recommended that this is carried out prior to any demolition works to the buildings.

## 9.6 Drainage and flooding (SUDs)

A Flood Risk Assessment has been undertaken to identify any key risks and how they would be managed. The report confirms that the proposals are in accordance with policy in the following respects:

- The site is located in an area of low risk of flooding (Flood Zone 1).
- The proposals will not increase flood risk from groundwater on Site or the surroundings.
- The Site is at low risk from flooding from sewer failure and overland flows.
- The surface water runoff from the proposed development will be attenuated to the limiting discharge flow rate for rainfall events up to the 1 in 100 year +30%. The limiting discharge flow rate is defined as the highest flow rate from the following options:
  - The 50% of pre-development peak flow rates for brownfield plots; OR
  - The mean annual flow rate  $Q_{bar}$  for greenfield plots; OR
  - Where the limiting discharge flow rate would require a flow rate of less than 5 l/s at a discharge point, a flow rate of 5 l/s will be used where required to reduce the risk of blockage.

## 9.7 Energy and sustainability

The energy hierarchy has been used to establish a sensible and efficient approach towards the provision of energy and heating for the scheme in line with London Plan and Camden policies. The details of the strategy are contained within supporting document SD8 Energy and Sustainability strategy and the main principles are summarised below.

A fabric first approach has been taken to the new buildings with a highly efficient building envelope being designed to near Passivhaus standards to reduce energy demand from the new buildings.

In accordance with the hierarchy, the opportunities to connect into a decentralised energy network have been explored. A number of the key internal roads have been identified for major utilities diversions as part of the HS2 construction works. The diversions and already congested nature of the surrounding streets make it impractical to fit the further infrastructure into these streets. Two of the proposed buildings are deemed to be of a suitable size and location to make communal heating systems an efficient and logical solution. This is at Newlands Plot and Former One Stop Shop plot where these buildings have a sufficient number of units and are also well located to have the potential to connect into a future heat network at Euston Station.

It is therefore proposed that the remaining buildings are served by highly efficient individual boilers, in combination with roof level PV panels to achieve the 25% on-site reduction in carbon emissions required to meet Code Level 4. In order to achieve the 35% carbon reduction (over Part L 2013) required to meet London Plan Policy it is proposed that a payment is made through the Camden Carbon Offset Fund to help contribute towards improving the thermal efficiency of the fabric of existing buildings on the estate. This will not only provide the opportunity to offset carbon but will present a meaningful and tangible benefit to existing residents of improved thermal efficiency to their homes and increased fuel security.

All homes have been designed to achieve Code for Sustainable Homes (CfSH) Level 4, although the requirement to comply with the CfSH has been withdrawn. A pre-assessment has been submitted with this application (SD8 Energy and Sustainability Assessment) to demonstrate compliance as until more guidance is provided this will address any policy requirements.

## 9.8 Transport

London Plan Policy 6.13 requires an appropriate balance between promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use. The policy advocates the promotion of car free developments in locations where high public transport accessibility exists.

DP16, DP17, DP18 and DP19 of Development Policies seek to ensure that development is properly integrated and supported by sustainable modes of transport with the minimum necessary amount of car parking and at least the minimum amount of required cycle parking.

The anticipated additional demands generated by the proposed development (and other cumulative demand) have been identified within the accompanying transport assessment (SD2 Transport Assessment).

The main access roads within the application area are Robert Street and Varndell street and there is a good pedestrian network through the core of the estate. The estate is well located in terms of public transport accessibility and all areas of the estate have a Public Transport Accessibility Level (PTAL) of 6b, which is categorised as 'excellent'.

### Car free development

Policies CS11 and DP18 set out LBC's approach to car parking and encouraging more sustainable forms of transport.

In accordance with London Plan Policy 6.13 and Camden Policy DP18 the proposed development will be car free, with no additional car parking being provided. Overall there will be a reduction in the provision of estate parking permit spaces across the estate. This is due to some areas of parking being used as development sites and these spaces not being reprovided as part of the proposals.

As a number of the proposed residential units will be occupied by residents who already live within the estate and lease an estate parking space, it is proposed that those who currently lease a parking space will be able to continue to do so, although most likely in a different location. Residents of new homes will not be able to apply for resident's parking permit for on-street parking.

### Wheelchair accessible parking

Pre-application discussions with LBC Highways officers have established that disabled parking bays do not need to be provided within the site boundary, rather that people with disabilities can apply for a 'Blue Badge' that allows them to park in on-street parking spaces without a permit. The proposals include the provision of two disabled parking spaces within the site boundary on estate land. These spaces are to be provided to replace two wheelchair accessible parking bays that will be lost from estate land around the red blocks. These spaces are located close to the wheelchair accessible homes that they will serve.

### Cycle parking

The London Plan (2015) sets revised targets for cycle parking for residential development. New development is expected to achieve the following cycle parking standards:

- 1 space per studio and one –bedroomed units
- 2 spaces for all other dwellings
- 1 space per 40 units for visitors

LBC also have a cycle parking standard and guidance on requirements for cycle parking stands set out in Policy DP18 and CPG7 Transport. The LBC cycle standards are for one space per unit and one space per 10 units for visitors.

The proposals deliver the following mix of units, requirement for cycle parking and cycle parking spaces:

Plot name	No. of one bedroom dwellings	No. of other units (2+ bedrooms)	London Plan requirement for cycle spaces	LBC requirement for cycle spaces	No. of spaces delivered
Robert Street Car Park	1	12	25	13	26
Former One Stop Shop	15	9	33	24	27
Varndell Street	0	8	16	8	16
Newlands Plot	9	23	55	32	41
Cape of Good Hope	5	10	25	15	23
St Bede's Mews	1	2	5	3	5
Dick Collins Hall	2	9	20	11	22
The Victory	2	8	18	10	15
Visitor spaces required			2	11	
<b>TOTAL</b>	<b>35</b>	<b>81</b>	<b>199</b>	<b>127</b>	<b>175</b>

The table below demonstrates that the proposals are exceeding the standards set by Camden by a significant amount. The proposals fall slightly short of the new London Plan standard, but are felt to represent a balance between the requirement for cycle parking and ensuring active ground floors on larger blocks.



## 9.9 Impact on amenity of occupiers and neighbours

### Daylight / sunlight

Policy DP26 seeks to manage the impact of development on amenity, to ensure that the quality of life of occupiers and neighbours is protected. This includes considering a range of factors including overshadowing, sunlight and daylight. A technical analysis of the development and its effects on surrounding residential properties was carried out to determine the daylight and sunlight amenity to the surrounding properties and levels achieved in the proposed residential units.

A three dimensional computer model of the Site and relevant neighbouring properties and open spaces was used to measure the light received by neighbouring properties and open spaces as existing and proposed. The full assessment is contained in the SD9 Daylight and Sunlight Assessment.

This assessment concludes that the effect of the construction of the proposed scheme upon the surrounding residential windows is considered to be acceptable and in accordance with BRE guidance.

With regard to the new residential units these all meet or achieve better lighting levels than the minimum levels recommended by BRE & British Standards.

### Overlooking, privacy and outlook

The buildings have been designed in accordance with the guidelines set out in CPG6 Amenity, in particular in relation to ensuring a minimum of 18m between the windows of habitable rooms of units that directly face each other to avoid overlooking and a negative impact on residents privacy. This guideline has been followed except for the situations below that respond to specific local considerations where appropriate mitigation has been proposed:

**Former One Stop Shop** - the proposals for this plot are 17.5m away from the existing Rydal Water block, this is almost meeting the guideline distance and as such the proposals are not felt to have a negative impact on the privacy of existing residents. Rydal Water units are also dual aspect and as such only a small number of windows are affected by the proposals for each unit. This building has also had to move further back from the pavement edge in order to accommodate the realignment of Hampstead Road associated with the HS2 works.

**Dick Collins Hall** – the proposals east facade are 15.3m from the Peabody estate. This is below the guideline because it reflects the existing width of the street and as such this distance is deemed to be acceptable in this location. The short western elevation of the proposed block is 10m from the east elevation of Rothay and is a much more modest block that only sits opposite a short length of this elevation. The windows in this facade are not the principle windows to these rooms and if required could be obscured to prevent overlooking.

**The Victory** – the proposals north elevation is 13.5m from Rothay because this reflects the existing width of the street in this location and is not the location of principal windows. In order to overcome any overlooking issues a screening system is designed into the window of this facade. This prevents any direct overlooking between habitable rooms and is thus deemed acceptable. The system is described in further detail in section x.

**St Bede's** – the proposals western elevation is 12-13m from Troutbeck's east elevation in order to align with the existing built frontage of St Bede's Hall. The windows on the closest elevation of Troutbeck are kitchens, bathrooms, hallways and secondary bedrooms. The units within Troutbeck consist of duplex dual aspect properties with their principal living spaces on the Albany Street facade. The privacy of these units is already impacted upon due to the presence of deck access walkways and as such the proposals are not felt to have a negative impact on privacy. The eastern elevation does not directly overlook properties at Clarence Gardens but does have an oblique view that is under 18m away, a privacy screen has been incorporated into the balcony design to mitigate against this.

**Robert Street** – The Robert Street proposals are 17.5m from the southern facade of Mosedale however this is primarily only at ground level. The western elevation is 9.5m from Patterdale. The existing windows in Patterdale are all non-habitable rooms or hallways and as such not affected in privacy terms.

**Varndell Street** – The northern elevation of Varndell Street is 15.6m from Mackworth House, there is very minimal overlooking in this location and the proposals are not deemed to have a significant impact on privacy.

In addition care has been taken to ensure that the proposals do not have a negative impact on the outlook and visual amenity of existing homes. All proposals have been designed to ensure that residents have a pleasant outlook. The majority of the plots will involve provision of new amenity space that existing and new residents will look out onto and the majority of existing homes on the estate are also dual aspect meaning only one side of their property is impacted by the proposals.

## 9.10 Other environmental considerations

### Air quality

The site lies within an Air Quality Management Area (AQMA) meaning that there are objectives set that do not permit the raising of Nitrogen Dioxide and PM10 levels above a certain level. An Air Quality Assessment has been undertaken to identify the potential for the proposed development to have a significant effect on local air quality and to ensure it meets the objectives set within the AQMA.

The conclusions of the Air Quality Assessment state that the emissions relating to the proposed buildings and their operation are below the relevant benchmarks for NO2 and PM10. The impacts of local traffic on the air quality for residents living in the proposed development have been shown to be acceptable with respect to the PM10, PM2.5 and 1-hour mean nitrogen dioxide objectives. However, due to high background levels in the study area, annual mean nitrogen dioxide concentrations are predicted to exceed the annual mean objective across the site. The overall operational air quality impacts of the development are judged to be moderate.

The building emissions associated with the proposed development are below the relevant benchmark, however the transport emissions for the proposed development are above the benchmark. Appropriate mitigation measures are needed in order to ensure that the development meets the requirements of 'Air Quality Neutral' as defined in the GLA's (SPG) on Sustainable Design and Construction.

Mitigation measures have been applied to the worst-affected residential units which are those that have a front façade that faces on to Hampstead Road or Albany Street.

The cumulative impacts of HS2 construction upon air quality has also been assessed and it is considered unlikely that there will be any significant cumulative impacts associated with the proposed development and the HS2 project.

### Noise and vibration

A Noise and Vibration Assessment has been carried out to assess the extent to which and noise and vibration will affect the living environment of the proposed development. The principal source of noise which will affect the proposals is road traffic noise from the surrounding local road network.

Noise - The assessment demonstrates that the appropriate internal noise levels can be achieved for those rooms identified as being the worst affected and also demonstrates that the appropriate standards can be achieved for the rest of the development.

The assessment has also considered the impact of HS2 during its construction and operational phases on the proposals.

## 9.11 CIL, Shadow Section 106 and other contributions

London Plan Policy 8.2 requires LPA to set clear frameworks for the negotiation on planning obligations in DPDs.

Core Strategy policy CS19 confirms "The Council will work with Camden's Local Strategic Partnership and its other partners to deliver the vision, objectives and policies of this Core Strategy. We will:

- work with relevant providers to ensure that necessary infrastructure is secured to support Camden's growth and provide the facilities needed for the borough's communities.
- use planning obligations, and other suitable mechanisms, where appropriate, to:
  - support sustainable development,
  - secure any necessary and related infrastructure, facilities and services to meet needs generated by development, and
  - mitigate the impact of development ..."

Camden's draft CIL charging schedule has recently been adopted and guidance on planning obligations is currently contained in Camden Planning Guidance 8 (Planning Obligations) (CPG 8).

CPG8 provides an indication of what may be required when the Council considers that a development proposal needs a planning obligation to be secured through a legal agreement.

CPG8 identifies the main categories of development which may need to be addressed through the use of legal agreements including affordable housing, transport and other infrastructure, local climate change, works to streets and public spaces, community facilities and services, training and skills and community safety.

Off-site contributions will be discussed with the relevant departments during the application process.

## 9.12 Conclusions

This PDAS has been prepared in support of a planning application being made for full planning permission.

The proposed development as discussed in this statement is considered to be in accordance with planning policy and guidance at the national and local levels. When read as a whole, the proposed development accords with the development plan and provides a significant opportunity to contribute towards sustainable development in Camden.

Camden's Development Control Committee should therefore be minded to apply the presumption in favour of sustainable development in this instance and grant planning permission for the proposals. Amongst other considerations, this PDAS has outlined the following key planning and regeneration benefits. The proposals will:

- help to deliver the first stage of the future vision for the estate as set by the Euston Area Plan and act as a catalyst for longer term regeneration of the estate;
- provide permanent, affordable homes for residents who may lose their homes through the proposals for HS2, including opportunities for resident leaseholders;
- provide additional housing that will make a contribution towards Camden's housing stock and help to meet the housing targets;
- provide high quality and carefully considered architecture that will make a positive contribution to the area;
- provide a replacement community hall with improved facilities that will be used by a larger portion of the community; and
- provide a network of improved communal and public spaces.



