

Address:	140-146 Camden Street London NW1 9PF		2
Application Number:	2014/7908/P	Officer: Alex McDougall	
Ward:	Camden Town with Primrose Hill		
Date Received:	18/12/2014		
Proposal: Demolition of existing buildings, excavation of extension to existing single storey basement and erection of 1 - 8 storey building comprising 2,026sqm of commercial floorspace (flexible B1 use class) and 52 residential units (4 x studio, 19 x 1-bed, 18 x 2-bed and 11 x 3-bed C3 use class) with associated landscaping.			
Background Papers, Supporting Documents and Drawing Numbers:			
Existing & Demolition Drawings: D-CSC2-A100; D-CSC2-A101; D-CSC2-A102; D-CSC2-A103; D-CSC2-A104; D-CSC2-A105; D-CSC2-A201; D-CSC2-A202; D-CSC2-A203; D-CSC2-A204; D-CSC2-A205; D-CSC2-A206; D-CSC2-A207; D-CSC2-A208; D-CSC2-A209.			
Proposed Drawings: D-CSC3-A110-D; D-CSC3-A111-D; D-CSC3-A112-E; D-CSC3-A113-E; D-CSC3-A114-E; D-CSC3-A115-E; D-CSC3-A116-E; D-CSC3-A117-E; D-CSC3-A118-E; D-CSC3-A119-E; D-CSC3-A120-E; D-CSC3-A121-E; D-CSC3-A122-B; D-CSC3-A123-B; D-CSC3-A211-C; D-CSC3-A212-D; D-CSC3-A213-D; D-CSC3-A214-C; D-CSC3-A215-D; D-CSC3-A216-E; D-CSC3-311-D; D-CSC3-312-C; D-CSC3-313-C; D-CSC3-314-E and D-CSC3-315.			
Supporting Documents & Background Papers:			
<ul style="list-style-type: none"> • Affordable Housing Statement including Planning Obligations by Douglas Birt Consulting dated Feb 2015; • Air Quality Assessment Update by Air Quality Consultants dated 20/02/15; • Arboricultural Impact Assessment Ref: CHL/CMD/AIA/03a by Landmark Trees dated 08/12/14; • Basement Impact Assessment v6 by Price & Myers dated May 2015; • Basement Impact Assessment Addendum Letter and Supporting Documentation by Price & Myers dated 02/07/15; • Biodiversity and Ecological Assessment June by The Ecology Consultancy dated 04/06/14; • BREEAM Report v3 by Price and Myers dated 26/06/14; • Camden Street Materials Statement by Price & Myers undated; • Code of Sustainable Homes Pre-Assessment Report v2 by Price and Myers dated 16/12/14; • Construction Management Plan by Chassay + Last dated 09/12/14; • Daylight within the Proposed Development by Anstey Horne dated 08/12/14; • Daylight & Sunlight Report by Anstey Horne dated 09/12/14; • Daylight & Sunlight Report Addendum Letter by Anstey Horne dated 19/02/15; • Design & Access Statement (Including Waste Storage & Collection Strategy) by Chassay + Last dated Dec 2014; • Design & Access Statement Addendum by Chassay + Last dated July 2015; • Energy Strategy Report by Price and Myers dated 16/12/14; • Energy Strategy Report Addendum v2 by Price & Myers dated 23/02/15; • Existing Commercial Employment and Marketing Report by Goldstein Leigh dated 			

01/06/14;

- Existing Commercial Schedule of Accommodation by Chassey & Last dated 15/12/14;
- Independent Review of Assessment of Viability by BPS Chartered Surveyors dated 09/03/15;
- Independent Review of Assessment of Viability Addendum by BPS Chartered Surveyors dated 14/05/15;
- Landscape Design & Access Statement by Turkington Martin dated Dec 2014;
- Letter Replying to Viability Analysis from Allsop dated 11/05/15;
- Letter Replying to Review of Viability from Douglas Birt Consulting dated 01/07/15;
- Letters Replying to BIA review from Price & Myers dated 14/05/15 & 10/06/15;
- Lifetime Homes Statement and Wheelchair Accessibility Rev A by Chassay + Last dated Feb 2015;
- Marketing Letter from Roy Hayim dated 06/11/13;
- Noise Impact Assessment by Hann Tucker Associates dated 01/12/14;
- Planning Statement by CgMs Consulting dated Dec 2014;
- Revised Schedule of Accommodation by Chassy & Last dated 22/06/15;
- Revised 3D Visualisations by Chassay & Last undated;
- Statement of Community involvement by Bellenden dated Dec 2014;
- Secured by Design by Chassay + Last dated Dec 2014;
- Service Strategy by KUT Associates dated 15/07/13;
- Services Strategy for the Provision of Building Services v5 by KUT Associates dated 02/02/15;
- Structural Engineering Design Summary by Price & Myers dated May 2015;
- Townscape, Heritage and Visual Impact Assessment by City Designer dated 10/12/14;
- Townscape, Heritage and Visual Impact Assessment Addendum by City Designer dated 19/02/15;
- Townscape, Heritage and Visual Impact Assessment Addendum 2 by City Designer dated 03/07/15;
- Transport Statement by TTP Consulting dated Dec 2014;
- Viability Report relating to Employment Floorspace by Currell Commercial dated 17/12/14

RECOMMENDATION SUMMARY: Grant conditional permission subject to s106 legal agreement.

Applicant: Elebro Limited c/o Agent	Agent: Matthew Roe / Bethan Hawkins CGMS Consulting 7th Floor 140 London Wall London EC2Y 5DN
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ANALYSIS INFORMATION

Land Use Details:				
	Use Class	Description	Floorspace	
			GIA (sqm)	GEA* (sqm)

Existing	B1(a) B(8)	Offices Warehouses	1,604 973	1,689 1,025
Proposed	B1(flexible) C3	Offices Residential Dwellings <i>Of which Market</i> <i>Of which Affordable</i>	2,048 4,693 3,657 1,036	2,133 4,941 3,850 1,091
<i>*calculated based on multiplier of GIA (x1.053)</i>				

Residential Use Details:						
	Residential Type	No. of Bedrooms per Unit				
		0	1	2	3	4+
Existing	N/A	0	0	0	0	0
Proposed	C3(a) – Dwelling Houses	4	19	18	11	0
	<i>Of which Market</i>	2	15	15	8	0
	<i>Of which Intermediate</i>	2	2	2	0	0
	<i>Of which Social</i>	0	2	1	3	0

OFFICERS' REPORT

Reason for Referral to Committee: Major development involving the construction of more than 10 new dwellings or more than 1000 sq. mtrs of non-residential floorspace [Clause 3(I)].

1 SITE

- 1.1 The site has an area of 1,522sqm and is currently occupied by two 1950s commercial buildings which cover the entire site; a large single storey brick warehouse building and a double storey office building. The warehouse is currently vacant and the office building is partially occupied by the British Transport Police (BTP). The BTP have confirmed that they will shortly be relocating to the BTP headquarters at Shirley House on Camden Road. The warehouse building benefits from 2 vehicular accesses to Bonny Street.
- 1.2 The site is bound by Camden Street to the west, Bonny Street to the north, the Regents Canal to the south and two recently completed new/renovated buildings to the east. The site is located outside, but close to the boundary of, the Camden Town Centre. The towpath bounding the site to the south is designated as public open space.
- 1.3 There are two large buildings in the vicinity of the site. Shirley House, occupied by the British Transport Policy, is a 7 storey building to the south of the site on the north-eastern corner of Camden Street and Camden Road. Regent's Canalside, a recently completed residential development, is a 4 – 7 storey building to the east of the site on Camden Road (formerly known as Twyman House). The 4 storey element of Regent's Canalside directly adjoins the subject site. Morgan House, a recently renovated building, directly abuts the north east of the site.
- 1.4 The site is located within the Regent's Canal Conservation Area and adjoins the Jeffrey's Street Conservation Area to the north. The existing buildings on site are not noted as making a positive contribution to the Conservation Area.
- 1.5 Nearby listed buildings include the following:
- Nos. 2 - 8 Bonny Street – grade II listed terrace of three storeys and basements houses; c1840-45; 5m from site.
 - Camden Road bridge over the Grand Union Canal - grade II listed; c1816-20; 40m from site.
 - Camden Road Station – grade II listed; c 1870; 43m from site.
- 1.6 The site is located in an area with a Public Transport Accessibility Level (PTAL) of 6b (excellent). The site is located approximately 150m from Camden Road Overground station, 300m from Camden Town Underground station and several bus routes service Camden Street and Camden Road.

2 THE PROPOSAL

- 2.1 Please note that throughout this report 'storeys' refers to the number of storeys above street level. The canal is at basement level and as such the proposed building

will be an extra storey when viewed from the canal.

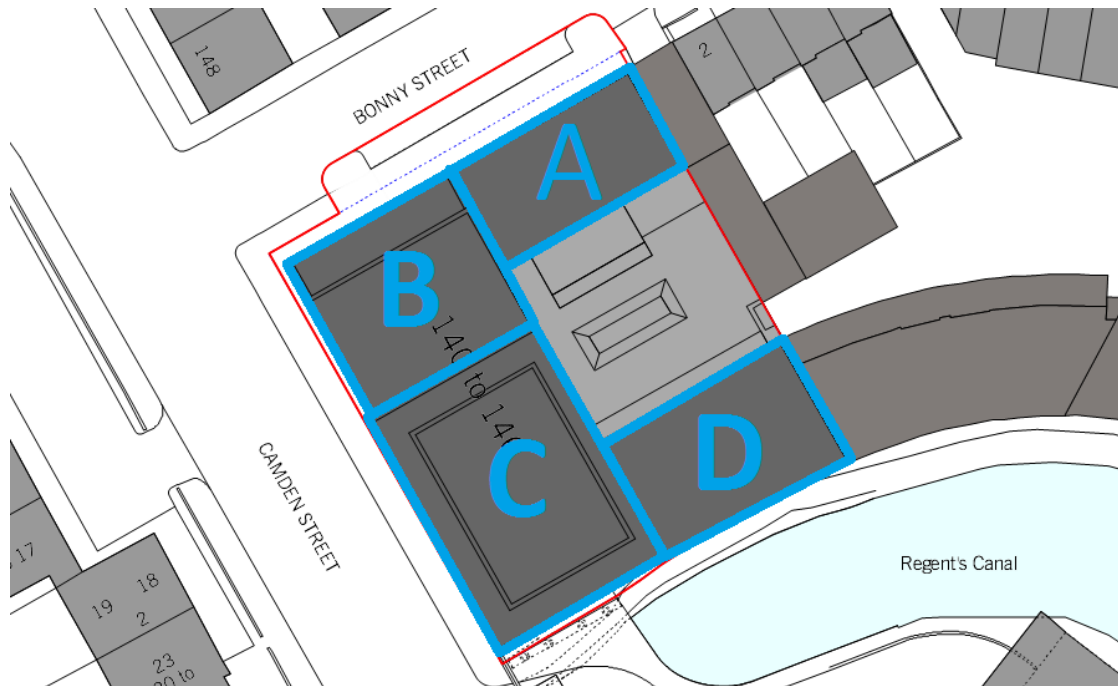


Figure 1. Plan showing block layout.

2.2 The proposal includes the following elements:

- Demolition of all existing buildings on site.
- Excavation of extension to existing single storey basement level. The basement will span the entire site and will house, along with parts of the ground floor, the commercial element of the proposal. The existing basement has dimensions 19.4m x 36.4m x 4.5m, the extension would have dimensions 22.9m x 36.4m x 4.5m, resulting in a total basement of dimensions 42.3m x 36.4m x 4.7m (a 63% increase).
- Erection of a 1 - 8 storey building comprising 2,026sqm of commercial floorspace and 52 residential units (4 x studio, 19 x 1-bed, 18 x 2-bed and 11 x 3-bed). Of the 52 dwellings, 12 would be affordable (social rent: 2 x 1 bed, 1 x 2 bed, 3 x 3 bed; intermediate: 2 x studio, 2 x 1 bed, 2 x 2 bed). The building would consist of 4 individual blocks in a horseshoe around a central single storey courtyard. The 4 blocks are described as follows:
 - Block A
 - Fronts Bonny Street (NE corner of site)
 - 4 storey building (12.6m above street level) plus basement, with the third floor would be setback 1.5m from the front facade
 - Brown brick with punched windows and balconies set back behind corbelled brick architraves
 - Basement and part ground: Commercial
 - Part ground and upper floors: Social Housing
 - Inaccessible green roof
 - Block B
 - Corner of Bonny Street and Camden Street (NW corner of site)
 - 4-5 storey building (17.9m above street level) plus basement
 - Yellow brick with punched windows and balconies to the west and contemporary oriel windows and Juliet balconies to the north
 - Basement and part ground: Commercial

- Part ground and upper floors: Intermediate and market housing
 - Green roof with private terraces
 - Block C
 - Corner of Camden Street and Regent's Canal (SW corner of site)
 - 8 storey building, 7 principal stories plus setback 8th floor 'roof' level (25.5m above street level) plus basement
 - Combination of yellow brick and perforated burnished brass screens, upper most floor set back from the main façade and largely glazed
 - Basement: Commercial
 - Ground and upper floors: Market housing
 - Inaccessible green roof with solar panels
 - Block D
 - Fronts Regent's Canal (SE corner of site)
 - 3 storey building (10.6m above street level) plus basement (14.1m above canal level)
 - Variegated green faience glazed brick to the 2 commercial floors overlooking the canal and dark brown brick to the upper levels
 - Basement and ground: Commercial
 - Upper floors: Market housing
 - Green roof with communal and private terrace and solar panels
 - Courtyard Structure
 - 1 storey building (avg. 4.5m above street level) plus basement
 - Large skylight at roof level
 - Basement and ground: Commercial
 - Green roof with communal and private terraces
- Transport – 1 x disabled parking space, and 1 x loading bay for service vehicles on Bonny Street, 128 cycle parking spaces in 4 cycle storage areas
- Waste – 3 storage areas
- Canal Works – Lighting, CCTV, and landscaping under adjacent bridge to south.

2.3 The application follows on from a previously withdrawn scheme (2014/4679/P). The scheme differs from the withdrawn proposal as follows:

- Fourth floor of Block A setback 1.5m from frontage
- Block C reduced from 9 to 8 storeys
- Block B reduced by 200mm in height overall, northern section reduced to 4 storeys
- Additional openings added to northern elevation of Block B
- Blocks C and D combined into one core with the main entrance off Camden Street
- Wheelchair accessible maisonette added to Block A
- Stairs removed from the internal courtyard
- Commercial space extended into Block D to provide canal frontage, elevation amended accordingly
- Colonnade fronting Camden Street removed

Revisions

2.4 During the course of assessment the Applicant submitted amended plans with the following changes in response to objections received from the public and advice

received from the Council's Planning Officers:

Block A

- Top floor northern elevation set back 1.5m behind the front facade to aid transition from Morgan House
- Parapet level dropped 400mm (2.3m higher than Nos. 2 – 8 Bonny street)
- South facing windows added to the wheel chair unit at first floor level
- Windows of ground floor wheelchair unit setback to provide defensible space
- Minor associated internal alterations

Block B

- Top floor northern elevation set back 3.8m behind front façade to respond to the character of, and limit impact on, Bonny Street. This area will be used as a private terrace
- Roof terraces reduced in size and set in from edges
- Parapet level dropped 450mm
- Additional windows on north elevation
- Entrance to the lobby moved away from adjoining ground floor residential unit
- Cycle parking for the shared ownership units moved closer to entrance
- Brick piers on Camden Street frontage brought down to ground level
- Perforated brickwork added to northern elevation to add visual interest.
- Proposed brickwork revised to Petersen water struck from the Kolumba range which will be in three tones of yellow, buff and beige to pick up and reference to the existing tones in the surrounding streets, to be laid in a horizontal format with recessed joints.
- Minor internal alterations

Block C

- Frame structure on 7th floor level removed
- Parapet lowered to overall height of Regent Canalside building
- Overall height (not including green roof) lowered to parapet level of Shirley House
- Commercial space re-arranged to allow more office space fronting onto the canal
- The entrance to the commercial space relocated to the corner of Bonny Street and Camden Street (in Block B)
- Perforated brickwork added to 7th floor parapet to add visual interest.
- Proposed brickwork revised as per Block B above.
- Minor internal alterations

Block D

- Parapet level lowered 160mm to match Regents Canalside
- Minor internal alterations

Other

- Communal terrace privacy screens increased in height to 1.8m high obscured

glass

- Lantern to rooftop courtyard lowered 1m
- External doors do not open over public footpath
- Access routes to cycle stores widened
- Cycle lifts provided
- Cycle stores revised in accordance with CPG 7 'Transport'
- Direct access added from the cycle stores onto Regent's Canal towpath
- Additional cycle parking, changing facilities and showers added to the commercial unit
- Due to the changes to Blocks A & B the unit mix was slightly altered during the assessment.

3 RELEVANT HISTORY

3.1 140 – 146 Camden Street (application site)

2014/4679/P - Demolition of existing buildings and erection of a part 3, 4, 5, & 9 storey building with basement to provide 1803sqm of commercial floorspace and 62 residential units with associated landscaping. Withdrawn 17/10/2014.

8903552 - Demolition of existing single storey building and erection of new five storey building. Refused 25/04/1990. Reasons for refusal, in summary, loss of light, excessive floorspace for area, contrary to office policy, impact on conservation area.

3.2 Regent's Canalside, formerly Twyman House, 31-39 Camden Road (adjoining site)

2011/2072/P - Redevelopment of the site with the erection of a part 4/7/8 storey building, including lower ground level, comprising 54 residential units (Use Class C3) (16 x one bed, 20 x two bed, 15 x three bed and 3 x four bed), 96sqm of either retail/professional & financial services/cafe (Use Classes A1/A2/A3) at part lower ground floor level fronting canal and 111sqm of retail/cafe use at part ground floor level fronting Camden Road, with associated hard and soft landscaping, cycle storage and 3 x disabled car parking bays off Bonny Street, following the conversion of Pulse House and demolition of Twyman House. Granted Subject to a Section 106 Legal Agreement 22/09/11. Completed in 2014.

3.3 Shirley House, 25-27 Camden Road (nearby site)

2014/3773/P - Change of use from office use (Class B1) at ground to 6th floor levels to residential use (Class C3) to provide 53 units (21 x 1, 32 x 2 bed), including use of 26 off-street car parking spaces for residential use at basement level. Grant Prior Approval 13/08/2014.

3.4 39-45 Kentish Town Road (nearby site)

2015/1937/P - Erection of a six-storey mixed use building comprising flexible employment/gym at ground floor level and 24 flats (1 x studio, 9 x 1 bed, 9 x 2 bed and 5 x 3 bed) together with associated works to create public realm improvements and landscaping. Decision pending. This site is to the west, beside the next bridge over the canal. The site is also in the Regent's Canal Conservation Area.

4 CONSULTATIONS

4.1 Developer Pre-Consultation

4.1.1 The Applicant has undertaken the following rounds of community consultation prior to and since submission of the application:

- Public Meeting 1 (10/04/13) 200 invitations hand delivered, 37 attendees including then Cllr Chris Naylor, 28 questionnaires returned
- Public Meeting 2 (01/07/13) 200 invitations hand delivered, 26 attendees, 17 questionnaires returned
- Public Meeting 3 (05/02/15) drop in session

4.1.2 Changes, plus those outlined in section 2.4 above, made as a result of the consultation process:

- Reduction in height & bulk
- Deletion of overhanging balconies
- Changes to façade materials
- Changes described in Section 2.4.14 below.

4.1.3 It should be noted that there is no statutory requirement for the applicant to undertake such public consultation prior to submitting an application.

4.2 Statutory Consultation

Transport for London

4.2.1 No objection subject to increase in cycle parking in accordance with the revised London Plan. Officers note: The application has been revised accordingly.

Thames Water

4.2.2 Following initial investigation, Thames Water has identified an inability of the existing wastewater infrastructure to accommodate the needs of this application. A condition will be included requiring that the development not commence until an acceptable drainage strategy has been submitted to and approved by, the local planning authority in consultation with Thames Water.

4.2.3 As there is known subsurface sewerage infrastructure under the site (river culvert) Thames Water has requested a condition to ensure that no impact piling take place until a piling method statement has been submitted to and approved in writing by the local planning authority in consultation with Thames Water.

Canal & River Trust

4.2.4 No objection, subject to appropriate conditions (risk assessment, landscaping, lighting/CCTV, and waterway wall survey) and £30,000.00 contribution towards more general canal improvements. Officer Note: The applicant decided to undertake the canal improvement works themselves in lieu of a financial contribution. The Canal & River Trust have agreed to this arrangement.

4.2.5 The Canal & River Trust consider the proposal an improvement to the setting of the canal and looks positively on proposed improvements to the canal.

Local Area Groups

4.2.6 The North Camden Town Neighbourhood Forum Steering Group raised objection to the proposal on the following grounds:

- **Height & Massing** - The Conservation Area statement refers to Shirley House as "*a building that harms the Conservation Area due to its height and massing*", Twyman House redevelopment was forced to be lower at DCC, other adjoining properties much lower, does not relate to scale of area
- **Consultation** – Overstated case in original consultation to appear responsive
- **Amenity** - Unacceptable loss of sunlight, daylight/sunlight report misleading in that winter light would be severely impacted, sense of enclosure on canal.
- **Principle** – Strain on local services, schools, GPs, etc.
- **Affordable Housing** - Social Housing insufficient in quantity and quality, no lift or amenity space.
- **Design** - Buildings not in keeping with local or nearby conservation areas, does not maintain sense of space, traditional style or materials.

4.2.7 The Regent's Canal Conservation Area Advisory Committee raised objection to the proposal on the following grounds:

- **Height** – Too high.
- **Density** – Too high.
- **Landscaping** - Insufficient open space, inadequate green roof depth for planting, towpath could be expanded, no details of planting strip between towpath and building.
- **Standard of Accommodation** - Poor quality of commercial space (lack of light).
- **Highways** – BTP parking bridge should be demolished.
- **Amenity** - Plant exhaust onto canal inappropriate, no details of lighting on canal.
- **Design** - Inappropriate materials (brass screens).

4.2.8 Following changes to the scheme discussed in Section 4.2.14 below, the Jeffrey Street Conservation Area Advisory Committee offered their support for the proposal.

Adjoining Occupiers

A site notice was displayed from 30/12/2014 to 20/01/2015 and the application was advertised in the Ham & High on 31/12/2014 for 3 weeks.

<i>Number of letters sent</i>	166
<i>Total number of responses received</i>	66
<i>Number in support</i>	7
<i>Number of objections</i>	59 (inc. petition signatures)

4.2.9 Petition objection received from 18 of the flats at 1 – 28 Camden Garden (opposite

Camden Street to west of site).

4.2.10 Petition objection received from 9 of the flats at 29 – 55 Camden Garden (opposite Camden Street to north-west of site).

4.2.11 Petition objection received from 15 of the flats at 1 - 92 Highstone Mansions, 84 Camden Road flats (east of site separated from site by Camden Road and Regents Canalside development).

4.2.12 A total of 18 unique objections were received from the following properties:

- Flats 23 & 31, 37 Camden Road
- 154 Camden Street
- 13 Camden Gardens
- 1 Prowse Place
- 1, 16, 21 Ivor Street
- 1, 1B, 2A, 3, 4A, 6, 7, 8A, 12, 15 Bonny Street

4.2.13 The objections and petitions collectively raised the following issues:

- **Time of Submission** - Around Christmas to minimise objections.
- **Mass** - Not related to area, scale of Bonny Street or Camden Street, Twyman House replacement was a mistake not to be used as precedent, top set back floor adds to dominance, sense of enclosure on canal.
- **Height** – Too high, Conservation Area statement says Shirley House harms conservation area. Twyman House replacement was reduced to not exceed Shirley House. Should be no taller than Regents Canalside. Two tall buildings are on Camden Road, Camden Street smaller residential (all low rise). Exceed height of adjoining listed buildings, other 3 storey buildings set back from street. All the buildings are creeping up, redevelopment of Shirley House would use proposal as precedent to go higher. Principle established at Hawley Wharf not followed. Montages in Heritage & Visual Impact assessment are misleading.
- **Density** - Too high, area too congested.
- **Design** - Out of context, Bonny Street enclosed with defined edges, lack of visual interest, sticks out, facades should match historical, not contextually appropriate, no hierarchy of levels.
- **Affordable Housing** - Limited amount of social housing should be on Camden Street, no lift or amenity space.
- **Obligations** - Pressure on social services, schools, health centres.
- **Transport** - Pressure on transport and traffic. Impact of servicing (including waste collection) on traffic, should be off-street.
- **Consultation** - Ignored concerns, overstated intentions to appear responsive.
- **Amenity** - Privacy (balconies), daylight & sunlight on Camden Street and Bonny Street, views, lifestyle, psychological, impact of servicing (including waste collection) on noise, daylight & sunlight report does not include enough nearby properties.
- **Commercial** - Loss of space.
- **Waste**- Pressure on waste collection.
- **Construction** – Noise/dust.

- **Use** - Commercial use not in keeping with residential character of area, health care or medical would be more appropriate, residential would be more appropriate along canal.
- **Security** – Less passive surveillance of Bonny Street during day. Does not adequately improve safety along tow path.
- **Other** - Pressure on royal mail.

4.2.14 During the course of assessment the applicant engaged with a group of local objectors to resolve their concerns relating to the impact of the height, bulk and detailed design of the proposal on the character and appearance of Bonny Street. The group of adjoining occupiers requested the following changes:

- Introduce 1.5m northern setback at third floor (roof) of Block A
- Introduce 3.8m northern setback at fourth floor (roof) of Block B
- Introduce 1.1m balustrade to top floor northern elevations of Blocks A & B
- Revise the colour of Blocks B & C to a lighter yellow colour

4.2.15 The Applicant agreed to all of these changes (except they proposed an alternative balustrade solution for Block B) and as such the following 7 consultees withdrew their objections and offered support for the scheme:

- No. 3 Ivor Street
- Nos. 1A, 5, 14 Bonny Street
- No. 12 Jeffrey's Place
- No. 63 Highstone Mansions, 84 Camden Road
- No. 195-199 Grays Inn Road (local architect)

5 **POLICIES**

5.1 **National Planning Policy Framework (2012)**

National Planning Practice Guidance

5.2 **The London Plan 2015 (consolidated with alterations since 2011)**

London Housing SPG
Sustainable Design and Construction SPG

5.3 **LDF Core Strategy and Development Policies (2010)**

CS1 Distribution of growth
CS3 Other highly accessible areas
CS5 Managing the impact of growth and development
CS6 Providing quality homes
CS8 Promoting a successful and inclusive Camden economy
CS11 Promoting sustainable and efficient travel
CS13 Tackling climate change through promoting higher environmental standards
CS14 Promoting high quality places and conserving our heritage
CS18 Dealing with our waste and encouraging recycling
CS19 Delivering and monitoring the Core Strategy

DP1 Mixed use development

DP2 Making full use of Camden's capacity for housing
DP3 Contributions to the supply of affordable housing
DP5 Homes of different sizes
DP6 Lifetime homes and wheelchair homes
DP13 Employment sites and premises
DP16 The transport implications of development
DP17 Walking, cycling and public transport
DP18 Parking standards and limiting the availability of car parking
DP20 Movement of goods and materials
DP22 Promoting sustainable design and construction
DP23 Water
DP24 Securing high quality design
DP25 Conserving Camden's heritage
DP26 Managing the impact of development on occupiers and neighbours
DP27 Basements and lightwells
DP28 Noise and vibration
DP29 Improving access
DP31 Provision of, and improvements to, open space and outdoor sport and recreation facilities
DP32 Air quality and Camden's Clear Zone

5.4 Supplementary Planning Policies (updated 2013)

5.4.1 Camden Planning Guidance (updated 2013)

- 1 – Design
- 2 – Housing
- 3 – Sustainability
- 4 – Basements
- 5 – Town Centres, Retail and Employment
- 6 – Amenity
- 7 – Transport
- 8 – Planning Obligations

5.4.2 Conservation Area Statements

Regent's Canal Conservation Area Appraisal and Management Strategy 2008
Jeffrey's Street Conservation Area Statement 2003

6 ASSESSMENT

Principle

Loss of Employment Space

6.1 The existing building contains 2,577sqm of commercial floor space; 1,604sqm of B1(a) office space, and 973sqm of B8 warehouse space. The proposal would result in 2,026sqm of flexible B1 floorspace (i.e. office, research & development, or industrial processes with no amenity impacts) a 21% reduction in commercial floorspace.

6.2 Policy CS8 (Promoting a Successful and Inclusive Camden Economy) seeks to

ensure that the borough retains a strong economy. It seeks to do this by, amongst other things, safeguarding existing employment sites that meet the needs of modern industry and employers and provide facilities for small and medium sized enterprises.

- 6.3 Policy DP13 provides more detailed information as to how these aims will be implemented. It states that the Council will retain land and buildings that are suitable for continued business use and resist a change to non-business use unless it can be demonstrated that the site or building is no longer suitable for its existing business use and that there is evidence that the possibility of retaining, reusing or redeveloping the site or building for similar or alternative business use has been fully explored over an appropriate period of time.
- 6.4 The existing warehouse space is considered to fall into Category 2 of Council's warehouse quality hierarchy (CPG5) as it is located within an otherwise predominantly residential area and its continued use could prejudice the amenity of residents. The existing warehouse also receives little natural light, which reduces its marketability. CPG5 states that Category 2 warehouses will be protected unless there is marketing evidence to show that the spaces are no longer suitable. The application includes evidence that the space has been marketed for a 2 year period, in accordance with the requirements in CPG5 (page 47), and not successfully let. As such loss of the warehouse element is considered to be acceptable.
- 6.5 Notwithstanding, the proposal includes flexible and updated light industrial floorspace, which is in high demand locally. The space has been designed in particular with creative industries in mind. The commercial unit has high floor to ceiling heights, heavy duty lifts, and large wide doors. The large floor plates would ensure the space could be easily adapted to suit the end user.
- 6.6 Furthermore, B1 office space provides for a higher density of workers than B8 warehouse space. As such the proposal would likely result in an increase in the number of jobs available on site.
- 6.7 As such the overall loss of employment floorspace is considered to be acceptable in principle due to the net improvement in the quality of the space and the number of jobs in the area.
- 6.8 Several objectors have questioned the appropriateness of ongoing commercial use of the site and have recommended medical uses instead. As stated above Council policy seeks to protect employment uses. Furthermore, the large size, open plan nature, and single main entrance mean that the space is not ideally suited to a doctor's surgery. Notwithstanding, it is unlikely that Council would oppose such a use on the site were it to be brought forward as part of a future planning application.

Demolition in Conservation Area

- 6.9 The proposal results in the demolition of 1950s warehouse/office buildings.
- 6.10 Paragraph 134 of the NPPF states that, "*where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use*". As stated previously the existing building is not identified as making a positive contribution to the Conservation Area. As such loss of

the building is considered to constitute no harm. The proposal will result in additional housing, a public benefit, helping the site achieve its optimum viable use.

6.11 As such the proposed demolition is considered to be acceptable in principle subject to an assessment of the design of the proposed buildings which is contained below.

Residential Density

6.12 Policy CS1 of the LDF Core Strategy seeks to focus growth in the most accessible parts of the borough. In order to make the most efficient use of land, higher density development is encouraged in those locations which are well served by public transport and there is an expectation that densities will be towards the higher end of the density ranges set out in the London Plan.

6.13 The density matrix (table 3.2) of the London Plan recommends, for a site located within an urban area with a high PTAL, a density of up to 260 units per hectare.

6.14 The proposal would provide 52 units and approximately 2,000sqm of commercial floorspace on a 0.1522 hectare site.

6.15 The London Housing SPG (p. 42) provides a formula for calculating densities of mixed use developments (the site area is discounted by the proportion of commercial/residential floor space). Based on the formula the proposal would result in an 'effective' density of approximately 500 units per hectare, which exceeds the London Plan density standard.

6.16 Notwithstanding, the proposed density is considered to be acceptable for the following reasons:

- The existing building on the site has 100% site coverage and as such sets a precedent for the same going forward.
- Due to the large size of the site and the relatively high separation from adjoining properties, the additional density, specifically in Block C, can be sited well away from adjoining properties.
- The site is in close proximity to the significant social, environmental and physical infrastructure and local amenities afforded by Camden Town and Central London.
- The proposed building will replace a building which makes a neutral contribution to the conservation area with one of a high quality of design.
- The proposal will provide a high standard of sustainability, above and beyond what is required, including expansive green roofs.
- The proposal will provide a high quality of residential accommodation, including private amenity space for all units, which is often difficult to achieve on urban sites.
- The proposal will provide the maximum viable level of affordable housing on site.
- The proposal will provide flexible light industrial and office floorspace in a highly accessible location.

Residential Mix

6.17 Camden Policy DP5 requires that all residential development provide an appropriate

mix of dwelling sizes. See Table 1 below for a summary of the proposal.

Unit Type	Studio	1 Bed	2 Bed	3 Bed	Total
Social Rent	0 (0%)	2 (33%)	1 (17%)	3 (50%)	6 (12%)
Shared Own	2 (33%)	2 (33%)	2 (33%)	0 (0%)	6 (12%)
Private	2 (5%)	15 (38%)	15 (38%)	8 (20%)	40 (77%)
Total	4 (8%)	19 (37%)	18 (35%)	11 (21%)	52

Table 1. Dwelling size and type matrix

- 6.18 With regard to market housing, DP5 seeks 40% of housing as 2-bedroom dwellings, and a higher percentage of large (3 bedrooms or more) versus 1-bed units. While the proposal would ideally provide more large units, the area is not identified as having a specific shortage of larger dwellings, and the ideal proportion of 2 bed units is achieved.
- 6.19 With regard to intermediate affordable housing, DP5 seeks 10% of housing as large dwellings, with a higher percentage of 2 versus 1 bed units. The proposal provides no large units, and provides more studio/1 bed than 2 bed units. However, given the high cost of property in the area, and the impact it will have on the true affordability of these units, the proportion of smaller units is considered to be acceptable. Council's Housing Commissioning and Partnerships Team consider the offer to be acceptable and Circle Housing have made an offer to buy the units on the basis of their size.
- 6.20 With regard to social rent housing, DP5 seeks 50% of housing as large dwellings, with a higher percentage of 2 versus 1 bed units. The provision of 3 x 3 bed units is welcomed and the overall mix is considered to be acceptable.
- 6.21 As such the proposal is considered to provide a development which contributes to meeting the Council's priority housing needs, and provides an appropriate a mix of large and small homes.

Affordable Housing

- 6.22 Council Policy DP3 states that Council expects all residential developments with a capacity for 10 or more additional dwellings to make a contribution to the supply of affordable housing.
- 6.23 The proposed development would provide 52 units (4,941sqm GEA of residential floorspace) on site which triggers a requirement for 50% affordable housing on site (26 units/2471sqm). The proposal includes 6 social rented units (2 x 1 bed, 1 x 2 bed and 3 x 3 bed units) and 6 affordable 'shared-ownership' units (2 x studio, 2 x 1 bed and 2 x 2 bed units). The total affordable offer of 12 units (23%) and 1,091sqm GEA (22%) of floor space is equivalent to a shortfall of 14 units or 1,380sqm GEA respectively.
- 6.24 To account for this non-compliance the application is accompanied by a Viability Report which attempts to justify that the project would not be viable if any additional affordable housing was provided.
- 6.25 To test the validity of the report it was independently reviewed. Detailed discussion and negotiation has been undertaken between the Council's independent viability consultant and the application regarding the Existing Use Value (EUV) of the scheme and the methodology to use in the viability assessment. The independent assessor

has agreed to use of a cash flow model which recognises that rents and sales values will only be realised in the future. The independent assessor is satisfied that the proposal cannot provide any additional housing while remaining economically viable. See Appendix 3 for the independent reviewer's reports.

- 6.26 As the viability assessment demonstrates that the AH contribution falls below the policy target Council require a Deferred Affordable Housing Contribution (DAHC), triggering a viability re-appraisal post-commencement. The maximum DAHC is based on Council's formula for payment in lieu. The application has a shortfall of 1,380sqm and as such the maximum DAHC would be £3,657,000 (£2,650/sqm of shortfall in on-site target).
- 6.27 Circle Housing have put in an offer for all 12 of the affordable housing units and have accepted that they are all of appropriate size and specifications for their purposes.
- 6.28 As such, it is considered that the proposed contribution to the provision of affordable housing is acceptable, subject to a legal agreement requiring a DAHC review take place at practical completion.

Overall Principle

- 6.29 The proposal is considered to be acceptable in principle subject to the following material considerations:

- Residential Standard of Accommodation
- Design and Appearance
- Basement Impact Assessment
- Neighbouring Amenity
- Transport
- Sustainability & Energy Efficiency
- Trees, Biodiversity and Landscaping
- Planning Obligations

Residential Standard of Accommodation

Residential development standards

- 6.30 Camden's CPG2 and the London Plan state that new self-contained dwellings should satisfy minimum areas for overall floorspace. All of the proposed units satisfy the London Plan standards and all but 4 satisfy the CPG2 standard. The units that do not comply represent only a minor non-compliance with the overall space standards in CPG2. Given that several units are well in excess of the minimum requirements, that the unit meets the London Plan standard, on balance, the dwelling sizes are considered to be acceptable. Please refer to Appendix 2 for a summary of the units.
- 6.31 Camden Planning Guidance requires that first and double bedrooms achieve a minimum floor area of 11sqm and the London Plan requires these rooms to be at least 12sqm. The proposed bedrooms comfortably meet these standards.
- 6.32 The units in Blocks B, C, and D all benefit from lift access in keeping with the standard in the London Housing SPG. A lift is not proposed in Block A, the social housing block, as this adds to servicing costs and makes the units less attractive to

registered housing providers.

Light and outlook

- 6.33 All units will have a south, east or west outlook and 42% of the units would have a southern aspect, ensuring that all received at least some direct sunlight. 63% would have dual outlook ensuring additional daylight and cross ventilation.
- 6.34 The units in Block A have primarily northern outlook. As such the application has been submitted with a report outlining the light to be received by the proposed units. The report uses BS8206 and BRE Report 209 as standards which recommend the following minimum values of ADF in housing: 1% for bedrooms, 1.5% for living rooms and 2% for kitchens. All of the units except the kitchen/living/dining rooms on the ground and first floor units in Block A (2 units) would meet the minimum requirements. Given the constraints of the site it is considered that such a minor non-compliance is not reason to refuse the application.
- 6.35 With regard to outlook, all units are at or above ground level and have windows that face out from the development site, which is well separated from adjoining properties, and as such are considered to have sufficient uninterrupted views.

Air Quality and Noise

- 6.36 The site is located on Camden Street, a busy, urban street. The proposal includes living spaces and bedrooms with windows that face directly on to Camden Street.
- 6.37 There is concern regarding the effect of poor air quality, caused by Camden Street, on future occupiers. The applicant has provided an air quality report to respond to these concerns. The report predicts that the limits for nitrogen oxides will likely exceed acceptable levels at the first to fifth floor Camden Street flats. As such the applicant has proposed to include a mechanical ventilation system which will provide the units with cleaner air from the roof. Subject to details of flue location and filtration such a solution is considered to be sufficient to ensure occupants are not unacceptably exposed to traffic pollution.
- 6.38 There is concern regarding the effect of noise, caused by Camden Street, on future occupiers. The applicant has provided a noise survey and assessment to respond to these concerns. The noise survey found that the equivalent continuous sound level (L_{Aeq}) on the Camden Street frontage was 71dB during the day and 65dB at night (with 9 night time events over 82dB), which corresponds to Category C noise exposure as defined by PPG24 'Planning and Noise' Noise Exposure. Category C requires that conditions be imposed to ensure protection against noise. Council expects indoor noise levels to target the 'good' sound levels in BS 8233 of 30dB for living rooms and bedrooms (although it allows up to +3dB in the case of existing noisy areas). The report concludes that thermal double glazing would provide attenuation reducing the internal noise levels to 38dB daytime and 32dB night-time and as such not quite meeting the standard. However, the actual glazing for the project has not yet been specified. Triple glazing and/or secondary glazing could be included to further reduce the noise attenuation. As such the proposal is considered likely to be able to meet the relevant standard. A condition will be included requiring full details of acoustic treatment prior to construction.
- 6.39 The dust assessment in the draft Construction Management Plan (CMP) submitted

with the application is considered to be insufficient. As part of the s106 legal agreement the Applicant would be required to assess the level of construction dust risk and identify appropriate mitigations in accordance with the GLA's Control of Dust and Emissions SPG.

Amenity Space

- 6.40 The London Housing SPG recommends that every 1-2 person dwellings provide 5sqm of private outdoor space, with an extra 1sqm for each additional person. All but 2 units will have access to a 5+sqm private balcony, generally satisfying this standard. All but the social rent and intermediate units will have access to a communal roof top terrace. The lack of a roof top terrace for affordable units is considered to be acceptable as such facilities add to the service charge (making the units less attractive to registered housing providers) and the depth of the roof of Block A is not conducive to provision of a terrace. The balconies will mostly satisfy the relevant criteria in CPG2 in that they will be of an adequate depth, the majority will receive direct sunlight, and are located off of living spaces.
- 6.41 The site is also within walking distance of several pocket parks and the canal tow path that would provide further amenity to future occupants.
- 6.42 Overall the level of provision of amenity space is considered to be commensurate with the urban location.

Lifetime Homes

- 6.43 The Applicant has submitted a Lifetime Homes Assessment. It is considered that the proposed units adequately satisfy or are easily adaptable to satisfy all relevant criteria (the 2 parking related criteria are not relevant). Notwithstanding, a condition is recommended requiring that the relevant design features are implemented.

Wheelchair housing

- 6.44 As the proposal would result in 52 units the proposal is required to include at least 5 wheelchair adaptable units. The proposal includes 1 dedicated fitted wheelchair accessible maisonette as part of the social housing offer and 4 units in the other blocks that would be easily adaptable for wheelchair use, thereby satisfying the criteria.

Waste & Servicing

- 6.45 In respect of servicing, space for the storage of refuse and recycling for the residents is provided in dedicated areas adjacent to the various entrances.
- 6.46 The waste storage areas are in a convenient location for residents entering and exiting the site. The waste storage areas are also close enough to the front boundary to allow easy collection for waste vehicles waiting on Bonny Street or Camden Street.

Privacy

- 6.47 The development includes windows and amenity spaces in close proximity to the doors and windows of other units within the development. CPG6 states that there

should normally be a minimum distance of 18m between the windows of habitable rooms of different units that directly face each other in order to ensure privacy. Blocks A and Blocks D, the rear windows of which directly face one another, are separated by 18m and as such satisfy the privacy criteria. Although windows on the rear elevation of Blocks B and C are closer to the rear elevations of Blocks A and D, the 90 degree offset ensures that there will not be significant direct views between the units. Similarly the roof top terraces of Blocks B, C, and D are sufficiently removed or offset from opposite windows so as to ensure sufficient privacy.

- 6.48 With specific reference to the affordable housing block (Block A), the ground floor wheelchair unit is inherently compromised due to its location at street level. However, a combination of a setback window, railings and landscaping is considered to provide adequate privacy to the ground floor of this unit. In addition, the unit is a maisonette, allowing occupants a reprieve from any perceived privacy infringements. The rear windows, which back onto the communal terrace are either sufficiently raised above the terrace, or adequately screened, so as to protect the privacy of the occupants.
- 6.49 The courtyard terrace is at the same level as the rear windows of several of the units in the surrounding blocks. A landscape statement has been submitted outlining how the privacy of these units will be protected. However, there is still some doubt that there is sufficient screening to maintain privacy to these units. As such as part of the landscaping condition further details of such screening will be requested prior to construction.

Contamination

- 6.50 The site is identified as potentially contaminated land owing to its industrial history. The Basement Impact Assessment submitted with the application includes testing of soil samples which found elevated levels of some harmful substances. However, there will be no green open space at ground level which could potentially provide a pathway between ground contaminants and future occupants. On balance it is considered that the proposal is a medium contamination risk and a condition will be included requiring adequate further investigation be undertaken, and remediation if necessary, prior to commencement.

Design and Appearance

- 6.51 Achieving high quality design and appearance as well as considering street scene and the wider context including conservation areas, is a requirement of policies CS5, CS14, DP24 and DP25.
- 6.52 The main issues to consider from a design and conservation perspective are the impact the development would have on the setting of the Conservation Area (and adjoining listed buildings) having particular regard to the height, bulk and design of the redevelopment as a whole.

Site Coverage

- 6.53 The proposed 100% site coverage is considered to be acceptable as it is in keeping with the existing building and the historical use of the site.

Height & Bulk

- 6.54 The scale and height of each block relates directly to its individual urban context and would not be viewed as significant out of scale or height from any vantage point.
- 6.55 The heights of all blocks have been reduced during the course of the application. Of particular note, the parapet height of block C now matches the height of Regents Canalside and the overall height (not including the green roof) of block C is in keeping with the parapet of Shirley House. The parapet height of Block D now matches the adjoining canal block of Regents Canalside.
- 6.56 **Block A** would be four storeys in height; three storeys on the Bonny Street frontage, with the top floor set back 1.5m. This is not excessive for a residential street of this nature and variety. The top floor has been set back to reduce bulk when viewed from near views on Bonny Street and to address the direct abutment between the varied heights. The block would be only half a storey higher than the listed buildings adjacent to the site (Nos. 2-8 Bonny Street) and lower than the overall height of the terrace of 5 buildings at Nos. 12-14 Bonny Street. Moreover the listed buildings are separated by Morgan House which is a lower unlisted building.
- 6.57 **Block B** is at the corner of Bonny Street and steps up in height accordingly to address the busy Camden Street frontage. The corner with Bonny Street is 4 storeys, to respond to the context of that street, with the building stepping up to 5 storeys to step up to the adjoining proposed Block C. This is a typical and established feature of the urban environment. The same occurs at the eastern end of Bonny Street where No. 43 Camden Road (of similar height to block B) returns onto Bonny Street. In this regard the height is considered consistent with the termination of Bonny Street and increased scale of development along Camden Road. The scale mediates between existing developments along Camden Street and Shirley House in a manner which would enhance the overall streetscape along this part of the street.
- 6.58 **Block C** The parapet height of block C would match that of Regents Canalside and would be lower in height than Shirley House. The location of block C is considered to be comparable to Regents Canalside in that it is on the corner of the intersection of the canal and a road bridge. The blocks are close together and both forms are positioned on the bend of the canal adjoining a vehicular traffic bridge over the canal which serves a busy road network. In this regard it is reasonable to allow a similar scale (footprint and height of building) for this block. The top floor would be well set back from the principle facades (2.9m from north, west and south elevations) and as such would not be largely visible.
- 6.59 In fact due to the position and curve of the towpath on the northern bank views are limited to oblique and short range local views, particularly from the canal. In long range views the block would be most visible from the Kentish Town Road canal bridge and at the junction with Camden Road and Camden Street. In both views the building would be read as smaller than, or equal in height and scale alongside Shirley House and Regents Canalside respectively.
- 6.60 It should be noted that the canal is bound by many contrasting buildings from the period after the original 19th century development. The Regent's Canal Conservation Area Appraisal notes that these are part of the area's character and can make a positive contribution, as in the case of Grimshaw's housing and supermarket close to the site and the warehouse further west at Nos. 38 - 46 Jamestown. The canal is also a developing context, with recently completed taller buildings shown to be able to make a positive contribution to its character and

appearance. Those at Kings Place and No. 103 Camley Street are examples. There is also no planning policy which restricts the height on the subject site to a maximum height or states that the proposed development must be lower than Regent Canalside.

- 6.61 Concerns have been raised over the footprint of block B and C however these are commensurate with the scale of the blocks of Regents Canalside and would not feel out of scale along Camden Street. The canal frontage of Block C is narrower than that of Regents Canalside. The northern frontage of Block C has been suitably articulated to not appear over scaled.
- 6.62 **Block D** runs along with the canal and matches the height of the existing adjoining Regents Canalside block to complete this section of the canal. The adjoining building was granted permission under the same policy regime and is considered to be an appropriate benchmark for height at this location.

Design

- 6.63 The contemporary design of punched openings in brick façades is considered to be an acceptable contextual approach. The overall design has a contemporary high quality idiom. Each block varies to address their particular context.
- 6.64 **Block A** has a regular vertical rhythm which divides the block vertically into 3 elements. The elements relate to the width of the adjoining town houses along Bonny Street. Each vertical element is modulated to provide stepped/corbelled brickwork window/balcony openings. This gives a high level of detail and depth to the elevation, with the use of layering and shadowing effects which provides a level of interest consistent with the existing buildings on Bonny Street and the opportunity to introduce a high level of refinement to the façade in the most sensitive area of the site. It is considered that this would enhance the area compared to the existing building.
- 6.65 **Block B** is a more simply adorned façade which addresses the junction, the existing commercial use of the site and the proposed mixed use of the building. The building has a tall ground floor to provide high quality commercial accommodation and access; in combination with a regular pattern of windows facing Bonny Street to relate to the more domestic character and appearance of this street. Large corner windows address the junction whilst the rear flank façade (facing east) provides a blank façade to ensure the building appears as part of the terrace along Bonny Street and not a stand-alone building. The ground floor corner of Block B is splayed on the corner of Bonny Street and Camden Street and contains the primary commercial entrance. This is considered to be an appropriate way to mark the corner. There is no specific signage treatment currently proposed. Any signage would require a separate application.
- 6.66 **Block C** is the tallest building. The building is composed of an expressed brick grid proportioned to provide a clear base, middle and top within a refined vertical emphasis designed to reduce its perception of scale. The brick grid of Block C will be punctured with inset balconies and deep reveals which add depth and visual interest to the elevation. Fixed and sliding screens of perforated burnished brass will provide contrast with the lighter brick of the façade. The sliding screens on the principal elevation to Camden Street may be orientated over the windows or slid into the pockets in the brickwork by the occupants of the building. This variety in their use

will indicate the domestic nature of the building as will individual use of balconies. The upper floor would be largely glazed to provide a lightweight addition to the roof.

- 6.67 **Block D** relates to the scale and design of the recently built development along the canal at Regents Canalside. The scale would be identical and the green variegated faience tiles used at the lower levels of Block D are designed to reference the movement and reflective nature of the canal.
- 6.68 The ground floor treatment along Camden Street is primarily glazing between piers, considered to be in keeping with the increased activity on this street. The Bonny Street elevation is more residential in nature, in keeping with smaller scale of the street. The residential entrance for Blocks A & B are on Bonny Street, in keeping with the character of the street. The entrance for Block C & D are on the southern side of the Camden Street elevation, well separated from the commercial entrance.

Materials

- 6.69 The facades use a limited high quality palette of natural materials appropriate for the setting of the development.
- 6.70 Concern was raised by objectors relating to the use of brass in the façade of Block C. Burnished brass is a high quality contemporary material. It has a similar tonal range and patina to dark stock and red brick commonly found in the area. It weathers well with age to a dull brown consistent with dark stock brick buildings. The material would be set behind the brick grid in deep reveals creating depth and visual interest. The material would not be reflective but afford a rich matt finish consistent with the industrial landscape and history of the canal environs.
- 6.71 The use of brick for the main body of the facades would provide a high quality neutral response to the surrounding area whilst the coloured tiles within the window recess would provide interest and variety.
- 6.72 A condition is recommended requiring further details of the proposed materials to ensure the quality of finish, windows, glazing, balconies, balustrades, doors, and facing materials. A sample materials board will be required for Local Planning Authority inspection. A condition is also recommended requiring that no additional lights, meter boxes, flues, vents or pipes, telecommunications equipment, alarm boxes, television aerials or satellite dishes be attached to the building without permission.

Impact on Listed Buildings

- 6.73 As noted in the history section above there are 3 sets of listed structures in the vicinity of the site. The Camden Road bridge and Camden Road station are considered to be sufficiently setback from the proposal that their heritage significance and setting will not be harmed by the proposed building.
- 6.74 Nos. 2-8 Bonny Street are one building removed from proposed Block A. Block A has been designed to respond to these buildings by using brick, maintaining a similar parapet height, and being divided horizontally into equal bays of approximately equal width to the listed terraces. The top levels of Blocks A & B have been setback significantly so as not to dominate the scale of the listed buildings in views from within Bonny Street. Views of Block C will be minimal from Bonny Street and Block D will not be visible at all.

6.75 As such the proposal is considered to maintain the historic significance and setting of all nearby listed buildings.

Conclusion

6.76 For the reasons set out above the scheme is considered to preserve the setting of the nearby listed buildings and the character and appearance of the Regent Canal Conservation Area and the adjoining Jeffrey's Street Conservation Area. As such the proposal complies with Camden policies CS14, DP24 and DP25 as well as CPG1 and the NPPF.

Basement Impact Assessment

6.77 The existing site includes a part single storey basement to the southern side of the site (at canal level). The proposal includes extending the single storey basement to cover the entire site. The basement would extend to a maximum depth of approximately 4.5m below street level, and would be generally equal to the water level in the canal.

6.78 Policy DP27 and planning guidance CPG4 state that developers are required to demonstrate, with methodologies appropriate to the site, that basement schemes do not interfere unreasonably with underground water flows; maintain the structural stability of the land, existing building and neighbouring properties; and do not contribute to localised surface water flow or flooding.

6.79 The application is accompanied by a Basement Impact Assessment (BIA) which has been prepared in accordance with policy DP27 and planning guidance CPG4 – Basements and lightwells. The BIA has been prepared by suitability qualified engineers. The report goes through the screening exercise recommended in CPG4 in respect of groundwater flow, land stability and surface flooding and triggered the following requirements for further investigation:

Subterranean groundwater flow

- The proposal is directly over the Fleet River culvert, and directly adjoins the Regent's Canal.
- The proposal *may* extend below the water table.
- The lowest point of the proposal *may* be below the mean water level of a pond or springline.

Land stability

- London Clay is the shallowest strata at the site.
- Trees are in the vicinity of the site.
- The site is within 5m of a Camden Street, Bonny Street and Regent's Canal towpath.
- The proposal is directly over the Fleet River culvert, and directly adjoins the Regent's Canal.

Surface flow and flooding

- None.

- 6.80 The scoping stage of the report concluded that a site investigation report should be undertaken. The site investigation included a review of geological and hydrogeological maps, a review of historical OS maps and environmental searches, a walkover, various boreholes to depths of 6m, groundwater monitoring stand pipe for 2 weeks, and laboratory testing of soil samples for geotechnical purposes.
- 6.81 With regard to groundwater flows the BIA finds that while perched water was found during site investigate works, that it is unlikely the proposed extends below the water table and as such will not have a significant impact on ground water flows. It should be noted that the canal is a controlled waterway and as such is not prone to sudden changes in water levels.
- 6.82 With regard to surface water flow, there is no record that Camden Street or Bonny Street have been subject to localised surface water flooding. The proposal does not include any habitable space below ground level and as such no concern is raised with respect to safety during flood events (office workers would be awake and able to walk up to ground floor level). The BIA notes that the proposal does not include an increase in hard standing, and includes extensive green roof which will help to minimise surface water runoff, a pipe to direct any ponding water on Bonny Street to the canal, and systems to reduce runoff from the site to the sewerage system to an acceptable amount. Notwithstanding, conditions will be included requiring a full drainage strategy be submitted prior to development. As such the proposal is considered to have an acceptable impact with regard to surface water flow subject to conditions.
- 6.83 With regard to stability of adjoining properties the BIA finds that the potential for damage to all adjoining properties would be damage category 0 (negligible), except 1A Bonny Street to which the front wall of the building could be subject to damage up to category 3 (moderate). CPG4 states that specific mitigation measures are required when the proposal exceeds Category 2 classification. The Applicant's BIA outlines an underpinning solution, with monitoring, which will reduce the impact on this wall to within acceptable limits. The independent BIA review, discussed in the next point, is satisfied that this is a reasonable solution.
- 6.84 Camden Planning Guidance 4 recommends that BIA independent verification be undertaken if a BIA extends to the scoping stage. A BIA review was undertaken and initially raised several concerns. Subsequently, various additional and revised documents were provided by the applicants' engineers, Price & Myers, including a revised BIA with an additional borehole and revised drawings. This additional information resolved most of the areas of previous concern. The remaining details can be secured as part of the Basement Construction Plan to be secured by legal agreement.
- 6.85 Given the scale of the proposed basement and the proximity to adjoining properties and public land, it is considered that a condition should be included requiring that a qualified engineer supervise the excavation and that a Basement Construction Plan should be secured via legal agreement.
- 6.86 Based on the information provided the BIA is considered to adequately demonstrate that the proposal would, subject to condition, maintain the structural stability of neighbouring properties; avoid adversely affecting drainage and run-off or causing other damage to the water environment; and avoid cumulative impact upon structural stability or water environment in the local area.

6.87 Thames Water has asked to be consulted on the piling strategy. As such a condition is included to this effect.

Neighbour Amenity

6.88 Consideration of amenity impacts on neighbours is a requirement of policy CS5 'Managing the Impact of Growth and Development', and DP26 'Managing the Impact of Development on Occupiers and Neighbours'.

6.89 The residential properties which are most likely to be affected by the development are Nos. 12-23 Camden Gardens, No. 148 Camden Street, Nos. 1A & 1B Bonny Street and the Regents Canalside.

6.90 No. 1 Bonny Street is a commercial property and as such is not afforded the same level of protection as the residential properties in the area. The directly adjoining property to the north east, Morgan House, has no rear garden or west facing windows and as such there is a limited impact on this property.

Privacy and overlooking

6.91 Camden Planning Guidance 6 (Amenity) states that an 18m separation is normally considered acceptable to maintain privacy between windows.

Nos. 12-23 Camden Gardens

6.92 The nearest windows at Nos. 12-23 Camden Street are approximately 22m from the nearest proposed windows and as such adequate privacy is maintained.

No. 148 Camden Street and Nos. 1A & 1B Bonny Street

6.93 The nearest windows at No. 148 Camden Street and Nos. 1A & 1B Bonny Street are approximately 16m and 17.5m, respectively, from the nearest windows on the proposed development. Views across streets are common between residential properties. In addition, there are existing street trees between the two sites which will reduce direct visibility.

Regents Canalside

6.94 None of the proposed windows directly face those in the Regents Canalside development. There will be views from the courtyard terrace out across the rear elevation of Canalside, but the angle would be too steep to result in material overlooking.

Other

6.95 The windows and open space of the other properties in the vicinity of the site are at least 18m from the proposed windows or screened by existing and/or proposed vegetation and as such are not considered to be unreasonably impacted by the proposal.

6.96 The proposed roof terraces have generally been cited away from private windows and amenity space. A condition will be included requiring that all flat areas not specifically identified as being terrace on the drawings not be accessed other than

for maintenance to avoid overlooking of adjoining properties.

Outlook and Sense of Enclosure

Nos. 12-23 Camden Gardens

6.97 The proposal is not considered to result in unacceptable loss of outlook or sense of enclosure to these properties as they are located 22m – 29m from the proposal, the outlook from several existing windows are compromised from overhanging walkways and the primary outlook of these units is out over the canal.

No. 148 Camden Street

6.98 The proposal is not considered to result in unacceptable loss of outlook or sense of enclosure to these properties as they are located 16m from the subject proposal and have an alternative outlook out to the east and west.

Nos. 1A & 1B Bonny Street

6.99 The proposal is not considered to result in unacceptable loss of outlook or sense of enclosure to these properties as they are located 16m from the proposal, several of their front windows do not look directly out over the development site, and they have unobstructed outlooks in other directions.

Morgan House

6.100 The proposal is not considered to result in unacceptable loss of outlook or sense of enclosure to this property because it does not have a traditional open rear garden and the rear windows are already fully enclosed by the existing building.

Nos. 2 – 8 Bonny Street

6.101 The proposal is not considered to result in unacceptable loss of outlook or sense of enclosure to these properties as they are separated from the subject site by Morgan House which is itself of significant bulk, and the rear gardens maintain an outlook to the south and east.

Regents Canalside

6.102 None of the windows in the Regents Canalside directly face the development and all external areas of open space have open outlooks away from the bulkiest part of the proposed development.

Other

6.103 It is considered that the other properties not mentioned above are either sufficiently located away from the development or have alternative acceptable outlooks.

Daylight, sunlight and overshadowing

6.104 The application is supported by a Daylight & Sunlight assessment by Anstey Horne that considers relationships to the immediate neighbours as well as further afield against the criteria of the Building Research Establishment (BRE) 'Site Layout

Planning for Daylight and Sunlight: A Guide to Good Practice’.

6.105 It should be noted that BRE is a set of recommended guidelines and should be interpreted flexibly in an overall assessment of amenity impact.

6.106 The study variously makes use of 4 standards in the assessment of existing versus proposed daylight and sunlight access:

- Vertical Sky Component (VSC) - A measure of the amount of sky visible at the centre of a window.
- Daylight Distribution (DD) - The area at desk level inside a room that will have a direct view of the sky
- Average Daylight Factor (ADF) - A measure of the ratio of the luminance in a room to the external unobstructed sky
- Annual Probable Sunlight Hour (APSH) - A measures of the amount of sunlight that windows within 90 degrees of due south receive and is a measure of the number of hours that direct sunlight reaches unobstructed ground across the whole year and also as a measure over the winter period

6.107 The report has identified the following properties as being most likely affected by overshadowing from the proposed development:

6.107.1 *Nos. 12-23 Camden Gardens*

- 8 of 30 windows (27%) would pass the VSC standards. The remaining windows would fail by an average of 29%.
- 13 of 30 windows (43%) would pass the DD standards. The remaining windows would fail by an average of 38%.
- The APSH was not tested for these windows because they are not within 90 degrees of due south (do not receive material direct sunlight)

The worst affected windows are those that are recessed under walkways, which restrict the existing VSC and DD. The windows that don't comply are mostly kitchens and bedrooms. The primary living spaces and outlook are on the other side of the building looking out over the canal.

6.107.2 *No. 148 Camden Street*

- 13 of 15 windows (87%) would pass the VSC standards. The remaining windows would fail by an average of 9%.
- All of the windows would pass the DD and APSH standards.

The ground floor level appears to contain only a lobby. One of the windows that does not meet the standards has a secondary window out over Camden Street which provides alternative light.

6.107.3 *Nos. 1A & 1B Bonny Street*

- 13 of 16 windows (81%) would pass the VSC standards. The remaining windows, a kitchen and living room, would fail by an average of 5%.

- All of the windows would pass the DD standards.
- All of the windows would pass the APSH 'all-year' standard. The kitchen window and one of the two living room windows of 1A Bonny Street would not meet the winter sunlight requirements.
- 6 of 7 rooms (86%) would pass the ADF standards. The living room of 1B Bonny Street is already below the standard but would be reduced a further 5%.

The non-compliances are not considered to be of a scale to justify refusal of the application.

6.107.4 *Regents Canalside*

- All windows would satisfy all BRE criteria.

6.108 The other residential units not mentioned above are located further from the subject site and as such will be impacted less.

6.109 Subsequent to submission of the daylight study the applicant revised the plans reducing the bulk of Blocks A & B on Bonny Street. This will reduce the impact of the proposal on the properties opposite Bonny Street.

6.110 For the reasons listed above the proposal is considered to have an acceptable impact on the daylight and sunlight of adjoining properties.

Noise and general disturbance

6.111 In respect of noise and general disturbance, the council's environmental health team raises no objection to the proposal. Any noise is consistent with the continuing residential use of the site, it being noted that any unreasonable or excessive noise or disturbance is covered by the Environmental Protection Act 1990.

Canal Amenity

6.112 The proposal would result in tall building directly on the canal. However, the proposal is considered to have an acceptable impact on the amenity of canal users for the following reasons:

- The buildings are to the north of the canal and as such will not materially overshadow it.
- The impact of Block C would be diminished by the existing BTP parking bridge.
- Block D would be the same height as the adjoining element of Regent's Canalside.
- The proposal would add lighting to the area under the adjoining BTP parking bridge.
- The existing building provides a blank and uninteresting frontage to the canal whereas the proposal would present a building of varied materials, glazing, setbacks and balconies.
- The proposal will be required, by condition, to provide improved planting along the canal.
- This section of the canal is considered to be a transitional section of the canal between the more open and public Camden Town and the Kings Cross

sections.

- It is not unusual for louvered openings to plant rooms to be located onto the canal.
- The applicant does not have the ability to compel the BTP to remove the parking structure.

Community Safety

6.113 LDF policy CS17 and London Plan policy 7.3 require developments to demonstrate that they have incorporated design principles that contribute to community safety and security, particularly in areas with relatively high levels of crime, such as Camden Town.

6.114 The Applicant has submitted a *Secured by Design* report that outlines the measures that will be taken to reduce the likelihood of the incidence of crime.

6.115 The proposal by its very nature and location will provide increased passive surveillance of the surrounding area, most importantly to the canal, discouraging anti-social behaviour. The proposal includes measures that are considered to adequately respond to the Secured by Design criteria

Construction

6.116 The Applicant has submitted a draft Construction Management Plan (CMP) to address the impacts associated with the construction phase including noise, air pollution, traffic and parking and safety, demolition waste and debris. Based on the scale of the development it is considered that a more detailed CMP should be secured by way of s106 legal agreement to enable review and appropriate monitoring. As part of the development of the CMP, the Applicant will be required to engage with the local community relating to specific details of the plan.

6.117 Subject to such an agreement, it is considered that the proposal would not pose an unacceptable level of harm to the amenity of adjoining occupiers and thereby accords with policies CS5 and DP26 of the LDF and Camden Planning Guidance.

Transport

6.118 Policy CS11 seeks to promote sustainable transport including walking, cycling, public transport and improvements to streets and places.

Car Parking

6.119 DP18 states that, "*the Council will expect development to be car free in the Central London Area, the town centres of Camden Town, Camden Street / Swiss Cottage, Kentish Town, Kilburn High Road and West Hampstead, and **other areas within Controlled Parking Zones that are easily accessible by public transport***" (emphasis added). CPG7 states that 'highly accessible areas' are those that exceed a PTAL of 4.

6.120 The site has a Public Transport Accessibility Level (PTAL) of 6b (excellent). The site is within a short walk of an Underground station (5 min), Overground station (2 min) and numerous bus routes on Camden Street (2 min). As such the proposal would be expected to be a car-free development. Specifically, no regular private car

parking would be considered acceptable on site and residents would not be considered eligible for access to the on-street car parking scheme. These restrictions would be formally secured through a s106 legal agreement.

6.121 The proposal does not include any off-street car parking. Council, funded by the developer, will provide an on-street disabled parking space on Bonny Street to the front of the site.

Bicycle Parking

6.122 A key aim is to promote cycling in the borough and this is detailed in Camden's Transport Strategy, CS11 (Promoting Sustainable and Efficient Travel), DP17 (Walking, Cycling and Public Transport), and CPG7 (Transport).

6.123 The proposal includes a total of 128 cycle parking spaces (24 commercial, 12 social rented, 28 shared ownership, and 64 market) in 4 separate secure internal rooms. All spaces will be accessible either directly from street level or via a lift. The commercial area includes showers, changing areas and lockers to encourage cycling to work. As such the proposal is in keeping with the latest revised cycle parking standards in the London Plan. The cycle parking will be secured via condition.

6.124 It is also considered that workplace and residential travel plans should be development to encourage people to travel by sustainable means of transport. Such plans will be secured via legal agreement (including an appropriate administration contribution).

Servicing

6.125 The existing building has two off-street servicing accesses from Bonny Street which will be removed as part of the proposal. The street between these two areas is occupied by a large on-street loading bay. Part of this bay will be converted to an on-street disabled parking bay and the remainder will continue to be a loading bay. As such it will likely be used for deliveries and waste collection. The section of Camden Street in front of the site is a 'single yellow' line road and as such can also accommodate temporarily stopping vehicles to load and set-down/pick-up passengers.

6.126 Notwithstanding, due to the size of the site, the lack of off-street servicing, and as the application site partially fronts Camden Street (which forms part of the TLRN) a Service Management Plan (SMP) is considered to be required to ensure that service vehicles do not have an unacceptable impact on the traffic network. Such a plan will be secured by legal agreement.

Construction

6.127 If the council was minded to approve the scheme, Highways officers request that a Construction Management Plan is secured through a s106 legal agreement. The reasons for this requirement are:

- The proposal includes significant demolition and construction works and will result in a large number of construction vehicle movements to and from the site.
- Bonny Street is on the edge of a Conservation Area and particular care needs to be taken when using adjacent roads

- Full consultation would need to take place within the surrounding neighbourhood
- Part of the site has a frontage on to Camden Street which forms part of the TLRN, as such TfL would need to be consulted on the CMP
- Pedestrian permeability and safety needs to be a priority on the footway, which has a relatively high footfall, during any periods of demolition / construction
- The CMP would need to be a carefully constructed document as there are many factors in this location which need careful consideration

6.128 The CMP will be required to include agreement to the Considerate Contractors Scheme and consultation with local residents.

Access

6.129 Currently there are two crossovers enabling vehicular access to the site. The plans submitted demonstrate that these crossovers would be redundant for the proposed development. The crossovers would be removed and the kerb reinstated at the Applicant's expense (secured via s106).

6.130 The s106 obligation would also require plans demonstrating interface levels between development thresholds and the Public Highway to be submitted to and approved by the Highway Authority prior to implementation.

Sustainability & Energy Efficiency

6.131 LDF policies CS13 and DP22 as well as CPG3 require that development reduce the effects of and adapt to climate change, consider local energy generation, carbon reduction measures, water and flooding. The London Plan also sets region wide targets for energy efficiency.

6.132 The application is accompanied by a residential Code for Sustainable Homes pre-assessment, a commercial BREEAM pre-assessment and an Energy Strategy.

6.133 A Code for Sustainable Homes (CfSH) pre-assessment has been submitted, detailing that the proposed scheme can meet the required Level 4. A total score of 70.36% is anticipated, above the 68% Level 4 minimum, thereby complying with policies CS13, DP22 and CPG3. In respect of the specific categories the proposals exceed 50% of the available credits stipulated by CPG3 in each instance (energy - 62.9%; water - 66.7%; materials - 58.3%).

6.134 A BREEAM commercial pre-assessment has been submitted, detailing that the proposed scheme can meet the 'excellent' standard, one higher than the required 'very good' standard. A total score of 70.54% is anticipated, above the 70% 'excellent' minimum, thereby complying with policies CS13, DP22 and CPG3. In respect of the specific categories the proposals significant exceeds the target of the available credits stipulated by CPG3 for water (77.8% vs. 40% target) and materials (83.3% vs. 40% target) but falls slightly short in the energy category (52.0% vs. 60% target). This minor inconsistency is considered to be acceptable given the minor non-compliance, the fact the proposal meets the excellent standard as opposed to the very good standard, and the significant over-compliance with the other categories.

6.135 An Energy Strategy, which follows the approach outlined in the London Plan, LDF policies CS13, DP22 and DP23 and CPG3, has also been submitted. Most notably

the three steps of the energy hierarchy of 'be lean', 'be clean' and 'be green' have been incorporated. In overall terms it is concluded that carbon dioxide emissions are anticipated to be reduced by 35% in comparison with the Part L 2013 Building Regulations which is a policy compliant level. This will be achieved through a variety of means, including high performing thermal fabric, energy efficient equipment, gas fired CHP unit, absorption chillers, and PV panels. CPG3 also seeks to target a 20% reduction in carbon dioxide emissions through on-site renewable energy technologies. The proposal would result in a 5.4% reduction. This is considered to be acceptable as any increase in PVs would compromise the green roof and amenity areas, and the other renewable technologies were reasonably discounted for practicality concerns.

6.136 With regard to drainage, no information was submitted with regard to Sustainable Urban Drainage (SUDS). Thames Water has advised that they do not consider the existing sewerage network to be capable of supporting runoff from the subject site. Policy requires that a 50% reduction in surface water run off rate be provided. As such a condition will be included requiring that an adequate drainage strategy is implemented.

6.137 With regard to air quality, the proposal includes Combined Heat & Power which will produce exhaust gases which could have an air quality impact upon existing and future occupants. The air quality report submitted with the application is considered to adequately demonstrate that, subject to a condition requiring details of the proposed CHP specification, flue location, and the like, that the proposal will be overall 'air quality neutral'.

6.138 Overall, the proposal is considered to provide an adequate level of sustainability. As part of the s106 legal agreement design stage and post construction testing will be required to ensure that the finished building is in keeping with above stated standards (this will not include Code for Sustainable Homes testing which was recently withdrawn by central government).

Trees, Biodiversity and Landscaping

6.139 There are no trees on the existing site and due to near 100% site coverage, none are proposed. There are 4 street trees on Bonny Street in close proximity to the proposed excavation and buildings. The application is accompanied by a tree report by a qualified arborist that concludes that all trees can be safely maintained subject to adequate tree protection measures. A condition will be included requiring that sufficient tree protection measures take place.

6.140 There are several small informal shrubs surrounding the existing buildings which will be lost. It is considered that replacement planting can be accommodated, specifically along the canal frontage. A condition will be included requiring details of such planting prior to construction.

6.141 The application includes a Biodiversity & Ecological Assessment that concludes that it is unlikely the existing shrubs on the edges of the site are of ecological significance. The report makes several recommendations, including bat and bird boxes, which have been included in the recommendation.

6.142 The application includes several roof top terrace areas which will provide additional amenity space to the occupants of the development. Further details are considered

to be necessary and will be secured by condition.

6.143 The proposal includes green roof areas (approximately 700sqm) and a green wall (115sqm) which would provide for biodiversity, reduce surface water runoff, enhance the landscaped appearance of the site and improve the microclimate in the vicinity of the site. Sufficient details of the green roof, including soil depth, have not been provided and as such a condition is recommended requiring details of the roof prior to construction.

6.144 The Applicant has agreed to fund York stone paving on the footway adjacent the site on Bonny Street and Camden Street, which is considered to be a higher quality material than the usual concrete pavers employed by Camden. The costs for these works are secured in the s106 legal agreement.

Planning obligations

6.145 In accordance with CS19 'Delivering and Monitoring the Core Strategy' and CPG8 'Planning Obligations' the following additional obligations are considered appropriate to meet the particular needs and requirements for the operation of the scheme and to mitigate identified impacts to make the scheme acceptable.

Local Procurement Plan

6.146 The proposal would result in additional construction jobs in the borough. In order to ensure that the proposal adequately provides for training of local people a clause will be included in the legal agreement requiring the following:

- Target of 20% local recruitment;
- Advertise all construction vacancies and work placement opportunities exclusively with the Kings Cross Construction Skills Centre for a period of 1 week before marketing more widely;
- Provide 2 work placement opportunities of not less than 2 weeks each, to be undertaken over the course of the development, to be recruited through the Council's Kings Cross Construction Skills Centre;
- CMP Local Procurement Code;
- 2 apprenticeships plus £1,500 per apprentice monitoring fee.

Public open space, educational infrastructure, community facilities

6.147 The proposal would result in additional residents and an associated increase in demands on existing local open space, education and community infrastructure. The development would be liable for Camden CIL, which would cover the costs of such infrastructure.

Highways

6.148 The proposal would require works likely to damage the footway surrounding the site. The Applicant has Given the size of the site a contribution of £47,231.56 towards such works is considered to be appropriate.

6.149 The proposal would involve a change in the way that pedestrians access the site and move in and around the site. As such, based on the size of the development, it is considered that a £52,000.00 contribution to public realm infrastructure is required.

Mayoral Community Infrastructure Levy

6.150 The development would be liable to the Mayor's Community Infrastructure Levy (CIL) because it involves the creation of additional residential units and an increase in floor space. Based on the Mayor's CIL charging schedule and the information given on the plans, the charge will be approximately £155,300.00 (3,106sqm x £50/sqm, not including affordable housing floorspace).

Camden Community Infrastructure Levy

6.151 The development would be liable to Camden's Community Infrastructure Levy (CIL) because it involves the creation of additional residential units and an increase in floor space. The size is in Zone B and as such, based on the Camden CIL charging schedule, and the information given on the plans, the charge will be approximately £565,450.00 (Residential 69.2% uplift @ £250/sqm, Commercial 30.8% uplift @ £25/sqm, not including affordable housing floorspace).

6.152 The CILs will be collected by Camden after the scheme is implemented and could be subject to surcharges for failure to assume liability, for failure to submit a commencement notice and/or for late payment, and subject to indexation in line with the construction costs index. A standard informative is attached to the decision notice drawing CIL liability to the Applicant's attention.

7 CONCLUSION

7.1 The proposal is considered to be a high quality scheme that will be in keeping with the character of the area, and provide additional housing, including affordable housing, in an area with a high level of accessibility on an underutilised brownfield site.

8 RECOMMENDATION

8.1 Grant Planning Permission subject to a S106 Legal Agreement with the following Heads of Terms:

- Affordable housing on-site (6 social rent, 6 affordable) including Deferred Affordable Housing Contribution (max £3,657,000);
- BREEAM (excellent) design stage and post-construction review;
- Energy strategy (35% below Part L 2013, 20% renewable) design stage and post-construction review;
- Local Construction Apprenticeships and Work Placements (2 each, + £3,000 monitoring fee);
- Local Procurement Plan
- Highways – Servicing Management Plan
- Highways – Demolition & Construction Management Plan;
- Highways – Approval in principle for works & fee (£4,500.00);
- Highways – Repaving and repair works (£47,231.56);
- Highways – Pedestrian and environmental improvements contribution (£52,000.00);
- Highways – Car free housing;
- Highways – Level plans;

- Highways – Residential & Workplace Travel Plans inc. monitoring fee (£6,002.00);
- Canal Improvements Plan
- Basement Construction Plan

9 LEGAL COMMENTS

9.1 Members are referred to the note from the Legal Division at the start of the Agenda.

APPENDIX 1 - Conditions and Reasons

1. The development hereby permitted must be begun not later than the end of three years from the date of this permission.

Reason: In order to comply with the provisions of Section 91 of the Town and Country Planning Act 1990 (as amended).

2. The development hereby permitted shall be carried out in accordance with the following approved plans:

Existing & Demolition Drawings: D-CSC2-A100; D-CSC2-A101; D-CSC2-A102; D-CSC2-A103; D-CSC2-A104; D-CSC2-A105; D-CSC2-A201; D-CSC2-A202; D-CSC2-A203; D-CSC2-A204; D-CSC2-A205; D-CSC2-A206; D-CSC2-A207; D-CSC2-A208; D-CSC2-A209.

Proposed Drawings: D-CSC3-A110-D; D-CSC3-A111-D; D-CSC3-A112-E; D-CSC3-A113-E; D-CSC3-A114-E; D-CSC3-A115-E; D-CSC3-A116-E; D-CSC3-A117-E; D-CSC3-A118-E; D-CSC3-A119-E; D-CSC3-A120-E; D-CSC3-A121-E; D-CSC3-A122-B; D-CSC3-A123-B; D-CSC3-A211-C; D-CSC3-A212-D; D-CSC3-A213-D; D-CSC3-A214-C; D-CSC3-A215-D; D-CSC3-A216-E; D-CSC3-311-D; D-CSC3-312-C; D-CSC3-313-C; D-CSC3-314-E and D-CSC3-315.

Supporting Documents & Background Papers: Affordable Housing Statement including Planning Obligations by Douglas Birt Consulting dated Feb 2015; Air Quality Assessment Update by Air Quality Consultants dated 20/02/15; Arboricultural Impact Assessment Ref: CHL/CMD/AIA/03a by Landmark Trees dated 08/12/14; Basement Impact Assessment v6 by Price & Myers dated May 2015; Biodiversity and Ecological Assessment June by The Ecology Consultancy dated 04/06/14; BREEAM Report v3 by Price and Myers dated 26/06/14; Camden Street Materials Statement by Price & Myers undated; Code of Sustainable Homes Pre-Assessment Report v2 by Price and Myers dated 16/12/14; Construction Management Plan by Chassay + Last dated 09/12/14; Daylight within the Proposed Development by Anstey Horne dated 08/12/14; Daylight & Sunlight Report by Anstey Horne dated 09/12/14; Daylight & Sunlight Report Addendum Letter by Anstey Horne dated 19/02/15; Design & Access Statement (Including Waste Storage & Collection Strategy) by Chassay + Last dated Dec 2014; Design & Access Statement Addendum by Chassay + Last dated July 2015; Energy Strategy Report by Price and Myers dated 16/12/14; Energy Strategy Report Addendum v2 by Price & Myers dated 23/02/15; Existing Commercial

Employment and Marketing Report by Goldstein Leigh dated 01/06/14; Existing Commercial Schedule of Accommodation by Chassey & Last dated 15/12/14; Independent Review of Assessment of Viability by BPS Chartered Surveyors dated 09/03/15; Independent Review of Assessment of Viability Addendum by BPS Chartered Surveyors dated 14/05/15; Landscape Design & Access Statement by Turkington Martin dated Dec 2014; Letter Replying to Viability Analysis from Allsop dated 11/05/15; Letter Replying to Review of Viability from Douglas Birt Consulting dated 01/07/15; Letters Replying to BIA review from Price & Myers dated 14/05/15 & 10/06/15; Lifetime Homes Statement and Wheelchair Accessibility Rev A by Chassay + Last dated Feb 2015; Marketing Letter from Roy Hayim dated 06/11/13; Noise Impact Assessment by Hann Tucker Associates dated 01/12/14; Planning Statement by CgMs Consulting dated Dec 2014; Revised Schedule of Accommodation by Chassy & Last dated 22/06/15; Statement of Community involvement by Bellenden dated Dec 2014; Secured by Design by Chassay + Last dated Dec 2014; Service Strategy by KUT Associates dated 15/07/13; Services Strategy for the Provision of Building Services v5 by KUT Associates dated 02/02/15; Structural Engineering Design Summary by Price & Myers dated May 2015; Townscape, Heritage and Visual Impact Assessment by City Designer dated 10/12/14; Townscape, Heritage and Visual Impact Assessment Addendum by City Designer dated 19/02/15; Townscape, Heritage and Visual Impact Assessment Addendum 2 by City Designer dated 03/07/15; Transport Statement by TTP Consulting dated Dec 2014; and Viability Report relating to Employment Floorspace by Currell Commercial dated 17/12/14

Reason: For the avoidance of doubt and in the interest of proper planning.

3. Prior to commencement of the relevant phase of the works, detailed drawings, and/or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the local planning authority before the relevant part of the development is begun:
 - a) Plan, elevation and section drawings, including jambs, head and cill, of all new external window and door including shopfronts at a scale of 1:10;
 - b) Typical details of new railings and balustrade at a scale of 1:10, including method of fixing;
 - c) Details elevations and section showing typical facing brick arrangement including expansion joints and brick detailing;
 - d) Samples and manufacturer's details of new facing materials including brickwork, windows and door frames, glazing, balconies, balustrades, metal cladding; glazed tiles and faience and any other facing materials;
 - e) A sample panel of brickwork for each brick colour and brick pattern (inc. 'hit-and-miss' elements and feature walls) being no less than 1m by 1m including junction with window opening demonstrating the proposed colour, texture, face-bond, pointing, expansion joints and vertical and horizontal banding. Submission in respect of this sample means erection on site for inspection and approval by the local planning authority.

The relevant part of the development shall be carried out in accordance with the details thus approved and all approved samples shall be retained on site during the course of the works.

Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy CS14 of the London Borough of Camden Local Development Framework Core Strategy and policies DP24 and DP25 of the London Borough of Camden Local Development Framework Development Policies.

4. Prior to the commencement of work on the superstructure full details of hard and soft landscaping and means of enclosure of all un-built, open areas shall have been submitted to and approved by the local planning authority in writing. Such details shall include details of proposed screening, roof terrace design, roof terrace planting, and canal side planting and a programme for implementation. The development shall not be carried out otherwise than in accordance with the details thus approved.

Reason: To ensure that the development achieves a high quality of landscaping which contributes to the visual amenity and character of the area in accordance with the requirements of policy CS14 and CS15 of the London Borough of Camden Local Development Framework Core Strategy and policies DP24 and DP25 of the London Borough of Camden Local Development Framework Development Policies.

5. All hard and soft landscaping works shall be carried out in accordance with the approved landscape details by not later than the end of the first planting season following completion of the development. Any trees or areas of planting which, within a period of 5 years from the completion of the development, die, are removed or become seriously damaged or diseased, shall be replaced as soon as is reasonably possible and, in any case, by not later than the end of the following planting season, with others of similar size and species, unless the local planning authority gives written consent to any variation.

Reason: To ensure that the landscaping is carried out within a reasonable period and to maintain a high quality of visual amenity in the scheme in accordance with the requirements of policies CS14 and CS15 of the London Borough of Camden Local Development Framework Core Strategy and policies DP24 and DP25 of the London Borough of Camden Local Development Framework Development Policies.

6. The following schedule of cycle parking facilities shall be provided in their entirety prior to the first occupation of any of the new units and permanently retained thereafter

Commercial: 24 spaces
Social Rented: 12 spaces
Shared Ownership: 28 spaces
Private: 64 spaces
Total: 128 spaces

Reason: To ensure the development provides adequate cycle parking facilities in accordance with the requirements of policy CS11 of the London Borough of Camden Local Development Framework Core Strategy and policies DP17 and DP18 of the London Borough of Camden Local Development Framework Development Policies.

7. Prior to the commencement of work on the superstructure, a plan showing details of the green roof and green wall including species, planting density, substrate and a section at scale 1:20 showing that adequate depth is available in terms of the construction and long term viability of the green roof, and a programme for a scheme of maintenance shall be submitted to and approved in writing by the local planning authority.

The green roof and green wall shall be fully provided in accordance with the approved details prior to first occupation and shall be retained and maintained in accordance with the approved scheme of maintenance thereafter.

Reason: To ensure that the green roof and green wall are suitably designed and maintained in accordance with the requirements of policies CS13, CS14, CS15 and CS16 of the London Borough of Camden Local Development Framework Core Strategy and policies DP22, DP23, DP24 and DP32 of the London Borough of Camden Local Development Framework Development Policies.

8. No impact piling shall take place until a piling method statement, prepared in consultation with Thames Water or the relevant statutory undertaker, detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works, has been submitted to and approved in writing by the local planning authority. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

Reason: To safeguard existing below ground public utility infrastructure and controlled waters in accordance with the requirements of policy CS13 of the London Borough of Camden Local Development Framework Core Strategy.

9. Prior to the commencement of work on the superstructure full details of a sustainable urban drainage system, detailing any on and/or off site drainage works shall be submitted to and approved in writing by the local planning authority. Such a system should be designed to accommodate all storms up to and including a 1:100 year storm with a 30% provision for climate change, and shall demonstrate a 50% reduction in run off rate from the existing condition. This shall also include details of how the system shall be maintained and managed after completion

The system shall be completed before the development is occupied and thereafter retained and maintained.

Reason: To reduce the rate of surface water run-off from the buildings and limit the impact on the storm-water drainage system in accordance with policies CS5, CS13 and CS16 of the London Borough of Camden Local Development Framework Core Strategy and policies DP22, DP23 and DP32 of the London Borough of Camden Local Development Framework Development Policies.

10. Prior to the commencement of work on the superstructure, a Combined Heat & Power (DHP) specification (model, size, emissions), flue position & required

abatement measures, confirming compliance with the Mayor's BAND B NO_x emissions limits of 95mg/Nm³ together with full dispersion modelling assessing the impact of the proposed CHP engine on receptors identified in the approved Air Quality Assessment (revised March 2015) - Air Quality Consultants along with a programme of implementation shall be submitted to and approved in writing by the local planning authority.

The submitted details shall also include proposed air inlet positions together with details of any NO_x scrubbing system in accordance with the approved Air Quality Assessment (revised March 2015) - Air Quality Consultants.

The relevant part of the development shall be carried out in accordance with the details thus approved and shall be retained and maintained thereafter.

Reason: To ensure the amenity of future occupants in accordance with the requirements of policy CS5 and CS16 of the London Borough of Camden Local Development Framework Core Strategy and policies DP26 and DP32 of the London Borough of Camden Local Development Framework Development Policies.

11. The lifetime homes features and facilities, as indicated on the drawings and documents hereby approved shall be provided in their entirety prior to the first occupation of any of the new residential units.

Reason: To ensure that the internal layout of the building provides flexibility for the accessibility of future occupiers and their changing needs over time, in accordance with the requirements of policy CS6 of the London Borough of Camden Local Development Framework Core Strategy and policy DP6 of the London Borough of Camden Local Development Framework Development Policies.

12. The noise level in rooms at the development hereby approved shall meet the noise standard specified in British Standard BS8233:2014 for internal rooms and external amenity areas. Details of noise protection measures within the development shall be submitted to and approved by the local planning authority prior to the commencement of work on the superstructure. Approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.

Reason: To ensure the occupiers of the proposed flats are not unduly disturbed by nuisance from traffic noise, in accordance with policy CS5 of the Camden Core Strategy and policies DP26 and DP28 of the Camden Development Policies of the Camden Local Development Framework.

13. Prior to the commencement of work on the superstructure, details shall be submitted to and approved in writing by the local planning authority, of an enhanced sound insulation value $D_{nT,w}$ and $L'_{nT,w}$ of at least 5dB above the Building Regulations value, for the floor/ceiling/wall structures separating different types of rooms/uses in adjoining dwellings (namely the living room and kitchen above the bedroom of a separate dwelling). Approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.

Reason: To ensure the occupiers of the proposed flats are not unduly disturbed by nuisance from traffic noise, in accordance with policy CS5 of the Camden Core Strategy and policies DP26 and DP28 of the Camden Development Policies of the Camden Local Development Framework.

14. Prior to the commencement of work on the superstructure a plan showing details of bird and bat box locations and types and indication of species to be accommodated shall be submitted to and approved in writing by the local planning authority. The boxes shall be installed in accordance with the approved plans prior to first occupation of the development and permanently retained thereafter.

Reason: In order to secure appropriate features to conserve and enhance wildlife habitats and biodiversity measures within the development, in accordance with the requirements of the London Plan (Consolidated with Alterations Since 2004) and Camden Planning Guidance 2006 and policy CS15 of the London Borough of Camden Local Development Framework Core Strategy.

15. No part of the flat roof areas hereby approved, other than those specifically indicated as such on the approved drawings, shall be used as roof terraces. Other than the approved roof terraces, the use of these flat roof areas shall be for maintenance purposes only.

Reason: In order to prevent any detrimental impacts of overlooking and/or noise and disturbance of the neighbouring premises in accordance with the requirement of policy CS5 of the London Borough of Camden Local Development Framework Core Strategy and policies DP26 and DP28 of the London Borough of Camden Local Development Framework Development Policies.

16. All trees growing on adjoining sites and public land shall be retained and protected from damage prior to commencement of works on site in accordance with the approved protection details in Arboricultural Impact Assessment Ref: CHL/CMD/AIA/03a by Landmark Trees dated 08/12/14.

Reason: To ensure that the development will not have an adverse effect on existing trees and in order to maintain the character and amenity of the area in accordance with the requirements of policy CS15 of the London Borough of Camden Local Development Framework Core Strategy.

17. No lights, meter boxes, flues, vents or pipes, and no telecommunications equipment, alarm boxes, television aerials, 'man-safe' rails or satellite dishes shall be fixed or installed on the external face of the buildings hereby permitted, without the prior approval in writing of the local planning authority.

Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy CS14 of the London Borough of Camden Local Development Framework Core Strategy and policies DP24 and DP25 of the London Borough of Camden Local Development Framework Development Policies.

18. No development shall take place until a suitably qualified chartered engineer with membership of the appropriate professional body has been appointed to inspect, approve and monitor the critical elements of both permanent and temporary basement construction works throughout their duration to ensure compliance with the design which has been checked and approved by a building control body. Details of the appointment and the appointee's responsibilities shall be submitted to and approved in writing by the local planning authority prior to the commencement of development. For the duration of the construction works details of any subsequent change or reappointment shall be submitted to and approved in writing by the local planning authority.

Reason: To safeguard the appearance and structural stability of neighbouring buildings and the character of the immediate area in accordance with the requirements of policy CS14 of the London Borough of Camden Local Development Framework Development Policies and policy DP27 (Basements and Lightwells) of the London Borough of Camden Local Development Framework Development Policies.

19. At least 28 days before building of the superstructure commences
- (a) a written programme of ground investigation for the presence of soil and groundwater contamination and landfill gas shall be submitted to and approved by the local planning authority; and
 - (b) following the approval detailed in paragraph (a), an investigation shall be carried out in accordance with the approved programme and the results and a written scheme of remediation measures [if necessary], shall be submitted to and approved by the local planning authority.

The remediation measures shall be implemented strictly in accordance with the approved scheme and a written report detailing the remediation shall be submitted to and approved by the local planning authority prior to occupation.

Reason: To protect future occupiers of the development from the possible presence of ground contamination arising in connection with the previous industrial/storage use of the site in accordance with policy CS5 of the London Borough of Camden Local Development Framework Core Strategy and policy DP26 of the London Borough of Camden Local Development Framework Development Policies.

20. Prior to the commencement of development a Risk Assessment and Method Statement (including a programme of implementation) outlining all works to be carried out adjacent to [the canal – must be submitted and approved in writing by the Local Planning Authority. The development shall not be carried out otherwise than in accordance with the approved details.

Reason: To protect the visual amenity and safety of the area in accordance with the requirements of policies CS14 and CS17 of the London Borough of Camden Local Development Framework Core Strategy and policy DP25 of the London Borough of Camden Local Development Framework Development Policies.

21. Prior to the commencement of development a survey of the condition of the waterway wall shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Canal & River Trust.

Reason: To protect the visual amenity and safety of the area in accordance with the requirements of policies CS14 and CS17 of the London Borough of Camden Local Development Framework Core Strategy and policy DP25 of the London Borough of Camden Local Development Framework Development Policies.

22. At the end of the construction work, and prior to occupation of the development the waterway wall should be resurveyed and a report submitted to and approved in writing by the Local Planning Authority in consultation with the Canal & River Trust which outlines evidence of any damage caused to the waterway wall by the construction work and if necessary a method statement and repairs schedule (including a programme of implementation) to make good any damage.

Any such works shall be carried out in accordance with the approved method statement and repairs schedule prior to occupation of the development.

Reason: To protect the visual amenity and safety of the area in accordance with the requirements of policies CS14 and CS17 of the London Borough of Camden Local Development Framework Core Strategy and policy DP25 of the London Borough of Camden Local Development Framework Development Policies.

23. The use of the roof as a terrace shall not commence until the privacy screens, as shown on the approved drawings, have been constructed. The screens shall be maintained and permanently retained thereafter.

Reason: In order to prevent unreasonable overlooking of neighbouring premises in accordance with the requirements of policy CS5 of the London Borough of Camden Local Development Framework Core Strategy and policy DP26 of the London Borough of Camden Local Development Framework Development Policies.

24. The demolition hereby permitted shall not be undertaken before a contract for the carrying out of the works of redevelopment of the site has been completed.

Reason: To protect the visual amenity of the area in accordance with the requirements of policy CS14 of the London Borough of Camden Local Development Framework Core Strategy and policy DP25 of the London Borough of Camden Local Development Framework Development Policies.

25. The waste facility as approved shall be provided and available for use prior to the first occupation of any of the new units and permanently retained thereafter.

Reason: To ensure that sufficient provision for the storage and collection of waste has been made in accordance with the requirements of policy CS18 of

the London Borough of Camden Local Development Framework Core Strategy and policies DP26 and DP28 of the London Borough of Camden Local Development Framework Development Policies.

Informative(s):

1. Your proposals may be subject to control under the Building Regulations and/or the London Buildings Acts which cover aspects including fire and emergency escape, access and facilities for people with disabilities and sound insulation between dwellings. You are advised to consult the Council's Building Control Service, Camden Town Hall, Argyle Street WC1H 8EQ, (tel: 020-7974 6941).
2. The Mayor of London introduced a Community Infrastructure Levy (CIL) to help pay for Crossrail on 1st April 2012. Any permission granted after this time which adds more than 100sqm of new floorspace or a new dwelling will need to pay this CIL. It will be collected by Camden on behalf of the Mayor of London. Camden will be sending out liability notices setting out how much CIL will need to be paid if an affected planning application is implemented and who will be liable.

The proposed charge in Camden will be £50 per sqm on all uses except affordable housing, education, healthcare, and development by charities for their charitable purposes. You will be expected to advise us when planning permissions are implemented. Please use the forms at the link below to advise who will be paying the CIL and when the development is to commence. You can also access forms to allow you to provide us with more information which can be taken into account in your CIL calculation and to apply for relief from CIL.

<http://www.planningportal.gov.uk/planning/applications/howtoapply/whattosubmit/cil>

We will then issue a CIL demand notice setting out what monies needs to paid when and how to pay. Failure to notify Camden of the commencement of development will result in a surcharge of £2500 or 20% being added to the CIL payment. Other surcharges may also apply for failure to assume liability and late payment. Payments will also be subject to indexation in line with the construction costs index.

Please send CIL related documents or correspondence to CIL@Camden.gov.uk

3. Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. You are advised to consult the Council's Compliance and Enforcement team [Regulatory Services], Camden Town Hall, Argyle Street, WC1H 8EQ (Tel. No. 020 7974 4444 or on the website <http://www.camden.gov.uk/ccm/content/contacts/councilcontacts/environment/contact-the-environmental-health-team.en> or seek prior approval under Section 61 of the Act if you anticipate any difficulty in carrying out construction other than within the hours stated above.

4. Your attention is drawn to the fact that there is a separate legal agreement with the Council which relates to the development for which this permission is granted. Information/drawings relating to the discharge of matters covered by the Heads of Terms of the legal agreement should be marked for the attention of the Planning Obligations Officer, Sites Team, Camden Town Hall, Argyle Street, WC1H 8EQ.
5. Under Section 25 of the GLC (General Powers) Act 1983, the residential accommodation approved is not permitted for use as holiday lettings or any other form of temporary sleeping accommodation defined as being occupied by the same person(s) for a consecutive period of 90 nights or less. If any such use is intended, then a new planning application will be required which may not be approved.
6. Prior approval must be sought from the TfL Road Directorate structural team for the construction of the basement floor prior to work commencing on site to ensure that the structural integrity of the TLRN public highway would not be adversely affected.
7. The applicant/developer should refer to the current "Code of Practice for Works affecting the Canal & River Trust" to ensure that any necessary consents are obtained (<http://canalrivertrust.org.uk/about-us/for-businesses/undertaking-works-on-our-property>). The applicant is advised that surface water discharge to the Navigation will require prior consent from the Canal & River Trust. Please contact Nick Pogson from the Canal & River Trust Utilities team (nick.pogson@canalrivertrust.org.uk).
8. No discharge of foul or surface water from the site shall be accepted into the public system until the drainage works referred to in Condition 9 have been completed except during the construction stage.

APPENDIX 2 – Summary of Residential Standards

Floor	Flat No.	Type	Area (sqm)			Amenity	
			Prop.	Req (LP)	Req (CPG2)	Outdoor (sqm)	Outlook
Gr.	A M.1	2B3P	114	61	61	12	N/S
1st	A 1.1	3B5P	90	86	84	6	N/S
	B 1.1	0B1P	39	37	32	2	N
	B 1.2	0B1P	39	37	32	5	N/W
	B 1.3	1B2P	52	50	48	5	W
	B 1.4	2B4P	70	70	75	7	E/W
	C 1.1	3B6P	100	95	93	8	E/W
	C 1.2	1B2P	50	50	48	6	W
	C 1.3	1B2P	50	50	48	6	W
	C 1.4	2B3P	63	61	61	7	W/S
	C 1.5	2B4P	84	70	75	7	S
	C 1.6	1B2P	59	50	48	7	S
	C 1.7	2B4P	79	70	75	6	N/S
2nd	A 2.1	3B5P	90	86	84	7	N/S
	A 2.2	1B2P	54	50	48	7	N/S
	B 2.1	0B1P	39	37	32	2	N
	B 2.2	0B1P	39	37	32	5	N/W
	B 2.3	1B2P	52	50	48	5	W
	B 2.4	2B4P	70	70	75	7	E/W
	C 2.1	3B6P	100	95	93	8	E/W
	C 2.2	1B2P	50	50	48	6	W
	C 2.3	1B2P	50	50	48	6	W
	C 2.4	2B3P	63	61	61	7	W/S
	C 2.5	2B4P	84	70	75	7	S
	C 2.6	1B2P	59	50	48	7	S
C 2.7	2B4P	79	70	75	6	N/S	
3rd	A 3.1	3B5P	87	86	84	15	N/S
	A 3.2	1B2P	50	50	48	7	N/S
	B 3.1	2B3P	77	70	75	9	N/W
	B 3.2	1B2P	52	50	48	5	W
	B 3.3	2B4P	70	70	75	7	E/W
	C 3.1	3B6P	100	95	93	8	E/W
	C 3.2	1B2P	50	50	48	5	W
	C 3.3	1B2P	50	50	48	6	W
C 3.4	3B5P	101	86	84	28	E/SW	
4th	B 4.1	2B4P	85	70	75	36	N/W
	B 4.2	2B4P	70	70	75	57	E/W
	C 4.1	3B5P	89	86	84	8	E/W
	C 4.2	1B2P	50	50	48	6	W
	C 4.3	1B2P	50	50	48	6	W
	C 4.4	2B3P	63	61	61	7	S/W

	C 4.5	1B2P	53	50	48	6	S/E
5th	C 5.1	3B5P	91	86	84	36	W/N/E
	C 5.2	1B2P	50	50	48	6	W
	C 5.3	1B2P	50	50	48	6	W
	C 5.4	2B3P	63	61	61	6	S/W
	C 5.5	1B2P	53	50	48	6	S/E
6th	C 6.1M	3B6P	120	95	93	39	W/N/E
	C 6.2M	2B4P	96	70	75	45	N/W
	C 6.3M	2B4P	96	70	75	45	S/W
	C 6.4M	3B5P	105	86	84	40	E/S/W
	C 6.5	2B3P	64	61	61	6	S/E

APPENDIX 3 – BPS Independent Viability Assessment Report and Addendum

9th March 2015

1.0 INTRODUCTION

- 1.1 BPS Chartered Surveyors has been instructed by the London Borough of Camden (the Council) to review a viability submission prepared by Douglas Birt Consulting (DBC) on behalf of Elebro Limited (the applicant) in respect of a proposed residential development at 140 - 146 Camden Street, London, NW1 9PF.
- 1.2 The site has an area of 0.1522 ha and accommodates a 1950's single storey warehouse, fronting Bonney Street, and a 3-storey office building, fronting Regent's Canal to the south.
- 1.3 The warehouse building has marketed for long periods over recent years without securing an occupier and is currently vacant. The office building is currently occupied by the British Transport Police, which intends to vacate the premises through exercising a break option in its lease in April 2016, as part of its wider plans to consolidate its office premises.
- 1.4 The proposed scheme comprises:
demolition of existing buildings and erection of a part 3, 4, 5 & 8 storey building plus single storey basement level comprising 2000sqm of commercial floorspace and 51 residential units (20 x 1-bed, 20 x 2-bed and 11 x 3-bed) with associated landscaping.
- 1.5 Of the 51 residential units, 12 units are proposed as affordable representing 24% by unit number and 23% by floorspace.
- 1.6 Camden Planning Guidance CPG 2 indicates that mixed-use developments with residential floorspace should provide 50% of the residential element as affordable housing.
- 1.7 The applicant has carried out the scheme appraisal using the GLA Development Control Toolkit. This shows that the residual land value of the proposed scheme is £6,180,000 reflecting a developer profit return of 18.9% some 1.1% below the proposed profit target. The scheme has been benchmarked against an existing use value (EUV) based on the value of the site after a hypothetical total refurbishment of the buildings to provide Grade A media style office accommodation. The proposed EUV figure is £6,180,000. On this basis, the applicant concludes that the scheme cannot further contribute to affordable housing while remaining economically viable as this would generate a further deficit.
- 1.8 In preparing this report we have had specific regard to the viability report prepared by DBC along with its seven appendices. We have also had reference to the information support as part of the planning application. In addition we

requested further supporting evidence from the applicants consultants and subsequently received the following:

- A live model of the GLA Toolkit appraisal
- Supporting evidence for the proposed commercial space valuation by way of recent lettings and current availability schedules
- EUV residual and cash flow valuations dated 2nd March 2015.

2.0 CONCLUSIONS AND RECOMMENDATIONS

- 2.1 The applicant's appraisal identifies a modest shortfall on profit target of 1.1% effectively showing the scheme to be incapable of viably delivering additional affordable housing. The applicant has conceded that a developer's return of 18.9% on GDV is an acceptable profit level and is prepared to commence the scheme on this basis. The proposed on-site affordable housing element is 24% by units opposed to 50% as required by Policy DP3 of the Council's Local Development Framework (adopted version 2010).
- 2.2 For the reasons outlined below we do not regard this proposal as having adequately proven that it represents the maximum contribution viable from this scheme.
- 2.3 The applicant has selected the existing use value (EUV) as the relevant viability benchmark. We remain to be convinced that office space of Grade A quality is achievable within the existing façade due to issues such as an inherent lack of natural light available to the premises. We have analysed refurbishment costs and are of the view that the applicants proposed costs are understated by £972,950.
- 2.4 The EUV has been calculated using a residual valuation that does not take adequately take into account the impact of the proposed refurbishment rents coming on steams in July 2018. In consequence we regard the proposed benchmark as over inflated.
- 2.5 We question the relevance of a high level of land owner premium at a suggested rate of 20% in view of the apparently declining value of the property as it currently stands and the land owners only options being to either redevelopment or take a high risk option on a major refurbishment. We are of the view a 10% premium is a better reflection of the circumstances.
- 2.6 We are of the view that the reduction in proposed unit values is excessive given that over the period since Goldschmidt & Howland previously provided a view on values there has been a net overall increase in values. We do accept that there has been a recent softening in the market, but not to the extent that it should have offset overall price rises.
- 2.7 Circle Housing has offered [REDACTED] for the proposed 12 affordable units. It would be helpful if an indication as to proposed rents and shared ownership values could have been provided in order for the council to evaluate the potential affordability of the units proposed. We note the split proposed does not reflect policy at 50/50.

- 2.8 Local agents Ereira Mendoza have estimated the proposed commercial space valuation. On request, we have viewed the relevant market evidence supporting their estimate and are of the opinion that the valuation is reasonable.
- 2.9 A detailed build cost plan has been prepared by BTP which has been analysed by our retained Cost Consultant, Neil Powling. Neil is satisfied that the build costs are reasonable. All other fees and additional costs are also assessed as reasonable.

3.0 PLANNING CONSIDERATIONS

Planning History

- 3.1 The applicant lodged an application in August 2014, which has since been withdrawn (2014/4679/P). This application proposed:

demolition of existing buildings and erection of a part 3, 4, 5, & 9 storey building with basement to provide 1803 sqm of commercial floorspace and 62 residential units with associated landscaping.

- 3.2 Of the 62 proposed units; 48 were to be private, 5 social rented and 9 shared ownership (23% affordable). Although BPS took the view that the submission lacked elements of information considered necessary for drawing comprehensive conclusions concerning viability, we concluded at that time that the scheme offered potential for generating a development surplus.

Loss of Employment Space

- 3.3 The current proposal provides 2,000 sq.m of commercial floorspace. The planning statement notes that the site currently provides 2,577 sq.m (GIA) of employment floorspace, therefore there would be a net loss incurred through redevelopment of 577 sq m.
- 3.4 As part of the application process the applicant is required by Council policy to demonstrate that the building meets the Council's criteria for justifying loss of employment space by demonstrating, for example, that it is no longer suitable for office use and is not able to meet the needs of modern occupiers.
- 3.5 Policy DP13 states that the Council will retain land and buildings that are suitable for continued business use and will resist a change to non-business unless:

- a. it can be demonstrated to the Council's satisfaction that a site or building is no longer suitable for its existing business use; and*
- b. there is evidence that the possibility of retaining, reusing or redeveloping the site or building for similar or alternative business use has been fully explored over an appropriate period of time.*

Where premises or sites are suitable for continued business use, the Council will consider redevelopment proposals for mixed-use schemes provided that...

- ... d. they include other priority uses, such as housing and affordable housing.*

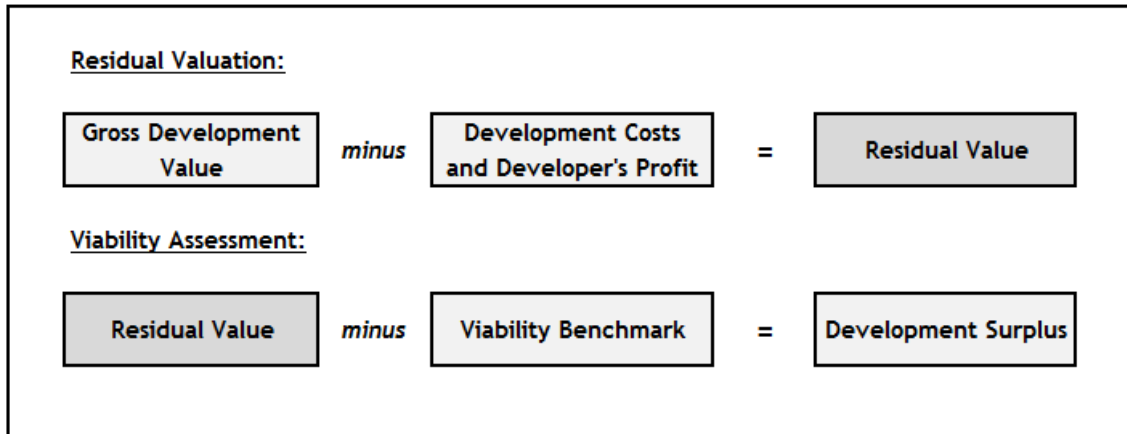
- 3.6 The planning statement notes that the current commercial floorspace is no longer suitable or viable for continued employment use. In particular because:

- The office building is landlocked with no direct vehicle access
 - The lower ground and ground floor levels have very limited access to natural daylight being only adequately provided along the facade leaving large parts in the centre of the floor without natural light. The ground floor is mainly without natural light
 - Past use of the warehouse unit has involved use of delivery vehicles which has apparently caused conflict among the other local residents
 - The warehouse building needs major updating to meet the needs of occupiers
 - The lack of a goods lift within the warehouse
- 3.7 The planning statement also notes that the extensive marketing campaign for the existing units has been in full accordance with the guidance in CPG5 and has failed to identify any prospective tenants for the warehouse.

4.0 BENCHMARK LAND VALUE

Principles of a Viability Assessment

- 4.1 Assessment of viability is based on the principle that if a proposed scheme cannot generate a value that equals or exceeds the current value of the site, it will not proceed. A fundamental issue in considering viability assessments is whether an otherwise viable development is made unviable by the extent of planning obligations or other requirements.
- 4.2 Financial viability for planning purposes is defined by recently published RICS Guidance Note Financial Viability in Planning 2012 as an “objective financial viability test of the ability of a development project to meet its costs including the cost of planning obligations, while ensuring an appropriate site value for the landowner and a market risk adjusted return to the developer in delivering that project.” This reflects the NPPF principle that in order to ensure viability, developments should provide competitive returns to a willing land owner and willing developer to enable them to be deliverable.
- 4.3 Development appraisals work to derive a Residual Value for a proposed scheme, which can then be compared against a viability benchmark so as to indicate whether the proposed scheme is economically viable. This approach can be represented by the simple formula set out below:



- 4.4 Development costs include elements such as planning obligations, professional fees, finance charges and contingencies as well as the necessary level of 'return' that would be required to ensure developers are capable of obtaining an appropriate market risk adjusted return for delivering the proposed development.
- 4.5 It is standard practice, endorsed by RICS Guidance, that when determining planning applications, the aim should be to reflect industry benchmarks. LPAs should therefore disregard specific aspects of the application that are personal to the applicant, except in exceptional circumstances such as personal planning permissions. In formulating information and inputs into viability appraisals, these should accordingly disregard either benefits or dis-benefits that are unique to the applicant, whether landowner, developer or both.
- 4.6 Existing Use Value has been the standard recognised basis for establishing viability as set out in the GLA Toolkit Guidance Notes. In certain circumstances, the viability benchmark can instead be based on an Alternative Use Value (AUV).
- 4.7 The GLA Guidance note states that the existing use value of a site (EUV) is the value of the site in its existing use according to the current planning land use designation and disregarding its development potential. However it adds that there is a well-established and accepted precedent in the appeals and Core Strategy examination processes of assessing viability on the basis of an 'EUV Plus' approach, where the return to land owner can be defined and deemed either acceptable or unacceptable.
- 4.8 The Local Housing Delivery Group Report, "Viability Testing of Local Plans" published in June 2012 suggests that the site value benchmark, "Threshold Land Value" should represent the value at which a typical willing landowner is likely to release land for development. It states that different approaches to Threshold Land Value are currently used within models, including consideration of:
- Current use value with or without a premium
 - Apportioned percentages of uplift from current use value to residual value
 - Proportion of the development value
 - Comparison with other similar sites (market value)

- 4.9 RICS Guidance suggests that the site value benchmark should equate to the market value subject to the following assumption: that the value has regard to development plan policies and all other material planning considerations and disregards that which is contrary to the development plan. The purpose of a viability appraisal is to assess the extent of planning obligations while also having regard to the prevailing property market.
- 4.10 RICS Guidance states that the residual land value (ignoring any planning obligations and assuming planning permission is in place) and current use value represent the parameters within which to assess the level of any planning obligations. Any planning obligations imposed will need to be paid out of this uplift but cannot use up the whole of this difference, other than in exceptional circumstances, as that would remove the likelihood of the land being released for development.
- 4.11 The Guidance (upheld in Planning Appeal Decisions) also states that “the importance of comparable evidence cannot be over-emphasised, even if the supporting evidence is very limited, as seen in court and land tribunal decisions.”

The EUV

- 4.12 A benchmark of £6,180,000 has been proposed based on a valuation of the existing use at a figure of £5,150,000 prepared by Allsops dated 10 February 2015 together with an additional 20% premium. The EUV is based on the assumption that the existing buildings are refurbished to provide Grade A media style accommodation.
- 4.13 On request, DBC has provided the residual valuation prepared by Allsops used to compute the EUV figure. There is also a further cash flow analysis which has been used to compute interest payments over the refurbishment period.
- 4.14 We note that the residual valuation reflects an assumption of an immediate letting with no letting incentives or deferment factor to reflect the period during which works would be undertaken. By contrast the cashflow, which has been used solely to compute interest charges shows that the capitalised income would not come on stream until July 2018 indicating some 18 months allowance for voids and rent free periods from completion of the refurbishment works which appears a realistic assumption.
- 4.15 The cash flow was dated January 2015 and as such would need rebasing, however putting this aspect aside the impact of conventional deferment on the cashflow as modelled would reduce the residual value from £5,146,000 to £3,600,000.
- 4.16 Applying the suggested 20% premium to this reduced figure brings the benchmark to a lower figure of £4,320,000 some £1,860,000 below the figure proposed as the benchmark by the applicant.

Building Design/Adaptability

- 4.17 The EUV assumes a major refurbishment of the both the existing office and warehouse elements to provide Grade A standard accommodation. On the

evidence provided we are not convinced this property could be readily adapted to meet this standard and overcome inherent issues such as the lack of natural light. We note:

The Currell Commercial Viability Report concludes that even if the buildings are refurbished it will not be possible to secure a commercial occupier.

- 4.18 The issue of lack of natural light is noted in the design and access statement and it is questionable how this can be overcome because the building has a nearly 100% footprint of its site and the distance at low ground and ground floor from the exterior walls is such that the penetration of light will inevitably be inadequate.
- 4.19 Given this issue in particular it is also therefore questionable whether the proposed refurbishment could deliver Grade A accommodation without requiring planning consent.
- 4.20 In view of these doubts we are of the view that it would not be unrealistic to have sight of preliminary plans and specification and relevant cost plan demonstrating how the proposed quality of space can be delivered to support the proposed rental values that have been ascribed to the space.

EUV Assumptions

- 4.21 Based on the applicant's assumption, the proposed market rent of the refurbished commercial units is [REDACTED] which has been capitalised at a yield of [REDACTED]
- 4.22 Whilst the supporting market evidence indicates rents and yields appropriate for high quality space as can be seen we are not convinced that the submission adequately demonstrates how such a quality can be delivered without the additional evidence requested in 4.20 above. In consequence we have not been able to derive a sensible view of potential value ascribable to the refurbished space.
- 4.23 Allsop have estimated the proposed costs to refurbish the existing buildings to grade A media-style accommodation at [REDACTED] [REDACTED] on GIA). The report goes on to recommend that refurbishment costs are be verified by a Quantity Surveyor, although no evidence has been provided that this exercise has been undertaken.
- 4.24 Our Quantity Surveyor, Neil Powling has analysed the costs using BCIS mean average data. Neil calculates a realistic total refurbishment cost of £[REDACTED] without any allowance for abnormal costs. This is a difference of £972,950. We also note that this increase in build costs would also increase the contingency allowances and professional fees by circa £145,000. There would also be finance cost implications.
- 4.25 A premium of 20% has been applied to the EUV to reflect a land owner premium as an inducement to bring the site forward for development. It is evident the property is nearing the end of its useful commercial life and it is arguable that it

will continue to decline as an investment without either redevelopment or other very substantial investment in the property.

- 4.26 We question the suitability of applying a 20% premium on EUV given that the land owner can only choose significant high risk investment in a refurbishment or redevelopment given the alternative is to hold a declining asset. Consequently the inducement needed to maintain or increase asset value should be less than say a landowner holding a viable asset with a reasonable economic life remaining.
- 4.27 Following the departure of the current tenant there is also a significant prospect of empty rates liabilities and other costs arising associated with vacant property. As has been pointed out by Allsops, the property represents a large floor area to let given local market demand and this in our view raises the prospect of future liabilities.

Summary

- 4.28 It can be seen that we question
- a) The methodology used to derive the valuation through its failure to account for discounting costs and values over time
 - b) We are of the view the proposed refurbishment costs appear under estimated by some £972,950 with the consequent impact on related costs such as fees, contingencies etc.
 - c) We remain to be convinced that a Grade A refurbishment can be delivered from this space and consequently we have yet to form a view on the likely rents and yields appropriate to the quality of space that can be delivered.
 - d) Associated c) above is whether any substantive refurbishment could be delivered without the need for securing a planning consent.
 - e) We question in light of the current prospects for the building whether a land owner premium at a high level of 20% is appropriate.

5.0 MARKET RESIDENTIAL VALUES

- 5.1 The value of the private sale units has been estimated by local agency Goldschmidt & Howland, in a valuation report, which includes comparable sales evidence and a detailed pricing schedule.
- 5.2 The local area is typified by mixed use developments and benefits from close proximity to Camden Town Centre. It is also characterised by high quality period terraced housing. We understand that the proposed units will benefit from access to shared amenity areas and/or balconies as well as access to the canal. Added to this, the majority of apartments would be be dual aspect. The scheme is proposed as a car-free development.
- 5.3 The proposed average sales value for this scheme is [REDACTED] per sq.m) which provides a total value for the private housing of [REDACTED]
- 5.4 We note that since the previous planning application, the proposed market rates have reduced. The apparent reason for the reduction in values has been noted:

Goldschmidt & Howland have reported a softening of the local housing market over the past six months, resulting in a small price reduction per sqm since the middle of 2014.

- 5.5 We have considered both the Zoopla Zed-Index and the Land Registry House Price Index to test this statement. Goldschmidt & Howland first provided their views on value in May 2014 just under a year ago. Both indices indicate that values have risen over the intervening period Zoopla 6.2% and Land Registry 7%.
- 5.6 Looking more closely the Zoopla Zed-Index for the NW1 area shows that there has been a fall back in values but that this fall is declining. The table below shows the change in current house prices relative to the period indicated.

Time frame	% change
Last 1 year	+ 6.20%
Last 6 months	- 4.46%
Last 3 months	- 1.50%

- 5.7 Therefore whilst it is evident that as the agents indicate there has been a recent softening of the market, on balance however overall values have actually increased not decreased since the time of their last report in May 2014. Consequently we see no reason why the values proposed should now be less than May last year.
- 5.8 We have summarised our views on unit values and our research is set out in Appendix 1.

One Bed Units

- 5.9 The proposed market values for the one-bed units range between [redacted] and [redacted] ([redacted] sq.ft - [redacted] sq.ft) [redacted] -£[redacted] sq m.
- 5.10 There is limited evidence of recent sales of build 1 bed units. We have therefore considered asking prices for new build properties which average at £970 sq.ft (£10,446 sq.m). Second hand units show an average of £862 sq.ft (£9,240 sq.m).
- 5.11 Based on our assessment we think it possible that the upper end of the price range for these units could be in the order of [redacted]q.m.

Two Bed Units

- 5.12 The proposed market values for the two bed units range between [redacted] and [redacted] ([redacted] sq.ft - [redacted] sq.ft) £[redacted] sq m - [redacted] sq m.
- 5.13 We note a small error in the rate per sq.ft for unit 6.2 within the applicants pricing schedule (states [redacted] sq.ft rather than [redacted] sq.ft), however, this does not significantly affect the overall result.
- 5.14 Based on our market evidence, we view the upper end of the price range as being [redacted] sq.m.

Three Bed Units

- 5.15 The 3-bed flats range from [redacted] - £[redacted] ([redacted] - £[redacted] sq.ft) [redacted] sq m - [redacted]sq m. Our market evidence suggests that these values are reasonable.

Summary

- 5.16 The proposed ground rents show an average of £■■■■ per private unit capitalised with a ■■■■ yield to provide a sum of ■■■■. We accept these are reasonable assumptions.
- 5.17 We are of the view that the downward adjustments to proposed sales values has been excessive in light of the overall upwards movement in prices since the last submission, despite the apparent set back to prices of recent months. This has the effect of under valuing the proposed units.

6.0 AFFORDABLE HOUSING VALUES

- 6.1 The affordable housing values total ■■■■ for the 12 proposed units. An offer letter dated 2 December 2014 from Circle Housing supports this. We note that within the documentation for the previous planning application, the planning statement noted that the Council sought *the housing tenure split to be closer 60:40 social rented intermediate*. The proposed tenure split is 50:50.
- 6.2 We accept that this offer validates the affordable housing values applied in the appraisal although it would be helpful to have assumptions on proposed rents and shared ownership values made clearer in order that the Council can formulate a more informed view about the general affordability of the products proposed..

7.0 COMMERCIAL SPACE

- 7.1 Local agents Ereira Mendoza have estimated the value of the proposed commercial space. They are based on an estimated rental value of ■■■■ sq.ft for the ground floor and ■■■■ sq.ft for the lower ground floor. This is then capitalised at a yield of ■■■■ to provide a capital value of ■■■■.
- 7.2 On request, we have had sight of the market evidence in the form of recent lettings and current stock availability. Achieved rental information ranges from ■■■■ sq.ft to ■■■■ sq.ft and currently available units range from ■■■■ sq.ft to ■■■■ sq.ft.
- 7.3 We note a recent deal on 128 Albert Street, NW1 7NE. In September 2014 the building was let for ■■■■ sq.ft. This office has been fully refurbished and has car parking facilities.
- 7.4 There is limited comparable evidence of new-build offices in the vicinity of the subject site, thus we have focused on local available stock:

1 Harrington Street

Unique new build, which is currently under construction with a courtyard and high ceilings. The quoted rent is £480 sq.m / £45.00 sq.ft inclusive of service charge.

Fitzroy House, 355 Euston Road

Newly refurbished Grade A office space with roof terraces and basement car parking space. This unit is advertised for £595 sq.m / £55 sq.ft.

Kentish Town Road

This unit is advertised for £45,000 p.a. (£365.97 sq.m / £34 sq.ft). The unit represents is high quality second-hand office space.

Centro (3) 19 Mandela Street

This is a fourth floor office with an asking rent of £121,500 per annum (£538.20 sq.m / £50.00 sq.ft). This unit has the benefit of an on-site café and gym.

7.5 Based on our market evidence, we are of the view that the proposed commercial rental value appears reasonable and within the likely range of achievable values.

8.0 BUILD COSTS

8.1 The base build costs for this scheme are █████ sq.m (█████ sq.ft). A detailed cost plan has been prepared by BTP which has been analysed by our retained Cost Consultant Neil Powling (see appendix 2 for full cost report).

8.2 Neil summarises:

The benchmarking of the three categories of residential space and the commercial space is satisfactory for all four categories, and we are therefore satisfied that the estimated costs are reasonable.

We recommend that the rights of light and exceptional costs are verified.

8.3 The developer's return for market housing is 18.9% on gross development value (GDV) which is stated as being below the generally accepted threshold of 20%. The affordable housing profit allowance is 4% which is less than the 6% figure we would generally expect. Both profit target of 20% and 4% appear reasonable and in line with current market evidence.

8.4 We have reviewed other scheme costs and fees and accept that the following are reasonable:

- Professional fees of 12%
- Finance interest rate 7%
- Marketing fees of 3%
- Construction period of 2 years.

Appendix 1

One Beds

New Builds Advertised Prices

Unit	Advertised Price	Size	£ per sq.ft / sq.m	Additional information
Oval Road, NW1	£550,000	515 sq.ft / 47.8 sq.m	£1,068 sq.ft / £11,497 sq.m	Private balcony and security surveillance
Arlington Road, NW1	£595,000	667 sq.ft / 61.9 sq.m	£892.05 sq.ft / £9,612 sq.m	First floor unit
Prince of Wales Road, NW5	£439,950	463 sq.ft / 43 sq.m	£950 sq.ft / £10,229 sq.m	Third floor unit

Second Hand Sold Prices

Unit	Sold Price (+HPI)	Size	£ per sq.ft / sq.m	Additional information
Flat 2 47 Kings Terrace, NW1	£455,000	556 sq.ft / 51.54 sq.m	£818 sq.ft / £8,828 sq.m	Very good finish. Second floor apartment
77A Patshull Road, NW5	£595,000	656.60 sq.ft / 61 sq.m	£906 sq.ft / £9,754 sq.m	Period conversion with communal gardens
Flat C Wilmot Place, NW1	£484,350	566 sq.ft / 53 sq.m	£856 sq.ft / £9,139 sq.m	Top floor flat of semi-detached house. Refurbished unit with private section of rear garden

Two Beds

Advertised prices

Unit	Advertised Price	Size	£ per sq.ft / sq.m	Additional information
Prince of Wales Road, NW5	£800,000	852 sq.ft / 78 sq.m	£938.97 sq.ft / £10,256 sq.m	180-degree views. New Build development
Camden Road, NW1	£1,285,000	1,050 sq.ft / 97.6 sq.m	£1,223.81 sq.ft / £13,166 sq.m	Renovated apartment finished to a high specification. Has private roof terrace
Regents Canalside, NW1	£1,050,000	884 sq.ft / 82 sq.m	£1,188 sq.ft / £12,805 sq.m	Dual aspect apartment with dual aspect views. Canal views but no parking. Second hand unit

Sold prices

Unit	Sold Price (+ HPI)	Size	£ per sq.ft / sq.m	Additional information
Flat 36, 37 Camden Road, NW1	£875,000	735 sq.ft / 68.28 sq.m	£1,190 sq.ft / £12,815 sq.m	Built in 2013. Riverside location
Flat 1, 37 Camden Road, NW1	£1,101,968	884 sq.ft / 82.13 sq.m	£1,247 sq.ft / £13,417 sq.m	Built in 2013. Fifth floor apartment with balcony
37A Greenland Road, NW1	£662,250	700 sq.ft / 65 sq.m	£946.07 sq.ft / £10,188 sq.m	Ground floor garden maisonette
Flat 7 Barnes House, NW1	£541,330	635 sq.ft / 59 sq.m	£853 sq.ft / £10,010 sq.m	Located above retail unit
Flat 1 Carpenter Court, NW1	£696,250	914.9 sq.ft / 85 sq.m	£761.01 sq.ft / £8,191.2 sq.m	Second hand sale - with balcony
Flat 3 1 Parkway, NW1	£690,000	697 sq.ft / 64.8 sq.m	£990 sq.ft / £10,648 sq.m	Refurbished in 2013
Flat 7 Hawley Road, NW1	£585,000	570.49 sq.ft / 53 sq.m	1,025 sq.ft / 11,037 sq.m	Refurbishment of a public house into high quality residential units

Three bed

Second hand advertised prices

Unit	Advertised Price	Size	£ per sq.ft / sq.m	Additional information
Haverstock Hill, NW3	£1,000,000	900 sq.ft / 83.61 sq.m	£1,111 sq.ft / £11,960 sq.m	Private entrance and patio garden. Second hand sale
Darwin Court, NW1	£995,000	1,150 sq.ft / 107 sq.m	£865 sq.ft / £9,313 sq.m	With 1 parking space

Second hand sold prices

Unit	Sold Price (+ HPI)	Size	£ per sq.ft / sq.m	Additional information
18 Hampstead Gardens, NW5	£845,158	942 sq.ft / 87.5 sq.m	£897 sq.ft / £9,659 sq.m	With a balcony and secure underground parking
Flat 9 78 Adelaide Road, NW3	£1,118,499	1,117 sq.ft / 104 sq.m	£1,001 sq.ft / £10,786 sq.m	Modern apartment on top floor. No parking
Flat 1 73 Plender Street, NW1	£730,919	1,109 sq.ft / 103 sq.m	£659 sq.ft / £7,096 sq.m	Recently converted Victorian pub with balcony

Appendix 2

Cost Report

Project: 140-146 Camden Street NW1 9PF

2014/7908/P

1 SUMMARY

- 1.1 The benchmarking of the three categories of residential space and the commercial space is satisfactory for all four categories, and we are therefore satisfied that the estimated costs are reasonable.
- 1.2 We note that the toolkit includes [REDACTED] exceptional costs. We have not seen any supporting information for this amount.
- 1.3 The toolkit also includes abnormal costs of [REDACTED] and external works of [REDACTED] - these amounts are taken from the BTP estimate with the addition of 16% apparently to cover professional fees.
- 1.4 With regard to the EUV we note that the AHS refers to the EUV in the Allsopp report of [REDACTED]M following a full refurbishment of the building. The Allsopp report does state that the current condition of the property warrants a new roof in part and modernisation throughout. There is no information on the calculations undertaken by Allsopp in accounting for the refurbishment cost in arriving at their valuation. Our calculation of the refurbishment cost of the existing building using BCIS mean average data without any allowance for abnormal costs is [REDACTED].

2 METHODOLOGY

- 2.1 The objective of the review of the construction cost element of the assessment of economic viability is to benchmark the applicant costs against RICS Building Cost Information Service (BCIS) average costs. We use BCIS costs for benchmarking because it is a national and independent database. Many companies prefer to benchmark against their own data which they often treat as confidential. Whilst this is understandable as an internal exercise, in our view it is insufficiently robust as a tool for assessing viability compared to benchmarking against BCIS.
- 2.2 BCIS average costs are provided at mean, median and upper quartile rates (as well as lowest, lower quartile and highest rates). We generally use mean or upper quartile for benchmarking depending on the quality of the scheme. BCIS also provide a location factor compared to a UK mean of 100; our benchmarking exercise adjusts for the location of the scheme. BCIS Average cost information is available on a default basis which includes all historic data with a weighting for the most recent, or for a selected maximum period ranging from 5 to 40 years. We generally consider both default and maximum 5 year average prices; the latter are more likely to reflect current regulations, specification, technology and market requirements.
- 2.3 BCIS average prices are also available on an overall £ per sqm and for new build work (but not for rehabilitation/ conversion) on an elemental £ per sqm basis. We generally consider both. A comparison of the applicants elemental costing compared to BCIS elemental benchmark costs provides a useful insight into any

differences in cost. For example: planning and site location requirements may result in a higher than normal cost of external wall and window elements.

- 2.4 If the application scheme is for the conversion, rehabilitation or refurbishment of an existing building, greater difficulty results in checking that the costs are reasonable, and the benchmarking exercise must be undertaken with caution. The elemental split is not available from the BCIS database for rehabilitation work; the new build split may be used instead as a check for some, but certainly not all, elements. Works to existing buildings vary greatly from one building project to the next. Verification of costs is helped greatly if the cost plan is itemised in reasonable detail thus describing the content and extent of works proposed.
- 2.5 BCIS costs are available on a quarterly basis - the most recent quarters use forecast figures, the older quarters are firm. If any estimates require adjustment on a time basis we use the BCIS all-in Tender Price Index (TPI).
- 2.6 BCIS average costs are available for different categories of buildings such as flats, houses, offices, shops, hotels, schools etc. The Applicant's cost plan should keep the estimates for different categories separate to assist more accurate benchmarking.
- 2.7 To undertake the benchmarking we require a cost plan prepared by the applicant; for preference in reasonable detail. Ideally the cost plan should be prepared in BCIS elements. We usually have to undertake some degree of analysis and rearrangement before the applicant's elemental costs can be compared to BCIS elemental benchmark figures. If a further level of detail is available showing the build-up to the elemental totals it facilitates the review of specification and cost allowances in determining adjustments to benchmark levels. An example might be fittings that show an allowance for kitchen fittings, bedroom wardrobes etc that is in excess of a normal benchmark allowance.
- 2.8 To assist in reviewing the estimate we require drawings and (if available) specifications. Also any other reports that may have a bearing on the costs. These are often listed as having being used in the preparation of the estimate. If not provided we frequently download additional material from the documents made available on the planning website.
- 2.9 BCIS average prices per sqm include overheads and profit (OHP) and preliminaries costs. BCIS elemental costs do not include these. Nor do elemental costs include for external services and external works costs. Demolitions and site preparation are excluded from all BCIS costs. We consider the Applicants detailed cost plan to determine what, if any, abnormal and other costs can properly be considered as reasonable. We prepare an adjusted benchmark figure allowing for any costs which we consider can reasonably be taken into account before reaching a conclusion on the applicant's cost estimate.

3 GENERAL REVIEW

- 3.1 We have been provided with and relied upon the Affordable Housing Statement (AHS) prepared by Douglas Birt Consulting dated February 2015 and in particular Appendix 3 Preliminary Budget Estimate Nr 5 dated February 2015 prepared by the Barrie Tankel Partnership (BTP). The estimate is in the total amount of [REDACTED]

- 3.2 We have also downloaded a number of documents published on the planning web site including both demolition and Architect's drawings, the Basement Impact Assessment, the Construction Management Plan, the Architects Schedule of Accommodation and the Services Strategy.
- 3.3 The estimate is in reasonable detail that has facilitated the preparation of an elemental analysis with the different functional categories of flats and offices separately identified. The rates are at 1Q2014 price levels and a 5% addition made to update the estimate to 4Q2014. The BCIS TPI for 1Q2014 was 246 and the forecast figures for 4Q2014 and 1Q2015 are 255 and 257 respectively. The uplift to 4Q2014 is therefore 3.66% and to 1Q2015 (the date of current data used for benchmarking) 4.47%. This small difference has been subsumed into our adjusted benchmarking exercise.
- 3.4 The private apartments, intermediate units and commercial space are all within blocks of the building that are 6 storeys or more. The social rented is in a 5 storey block, but we consider it reasonable to use 6+ storey BCIS average data for benchmarking as for the other functional areas, as they are all part of a single building. However to determine the effect of this decision we have also benchmarked as a 3-5 building that results in a difference of £144/m² or £85,000.
- 3.5 We have downloaded current BCIS data for benchmarking including the location factor for Camden of 118 and have applied this factor in our calculations.
- 3.6 Our analysis extracts data from the cost plan and splits the estimate into six sections: private flats, intermediate/ shared flats, social rented flats, commercial space, external works and abnormal costs. The latter two sections have been excluded from the benchmarking exercise as both are considered as abnormal for the purposes of benchmarking - see also 3.9 below.
- 3.7 The benchmarking of the three categories of residential space and the commercial space is satisfactory for all four sections, and we are therefore satisfied that the estimated costs are reasonable.
- 3.8 We note that the toolkit includes [REDACTED] exceptional costs. We have not seen any supporting information for this amount.
- 3.9 The toolkit also includes abnormal costs of [REDACTED] (the estimate total of [REDACTED]). The [REDACTED] % addition we assume to cover professional fees.
- 3.10 With regard to the EUV we note that the AHS refers to the EUV in the Allsopp report of [REDACTED] following a full refurbishment of the building. The Allsopp report does state that the current condition of the property warrants a new roof in part and modernisation throughout. There is no information on the calculations undertaken by Allsopp in accounting for the refurbishment cost in arriving at their valuation. Our calculation of the refurbishment cost of the existing building using BCIS mean average data without any allowance for abnormal costs is [REDACTED].

BPS Chartered Surveyors

Date: 5th March 2015

140-146 Camden Street NW1 9PF
BCIS downloaded 5th March 2015

LB of Camden

treat all as 6+ storey as all part of same building

Location Camden	118	
Base pricing 1Q2014 - TPI	246	<i>Inc from 1Q2014</i>
Updated to 4Q2014 - TPI	255 forecast	3.66% BTP have calculated at 5%
Current 1Q2015 - TPI	257 forecast	4.47%

Office allows for cooling - treat as a/c building for benchmarking

Avg prices def	LF100	LF118	Sample
Office generally - mean	1,390	1,640	189
Office a/c 6+ storey	1,927	2,274	8
Flats generally - mean	1,150	1,357	794
Flats 3-5 storey - mean	1,134	1,338	527
Flats 6+ storey - mean	1,430	1,687	70
Flats generally - UQ	1,303	1,538	794
Flats 6+ storey - UQ	1,580	1,864	70
Offices refurb - generally - mean	782	923	105
Avg prices max 5 years			
Office generally - mean	1,566	1,848	11
Flats generally - mean	1,210	1,428	250
Flats 3-5 storey - mean	1,191	1,405	162
Flats 6+ storey - mean	1,444	1,704	38
Flats generally - UQ	1,383	1,632	250
Flats 6+ storey - UQ	1,531	1,807	38

Elemental analysis & BCIS Benchmarking

	GIA m ²	£
		TOTAL
Demolitions		290,620
1 Substructure		2,002,435
2A Frame		502,350
2B Upper Floors		927,160
2C Roof		744,500
2D Stairs		497,900
2E External Walls		1,269,050
2F Windows & External Doors		1,095,980
2G Internal Walls & Partitions		431,340
2H Internal Doors		218,250
2 Superstructure		5,686,530
3A Wall Finishes		502,746
3B Floor Finishes		486,915
3C Ceiling Finishes		386,778
3 Internal Finishes		1,376,439
4 Fittings		526,500
5A Sanitary Appliances		282,600
5B Services Equipment (kitchen, laundry)		
5C Disposal Installations		
5D Water Installations		906,000
5E Heat Source		
5F Space Heating & Air Treatment		459,800
5G Ventilating Systems		
5H Electrical Installations (power, lighting, emergency lighting)		1,074,167
5I Gas Installations		
5J Lift Installations		200,000
5K Protective Installations (fire fighting, sprinklers, lightning protection)		424,140
5L Communication Installations (burglar, panic alarm, fire alarm, cctv, door entry, public address, data cabling, tv/satellite)		
5M Special Installations - (window cleaning, BMS, medical gas)		
5N BWIC with Services		172,000
5O Builders Profit % Attendance on Services		
CFSH & BREEAM		100,000
5 Services		3,618,707
6A Site Works		402,205
6B Drainage		216,380
6C External Services		255,000
6D Minor Building Works		
SUB TOTAL		13,501,231
6 External Works		873,585
SUB TOTAL		14,374,816
7 Preliminaries		3,018,711
Overheads & Profit		
SUB TOTAL		17,393,527
Price & Design Risk		
Contingencies		718,741
Grand Total (Exc VAT) - 1Q2014 + 5% to 4Q2014		18,112,268
Add 5% 1Q2014 to 4Q2014		19,017,881
Benchmarking - UQ rates - current 1Q2015		
Add or Ddt substructure		
Add demolitions		
Add external works		
Add additional cost of upper floors		
Add additional cost of roof		
Add additional cost of external walls		
Add additional cost of windows & ext doors		
Add additional cost of wall finishes		
Add additional cost of floor finishes		
Add additional cost of ceiling finishes		
Add additional cost of fittings		
Add additional cost of sanitary fittings		
Add additional cost of lift installations		
Add preliminaries & OHP		21.0%
Add 1Q2014 to 1Q2015		4.5%
Add contingency		5.0%
TOTAL adjusted benchmark		

140 - 146 Camden Street, NW1 9PF

Independent Review of Assessment of Viability

ADDENDUM REPORT

14 May 2015



1.0 INTRODUCTION

- 1.1 This Addendum Report is supplemental to our 9 March 2015 Review of Financial Viability in respect of an updated viability report concerning the proposed residential development at 140 - 146 Camden Street. We had previously reported on this scheme in our report of 30 September 2014.
- 1.2 The applicants viability report prepared by Douglas Birt Consulting (February 2015) sought to demonstrate that the proposed scheme could not viably deliver more than 24% affordable units. We note that this is substantially lower than the Council's policy target level as demonstrated within Policy DP3 of the Local Development Framework (adopted version 2010).
- 1.3 Our March report outlined reasons as to why we had significant concerns regarding the apparent viability of these proposals as set out below:

Existing Use Value

1. We did not accept that the proposed refurbishment of the existing office and industrial space could achieve Grade A quality due to the absence of natural light affecting a significant element of floorspace.
2. We took the view the proposed refurbishment costs were understated
3. The residual valuation of refurbished offices did not adequately reflect the impact of the extended programme before the offices were income producing when computing the existing use value. This had the effect of overstating the EUV.
4. We also questioned the level of rents proposed for the refurbished space
5. We questioned the applicability of a 20% landowner premium.

The Proposed Scheme

6. We were of the view that whilst residential values have fallen back too great a discount had been applied to the proposed residential values

which had previously been agreed in our report of 30 September 2014 and that the proposed unit values were not reflective sales evidence.

1.4 We subsequently received an email from the applicants consultants dated 9th April which provided:

- A cost plan for the EUV scheme office refurbishment
- Further justification for the valuation approach adopted in calculating the EUV scheme
- Further justification for the proposed residential unit values.

1.5 Following analysis of this information and a meeting with the Council and the applicants we provided the applicants with a detailed written explanation amplifying our remaining concerns, which included:

Existing use Value:

- We again highlighted our view that the refurbished office space could not physically achieve Grade A quality. We provided further comparable office rental information and concluded the proposed rents of £42.50 sq.ft and £28.33 respectively were excessive
- We proposed an approach to determining the office space which would be unaffected by issues of natural light and window access as a basis from which to determine an appropriate rental value for the building.
- We provided detailed working appraisals to demonstrate our view on the correct methodology for computing the EUV to reflect the extended development programme.

The proposed scheme:

- We provided further analysis regarding our view that the proposed residential unit values were low.

1.6 Allsop, has been advising Douglas Birt regarding the existing use value and has subsequently provided us with an additional note dated 8th May. This note includes an existing use value cash flow valuation and further discussion of the appropriate office rental values. Please note that we have set out our analysis to this note in appendix 1. In summary we maintain our objections to the approach taken by Allsop.

1.7 This addendum reports our conclusions and recommendations based on all additional information received from Douglas Birt Consulting and their advisors since our report of 14 May 2015.

2.0 CONCLUSIONS AND RECOMMENDATIONS

2.1 On the basis of the supplemental information provided by the applicant's consultants along with our additional analysis, we are now satisfied that the proposed scheme cannot provide further affordable housing contributions while remaining economically viable.

2.2 We maintain our view that the applicant has not adequately reflected the impact of the extended development programme attached to refurbishing the property as part of the EUV calculation.

2.3 In part the length of programme is determined by the length of the current occupier's unexpired lease. This factor affects both the existing use value and the proposed scheme. We have therefore sought to apply a similar cashflow based analysis to the proposed scheme as we have to the EUV to ensure a consistency of approach. This analysis reveals that even though we have arrived at a significantly lower EUV than the applicant we also calculate a significantly lower proposed scheme residual value which when compared to our revised benchmark shows a marginal deficit.

2.4 We do acknowledge that in the current market environment there is a measure of uncertainty regarding the direction of market values. Our difference in views on the residential values for the proposed scheme is relatively marginal at £150,000 and has been applied to our appraisals in arriving at our conclusions concerning viability. Given the uncertainties regarding residential values and the lengthy construction programme we recommend inclusion of an outturn review mechanism to ensure the contributions from the scheme remains maximised.

3.0 VIABILITY BENCHMARK

Office Values

- 3.1 Although Allsop have provided further justification for the proposed office rental values, we are still not in agreement. We have calculated the annual rental value in line with the floor areas which do/do not have access to natural light (BPS April note). This method of calculation is used simply to meaningfully quantify the impact of lighting issues.
- 3.2 Allsop have sought to reflect the impact of these issues by applying a reduced rental value to lower ground floor of the existing offices. Having examined the plans we are of the view that the accommodation at this level is no different from the ground floor as such there is no logical reason why the first floor should be valued at a higher rate.

Methodology

- 3.3 We acknowledge that a standard residual valuation is usually acceptable as representing an accurate view of current development viability. It assumes current day costs and values and no account is taken of the length of development programme other than in respect of interest charges.
- 3.4 By contrast investment valuations always reflect the impact of time through applying a discount rate to reversionary income. This principle is carried forward in development appraisals through using discounted cashflow valuations to provide more accurate valuations of developments with extend programmes. Unlike residual valuations profit is not a factor of value but of the discounted values in relation to the discounted costs. Profit calculated on this basis is known as an internal rate of return (IRR).
- 3.5 We have appraised both the EUV and proposed scheme on this basis and conclude that the total EUV generates a figure circa . With a 10% premium, this figure rises to .
- 3.6 Reflecting our proposed residential values we calculated a residual value for the proposed scheme of on discounted cashflow basis. When compared to our estimated EUV it shows the scheme to be marginally in deficit.

4.0 RESIDENTIAL VALUES

- 4.1 Following our earlier report, Goldschmidt & Howland have sent additional market evidence in order to support the proposed residential values. We remain of the view that the proposed units are likely to achieve higher values than those stated in the Goldschmidt report. We do, however, appreciate that the current residential market in this area has experienced a recent marginal decline in values and future trends are uncertain.

4.2 We remain of the view that the total sales revenue should be increased by £150,000. As such, our cash flow model for the proposed scheme takes this into account.

Appendix 1

Response to Allsops note 8 May

Market Office Rental Values

Allsop's note in essence disputes our approach to identifying the quantum of space within the existing building which is deficient in natural light and access to windows and maintains that its approach to assessing a suitable rent of £42.50 per sq ft (£522 sq m) for the majority of the space and £28.33 per sq ft (£300 sq m) for the lower ground floor is consistent with local letting evidence. Allsop maintain that their proposed rent of £42.50 per sq ft (£522 sq m) reflects a discount from their view of grade A quality offices in this location which they view as capable of achieving rents in excess of £50 per sq ft (£538 sq m).

We had sought to identify the space which would not be served by proximity to a window and which would not benefit from roof light. This exercise was an attempt to quantify impact. Allsop's approach simply applies a discount to the lower ground floor. We maintain this is inconsistent as the ground floor accommodation, excepting the current warehouse space would have no greater access to windows or roof lights than the lower ground floor consequently we maintain Allsop have assumed too higher rent for the refurbished property.

We further note that the Allsop report states "regarding the building exterior we understand a new entrance will be created together with new windows throughout... we have assumed the front elevations will also be redecorated in order to create a more attractive building." In our view this is likely to require planning consent and consequently we cannot judge whether or not the applicant would be likely to receive such a consent. Any assumption regarding the grant of planning consent transforms the valuation from existing use to potentially alternative use and highlights the very extensive assumptions concerning refurbishment which underpin the applicant's valuation of the existing use value.

Allsop place considerable weight on the letting of Albert House which let for £50 sq.ft. (£538 sq m). This office is located in Camden Town whereas the subject property is located in what can at best be described as a fringe location for office use in a more residential location. We are of the view that the information concerning Albert House supports the point that even the full redevelopment of the subject scheme will not command rental levels of £50 sq.ft. (£538 sq m) This is further supported by the applicants own consultants Ereira Mendoza who value the completely redeveloped office space within the proposed scheme at £42.50 sq.ft (£522 sq m) for the ground floor area which reflects new build quality and design.

Allsop provide evidence of Centro House which is in a superior location when compared to the subject site and has been refurbished to a high standard. This unit let for £49.50. (£532 sq m). We are of the view this reinforces our point that even

with a total redevelopment of the entire property i.e. no issues concerning natural light, local rents would not deliver £50 sq ft (£538 sq m). Therefore the discount applied by Allsop of 15% to this rent to reflect the lack of natural light and windows, which is not supported by reference to any valuation basis, should show a lower rent for the refurbished space.

Although Allsop and BPS cannot reach agreement on the market rental value, we do note that the differential is relatively minor i.e. a difference of £4.50 sq.ft. (£48 sq m).

Valuation Methodology

Allsop concede that a discounted cashflow method is also an accepted method for determining value. They identify a number of issues without approach

- Omission of letting and investment sale fees. This is accepted and appropriate corrections have been made in the figures reported in this addendum.
- Allsop claim the development expenditure modelled should follow an S curve whereas we have adopted a straight-line profile. This is open to question as no expenditure profile has been provided therefore there is no reason to favour one approach over another.
- Allsop claim our use of a profit target of 20% is in excess of what would be sought from a comprehensive refurbishment.

In respect of this latter point Allsop are seeking to rely on their valuation of 2 March. This adopts a profit target based on 20% of project costs. By contrast we have adopted a 20% internal rate of return, which is simply a discounted return on costs.

The process of calculating an internal rate of return is to generate a month by month cashflow derived by deducting that month's expenditure from that month's income. The resultant cashflows are then discounted using standard formulae to a point where income equals expenditure. The discount rate which achieves this balance is the internal rate of return and in effect models a return on cost.

Therefore we fail to understand why Allsop promote a 20% return on cost and yet dispute an IRR of 20% in this instance. We can only conclude that there is either a failure to understand the workings of cashflow analysis or that Allsop have radically changed their views on an appropriate level of return simply because it is being discounted over time. In either view we disagree with their conclusions as being inconsistent.

For valuations of building developments which span over short or average periods of time with immediate vacant possession we accept that residual valuations are

generally accepted. However residual valuations do not take into account the impact of time on the value of money other than in the calculation of bank interest charges. In this instance, we are of the view that given the period before vacant possession is obtained, the lengthy refurbishment period, the assumed void period and rent free period under a new letting is such that in combination reliance on a residual valuation fails to adequately reflect the impact of time on the current value of money.

An IRR calculation is an industry standard valuation method for valuing developments to reflect the impact of time. The RICS defines the Internal Rate of Return as

“the rate of interest (expressed as a percentage) at which all future cash flows (positive and negative) must be discounted in order that the net present value of those cash flows, including the initial investment, should be equal to zero. It is found by trial and error by applying present values at different rates of interest in turn to the net cash flow. It is sometimes called the discounted cash flow rate of return...”

We have created a simple example to demonstrate this below.

	Year						
Period	1	2	3	4	5	Sum	Profit on Cost
Income	100	0	300	300	300	1000	
Expenditure	0	750	50	0	0	800	
Net Cash Flow	100	-750	250	300	300	200	25%
						IRR	16%

The example above shows that a simple profit on cost calculation produces a figure of 25%, however, an IRR calculation which takes into account the 5 year valuation period and the timing of cash flows shows that the IRR profit calculation is in fact lower at 16%. The apparent disparity between the two figures reflects the impact of time erosion on the value of the profit return. Had the above cashflow been completed in period 1 both the IRR and profit on cost rates would be identical. Consequently we cannot see why if Allsop accept the principle of discounting there would need to be change in profit target as this is inconsistent with the principle of discounting.

Putting this point another way it is possible to have two projects both generating costs of £800 and returns of £200. Project a) is completed within 1 year and generates a 25% return on expenditure project b) generates the same cash profit but over 5 years. An IRR would compensate for the additional time involved in project b) to reflect a lower profit margin of 16% reflecting the additional time required to generate the profit. It is therefore clearly inconsistent to adjust the target profit margin to equate to the same cash sum which is in effect what Allsop advocate.

Allsops valuation does not provide an explanation of the rental values inputted and the total costs of do not seem to correspond with the previously submitted refurbishment cost information.

Purpose of the valuation

We have used the cashflow adopting the Allsop profit target to generate a residual site value. By contrast Allsop have reduced their profit target and adopted a fixed land value.

The point of the cashflow was to determine the value of the existing use assuming a refurbishment. It is therefore entirely inconsistent to adopt a fixed view of site value as an input to a valuation whose sole purpose is to determine site value.

The very fact that Allsop have needed to reduce their profit target underpins our conclusion that when viewed on a cashflow basis their opinion of land value is excessive and cannot be justified.

Allsop suggest that our cash flow model is crude as it fails to include an allowance for profit as fixed input. Again we view this comment as failing to understand the fundamental principles of an IRR calculation which determines profit by discounting costs and values to a zero point. Including fixed cash profit inputs simply seeks to predetermine the IRR by reference to pre-judged outcomes which the cashflow itself is seeking to determine and is therefore inappropriate

Including profit in this cash flow model to calculate IRR is simply incorrect.

We conclude that the benchmark land value is circa . With a 10% landowners premium this increases to reflecting a 20% IRR. By contrast using a fixed land value assumption Allsop adopt a land value of and an IRR of 12.02%



Application No: 2014/7908/P

**140-146 Camden Street
London
NW1 9PF**

**Scale:
1:1250
Date:
7-Jul-15**

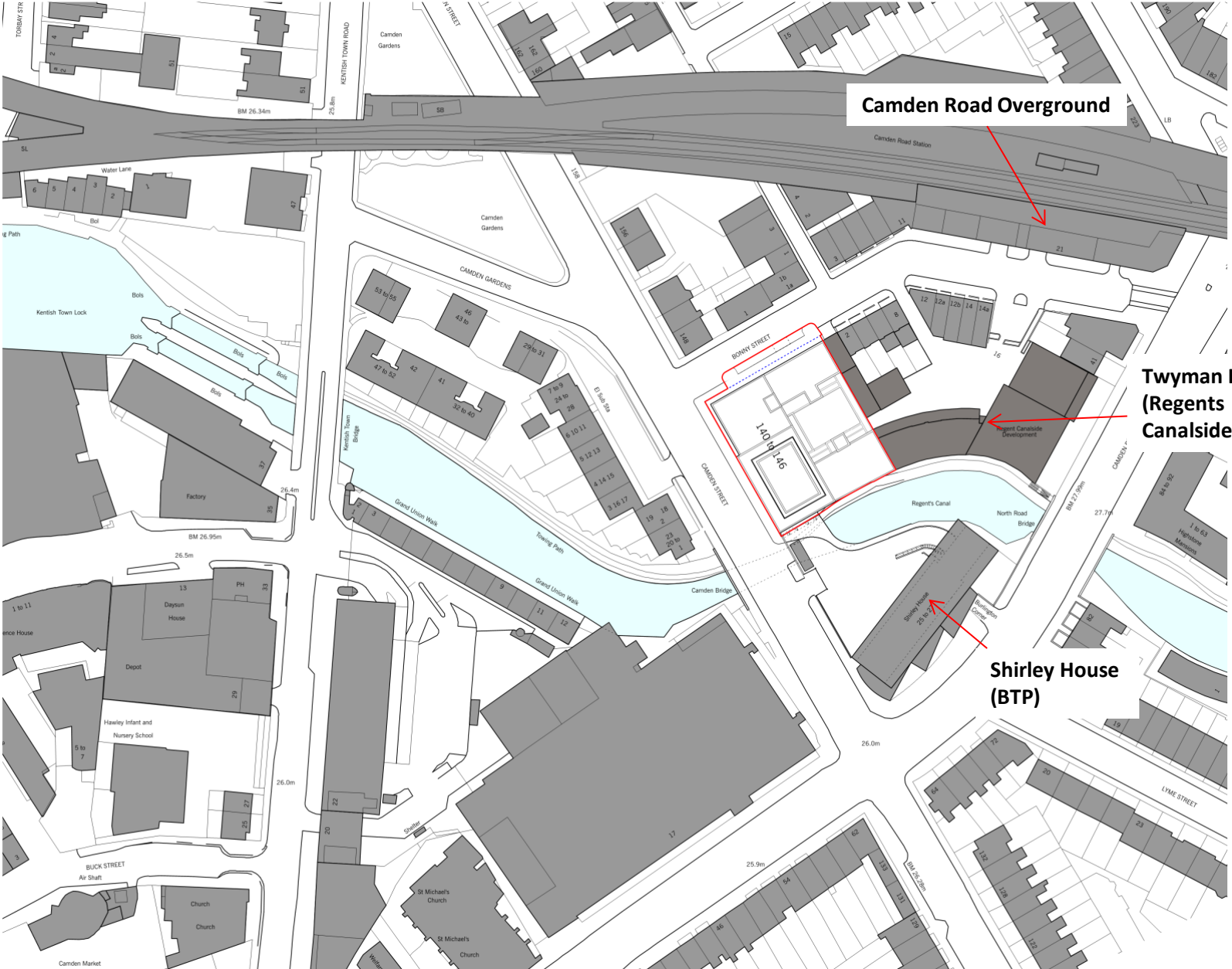


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2014/7908/P

140 – 146 Camden Street

Location Plan



Camden Road Overground

**Twyman House
(Regents
Canalside)**

**Shirley House
(BTP)**



Aerial Photo



Aerial Photo



Existing Photo

View west down Bonny Street



Existing Photo

View south down Camden St



Existing Photo

View west along Regent's Canal



Existing Photo

View north from intersection of Camden Street/Road



Existing Photo

View north along Camden Street



Existing Photo

View west from Camden Road bridge



Existing Elevation

Bonny Street



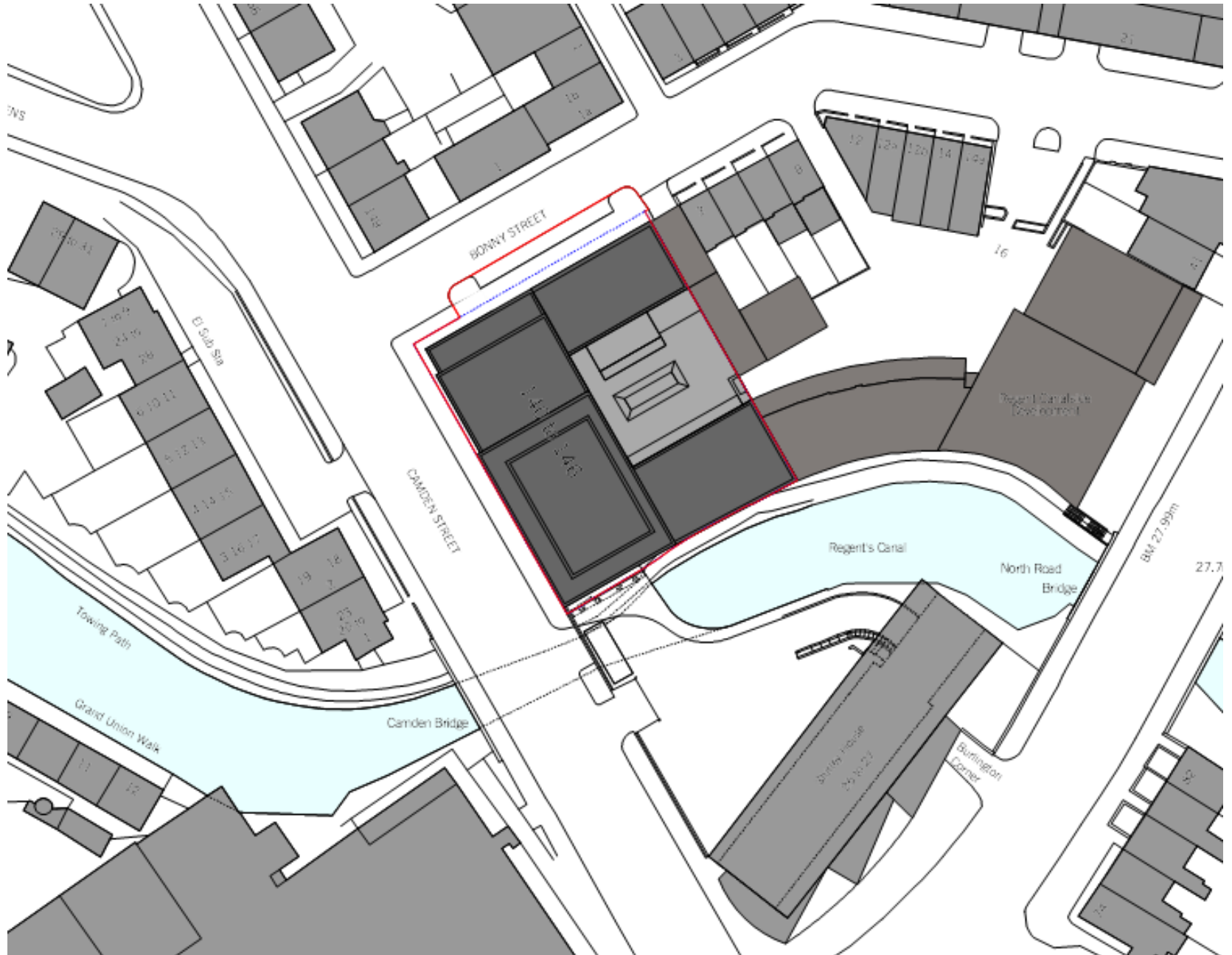
Existing Elevation

Camden Street



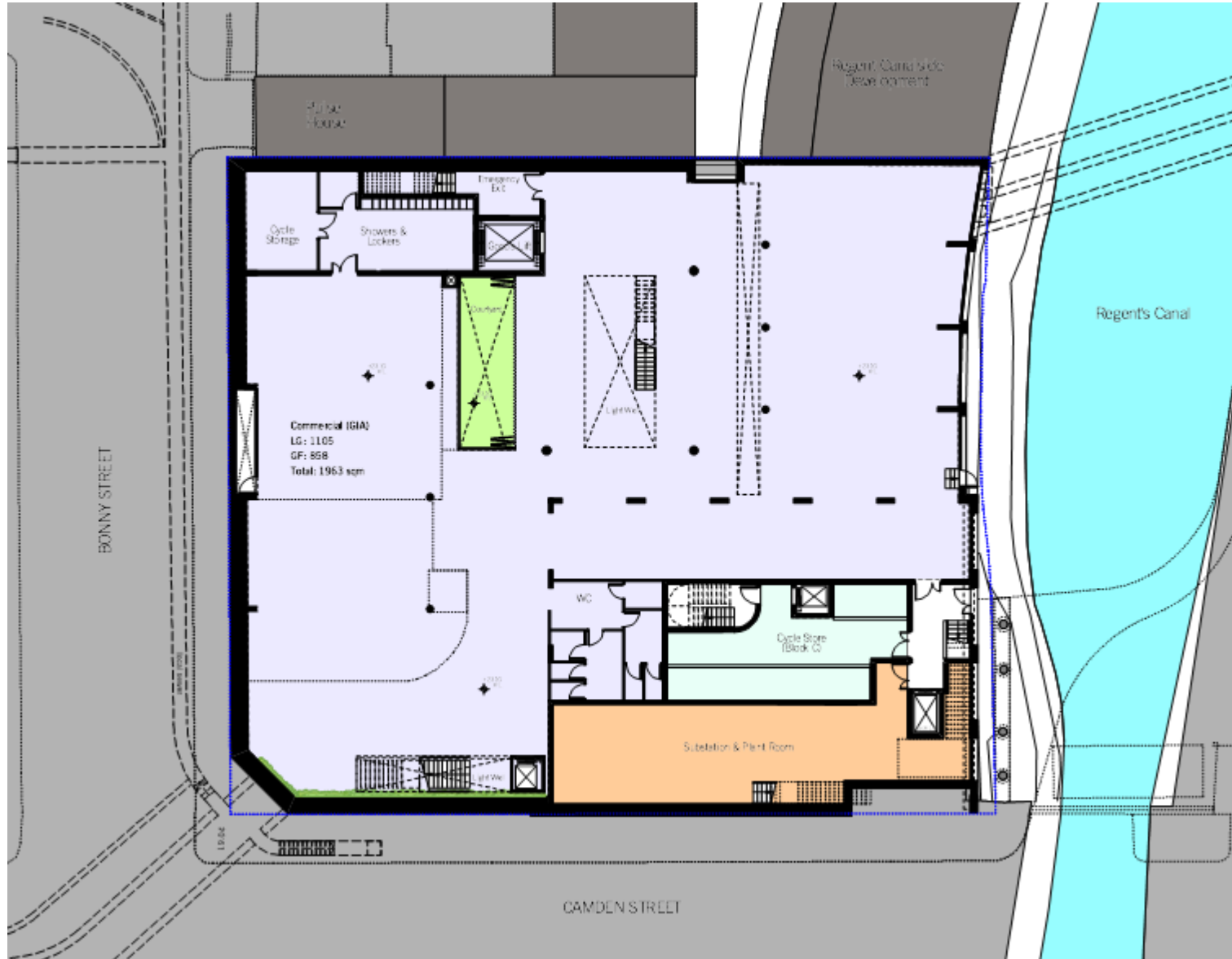
Regent's Canal

Proposed Site Plan



Proposed Floor Plan

Basement (Commercial Floorspace)



Proposed Floor Plan

Ground (Commercial/Residential)



Proposed Floor Plan

First Floor (Residential)



Proposed Floor Plan

Second Floor (Residential)



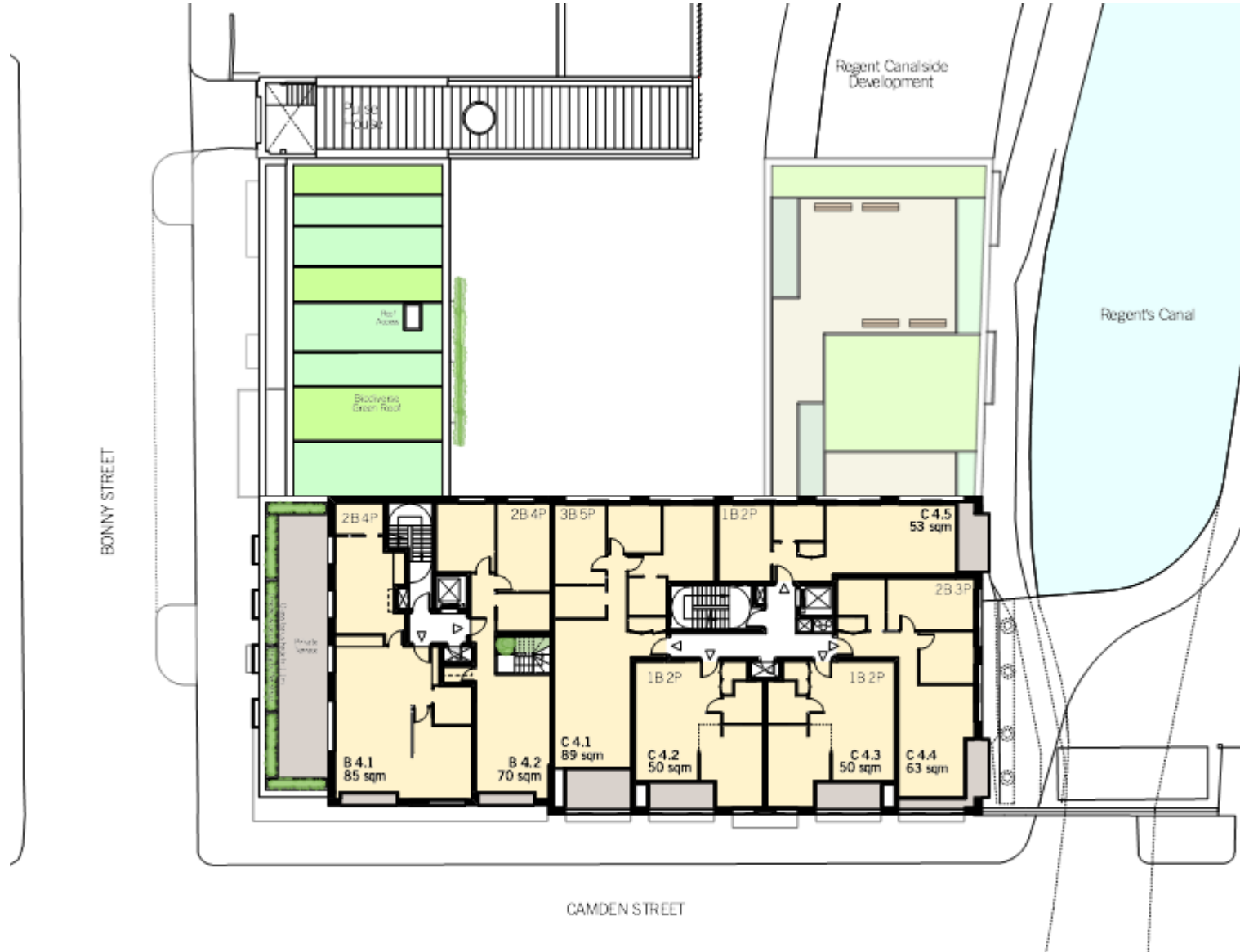
Proposed Floor Plan

Third Floor (Residential)



Proposed Floor Plan

Fourth Floor (residential)



Proposed Floor Plan

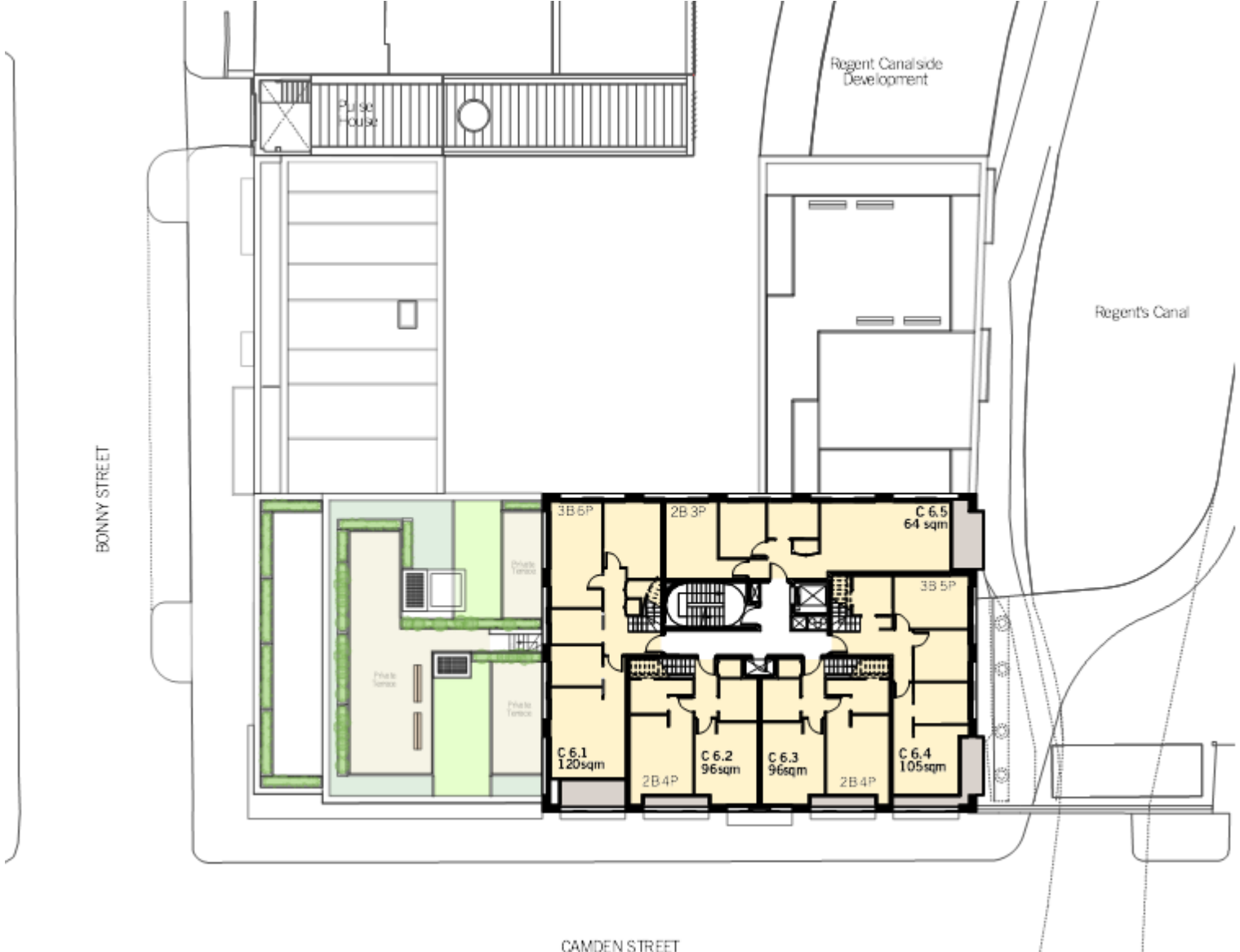
Fifth Floor (residential)



CAMDEN STREET

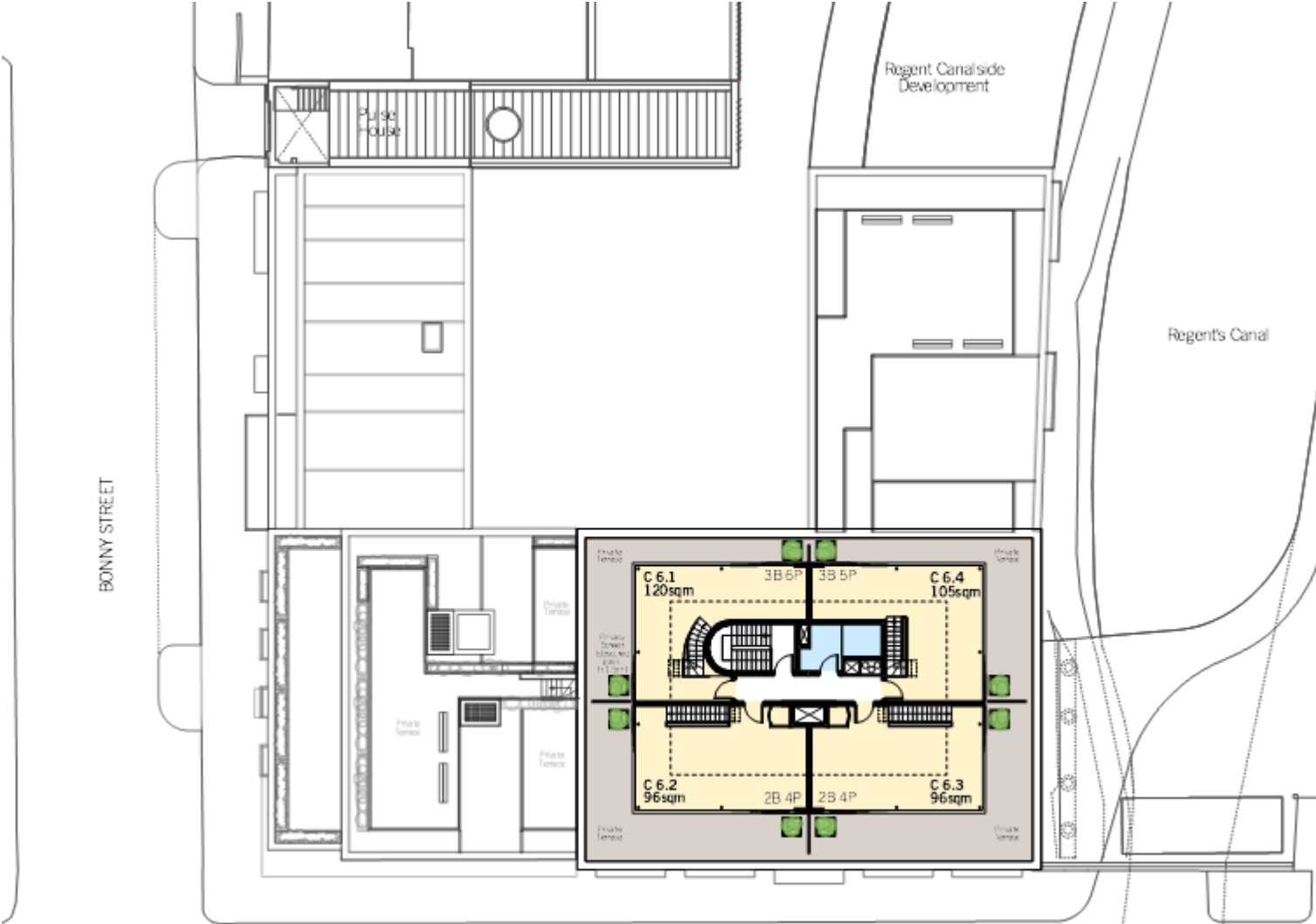
Proposed Floor Plan

Sixth Floor (residential)



Proposed Floor Plan

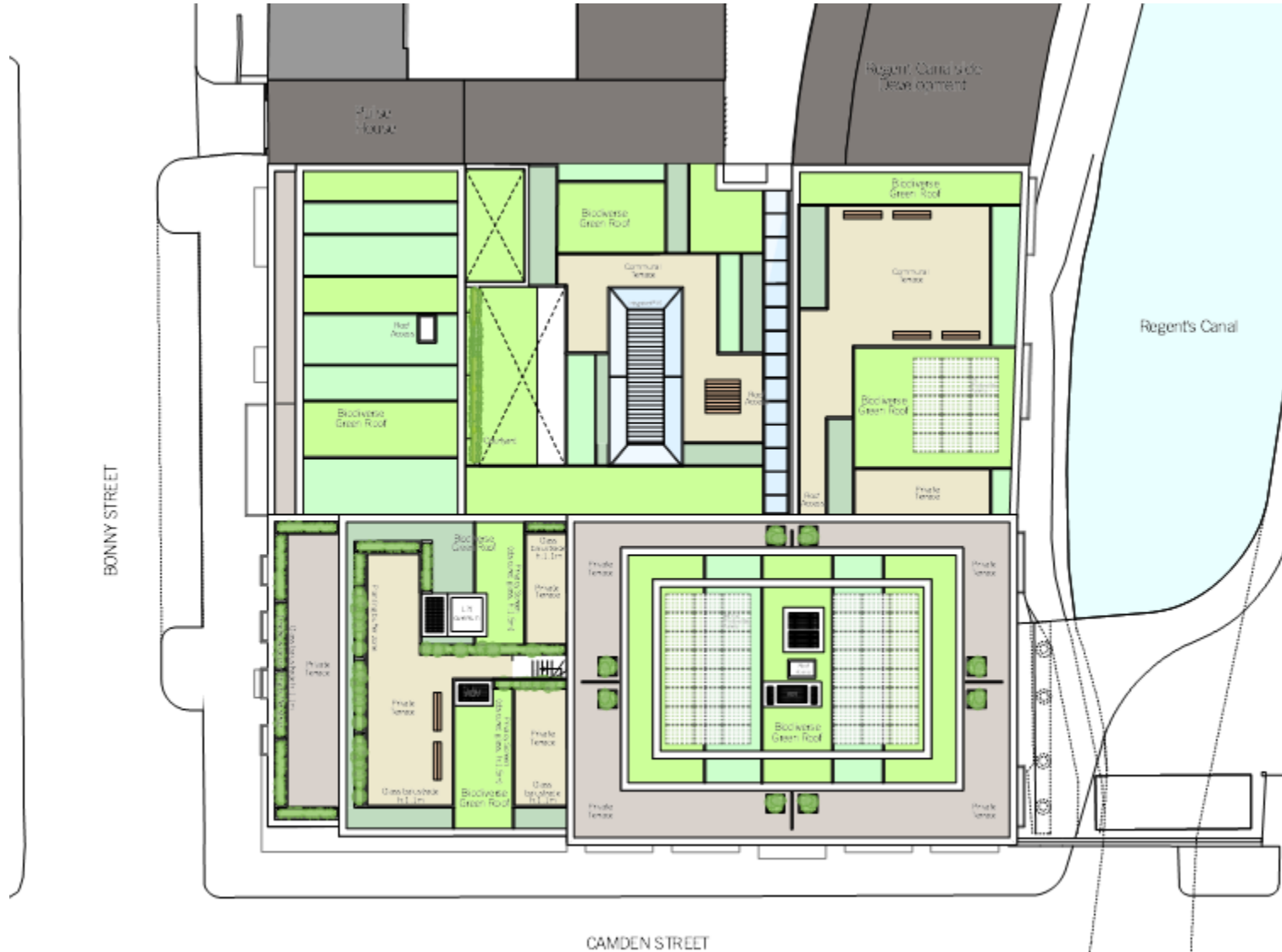
Seventh Floor (residential)



CAMDEN STREET

Proposed Floor Plan

Roof/Landscape



Proposed Elevation

Camden Street (west)



Proposed Elevation

Bonny Street (north)



Proposed Elevation

Regent's Canal (south)



Proposed Section East



Proposed Street Elevations

Camden Street & Regent's Canal



Proposed Street Elevations

East (section) & Bonny Street



Visualisation

View west down Bonny Street



Visualisation

View down Fitzjohn's Ave from north



Visualisation

View west along Regent's Canal



Visualisation

View north along Camden Street

