

Address:	44 - 44a Gloucester Avenue London NW1 8JD		1
Application Number:	2015/1243/P	Officer: Michael Cassidy	
Ward:	Camden Town with Primrose Hill		
Date Received:	12/02/2015		

Proposal: Demolition of existing buildings identified as Number 2 at the northwest corner of the site and Number 4 at the eastern corner of the site to provide a new ground plus 5 upper storey building along the north west part of the site and a ground plus 2 storey building at the eastern corner and refurbishment of existing building on site to create 40 residential units, employment floor area (Class B1a), car parking and landscaping within the courtyard with ancillary works.

Drawing Numbers

173_S_00 Rev A – Site Plan, 173_GA_10 Rev A- Location Plan, 173_DN_00 Rev A – Existing Ground Floor Plan – Demolition Drawing, 173_EE_00 Rev A - Existing Gloucester Avenue Elevation, 173_EE_01 Rev A - Existing South West Elevation, 173_EE_02 Rev A - Existing North East Elevation, 173_EE_03 Rev A - Existing Elevations, 1173_EE_04 Rev A – Existing General Elevation, 173_EX_-01 Rev A - Existing Basement Floor Plan, 173_EX_00 Rev A - Existing Ground Floor Plan, 173_EX_01 Rev A – Existing First Floor Plan, 173_EX_02 Rev A – Existing Second Floor Plan, 173_EX_02_MEZZ Rev A – Existing Second Floor Mezzanine Plan, 173_EX_ROOF Rev A – Existing Roof Plan, 173_GA_-01 Rev E – Proposed Basement Floor Plan, 173_GA_00 Rev E – Proposed Ground Floor Plan, 173_GA_01 Rev E – Proposed First Floor Plan, 173_GA_02 Rev E – Proposed Second Floor Plan, 173_GA_03 Rev D – Proposed Third Floor Plan, 173_GA_04 Rev D – Proposed Fourth Floor Plan, 173_GA_05 Rev D – Proposed Fifth Floor Plan, 173_GA_ROOF Rev A – Proposed Roof Plan, 173_GE_00 Rev A – Proposed General Elevation, 173_GE_01 Rev A – Proposed General Elevation, 173_GE_02 Rev A – Proposed General Elevation, 173_GE_03 Rev A – Proposed General Elevation – 173_GE_04 Rev A – Proposed General Elevation in Context, 173_GS_00 Rev A – Proposed General Section, 173_GS_01 Rev A - Proposed General Section, 173_GS_02 Rev A - Proposed General Section, 173_GS_03 Rev A - Proposed General Section, 173_LA_00 Rev A – Proposed Landscape Plan, 173_LFT_00 Rev A – Proposed Lifetime Home Compliance Drawing – General Arrangement, 173_LFT_01 Rev A - Proposed Lifetime Home Compliance Drawing – General Arrangement, 173_WHC_00 Rev A – Proposed Wheelchair Adaptability Drawing, 173_BS_00 Rev A – Proposed Bay Study Details, 173_BS_01 Rev A – Proposed Bay Study Details, 173_BS_02 Rev A – Proposed Bay Study Details and 173_BS_03 Rev A – Proposed Bay Study Details.

Supporting Documents

Planning Statement, Design and Access Statement plus appendices, Acoustic Report, Sustainability Statement, Heritage Statement, Ecology Report and BREEAM Report, Tree Assessment, Sunlight and Daylight Report, Basement Impact Assessment including Ground Movement Survey, Transport Assessment, Travel Plan, Construction Management Plan, Air Quality Assessment, Energy Statement and Construction Logistics Plan.

RECOMMENDATION SUMMARY:**Grant conditional planning permission subject to a section 106 Legal Agreement****Applicant:**Victoria Square Property Company Ltd
C/O Agent**Agent:**Montagu Evans LLP
5 Bolton Street
London
W1J 8BA**ANALYSIS INFORMATION****Land Use Details:**

	Use Class/Use Description	Floorspace [GIA]
Existing	B1a Light Industrial and Office	1,866.4m ²
	B8 Storage and Distribution	816m ²
	C3 Dwelling House	153m ²
Proposed	C3 Dwelling House	4,022.4m ²
	B1a Office	698m ²

Residential Use Details:

	Residential Type	No. of Bedrooms per Unit							
		Studio	1	2	3	4	5	6	7
Existing	House			1					
Proposed	House/Flat/Maisonette		12	22	6				

Parking Details:

	Parking Spaces (General)	Parking Spaces (Disabled)
Existing	20	0
Proposed	15	2

OFFICERS' REPORT

Reason for Referral to Committee: Major development involving the construction of more than 10 new dwellings or more than 1000 sq. metres of non-residential floorspace [clause 3(i)]; and which is subject to the completion of a Section 106 legal agreement for matters which the Director of Culture and Environment does not have delegated authority [clause 3(vi)].

1. SITE

- 1.1 The site (0.197 hectares) is located on Gloucester Avenue in Primrose Hill opposite 2 priority junctions, Edis Street and Princess Road. It is roughly rectangular in shape and is made up of a hard-surfaced central courtyard with 5 buildings of varying heights and design located around the edges. All of the buildings on the site have been vacant since 31st May 2013.

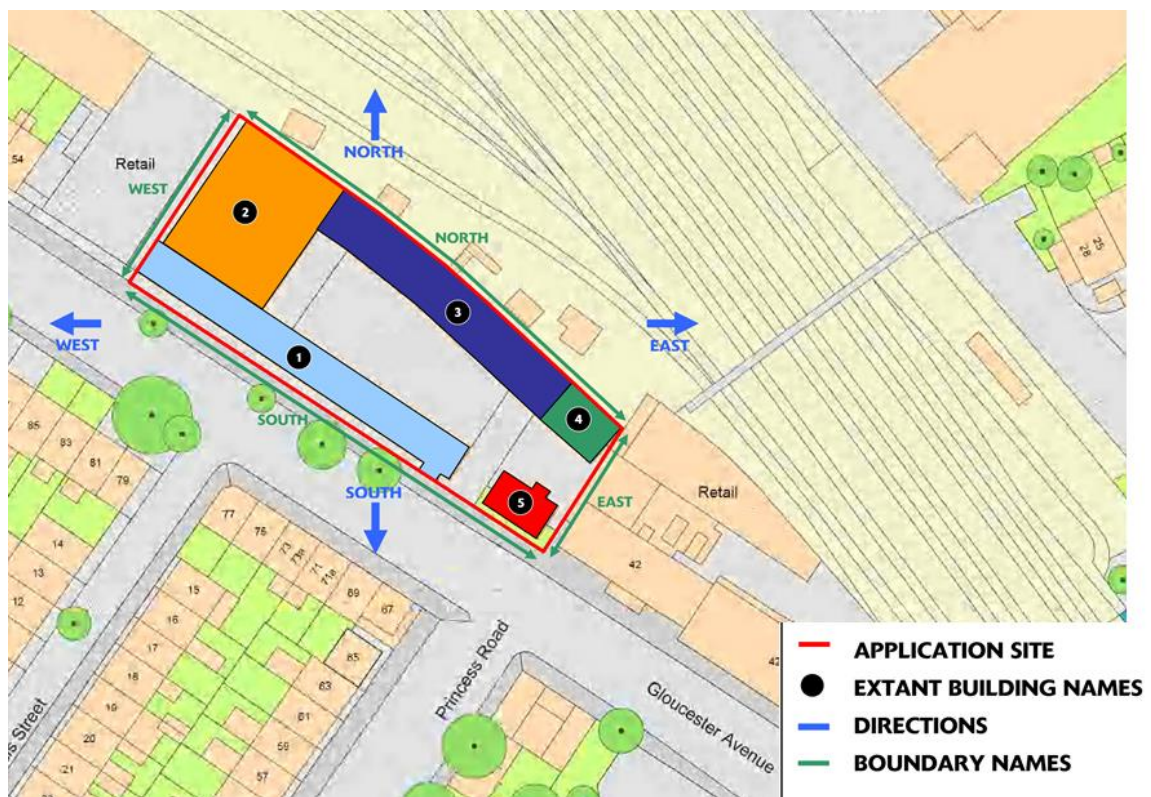


Figure 1: Site Location Plan

- 1.2 The southern side of the site along the principal Gloucester Avenue frontage is occupied by a substantial 3-storey 15-bay building (Building 1): this was constructed by the Post Office in 1870. It is the principal building on the site and the tallest building in the surrounding area. It incorporates an archway in the centre of the elevation which leads through to the courtyard to the north. Apart from this building, on the Gloucester Avenue frontage there is also a modest 2 storey 3-bay house (44a - 153sq.m of Gross Internal Area (GIA)), built in 1858 and formerly the house of a caretaker/site manager (Building 5) when the site was in use as a telegraph office. The front elevation of this building is painted white.

- 1.3 The long northern side of the site (backing onto the railway lines which serve Euston Station) is occupied by a 2 storey with basement vacant light industrial building (Building 3). The eastern end of the site is occupied by a vacant single storey building (Building 4), with the western end and north-western corner occupied by a substantial 2-storey building (Building 2) with a prominent gable-end and a ground floor canopy onto the courtyard. This building was last used for office use. All of the buildings facing the courtyard are finished in brick and were constructed by the Electric Telegraph Company (ETC) in 1858.
- 1.4 The courtyard is hard-surfaced and was used for informal parking, turning and servicing the uses within the surrounding buildings. There are 2 vehicular entrances, one through an arch in the main building; and one between the main building and the former caretaker's house leading to an informal car parking area accommodating approximately 20 vehicles.
- 1.5 Before the site was vacated, the uses consisted of a warehouse space (Class B8 storage and distribution – 816sq.m (GIA)) as well as light industrial space and office use (Class B1 (a)), generally in small suites occupied by individual businesses (1866.4sq.m (GIA)). Apart from the vacant caretakers house there are no other residential uses on the site.
- 1.6 The site appears to have been in single ownership continuously since at least the 1860's, and is similar to other large backland sites in Primrose Hill which have substantial employment use to the rear of residential terraces. North of Gloucester Avenue, these industrial sites served as a buffer between the railway cutting and the residential properties and form an important part of the character of the area as they reflect the historical pattern of development. The buildings on the site are not listed, however they are located within Primrose Hill Conservation Area (CA). Due to its high quality, good condition and significant role in representing the historic pattern of development, the site as a whole is identified as making a positive contribution to the character and appearance of the CA.
- 1.7 Abutting the site to the east is a recent mixed use office and residential development. To the south, on the opposite side of Gloucester Avenue, lies terraced residential buildings, with retail units to the ground floor. Immediately to the west, at 48 Gloucester Avenue, is a recently constructed pair of four storey town houses. An access road between the application site and No. 48 separates them. This road provides access to an area of car parking to the rear of Nos. 48 and 50. These houses were constructed pursuant to planning permission ref: PEX0200634.

2. THE PROPOSAL

- 2.1 The application seeks permission for the following:
 - Demolition of Buildings 2 and 4 on the site;
 - Redevelopment of the site to consist of a 6 storey building along the north west part of the site to replace Building 2 and a 3 storey building at the east to replace Building 4;
 - Refurbishment of existing Buildings 1, 3 and 5;

- 40 residential units (12 x 1-bedroom; 22 x 2-bedroom and 6 x 3-bedroom units) of which 36 are proposed as market and 4 are proposed as affordable housing;
- 698sqm (GIA) (830sqm GEA) of Class B1(a) employment floorspace within the basement and ground floors of Buildings 3 and 4;
- 17 car parking spaces including 2 disabled spaces within the central courtyard area;
- 62 cycle parking spaces (6 commercial and 50 residential within the basement and 6 ground floor stand spaces);
- 389sqm of amenity floorspace in the form of garden, terrace and balconies; and
- Associated landscaping and highway works.

2.2 When compared with the scheme granted on appeal in 2012 (referred to in the 'Relevant Planning History' Section below - refs. 2010/6627/P and 2010/6629/C), the key material changes are as follows:

- Maximum height of the proposal has increased by 1.05m;
- Increase in the number of proposed residential units from 15 to 40;
- Change in the mix of units (percentage) from 1 bed units: 6%, 2 bed units: 62.5% and 3+bed units: 31% to 1 bed units: 30%, 2 bed units: 55% and 3+bed units: 15%;
- Provision of affordable housing: 4 social rented units;
- Change in the proposed quantum of employment floorspace to 830sqm GEA (689sqm GIA) from 2,642sqm GEA (1,929sqm GIA);
- Increase in the provision of amenity space from 131sqm to 389sqm;
- Increase in on-site car parking spaces from 8 to 17;
- Increase in disabled car parking spaces from 1 to 2; and
- Increase in cycle car parking spaces from 38 to 62.

3. RELEVANT PLANNING HISTORY

3.1 The following planning history is relevant to the application site:

- P9603202 - Planning permission refused in April 1997 and subsequently dismissed on appeal in February 1998 for the development of the site for 21 residential units, and 8 work/live units by the erection of a 3 storey building along the southern, northern and western boundaries, a 4 storey extension to the frontage building, basement car parking, and associated landscaping and access works.

Refused on grounds of excessive on-site parking; poor internal amenity of residential units; impact of demolition on the conservation area; failure to provide adequate quantum of wheelchair housing; excessive residential density; loss of an existing employment use; failure to provide affordable housing; unacceptable housing mix; and harm to living conditions through noise and vibration caused by the railway line.

- PEX0100712 – Application withdrawn in January 2002 for retention of buildings facing Gloucester Avenue and to rear of site facing railway with additions at roof level to both buildings to provide 7 flats/duplexes, 3 live/work units, 2 houses and office (Class B1) accommodation with car park at basement level.

- 2004/5046/P and 2004/5049/C – Planning and Conservation Area Consent applications withdrawn in January 2005 for demolition of existing rear storage building, alterations including rear lower ground floor (basement) extension and associated works to provide 2 self-contained residential units, parking at rear for 2 cars and new landscaping.
- 2005/1404/P - Planning permission granted in June 2005 for alterations and conversion including rear basement extension and associated works to provide 2 self-contained residential units, and boundary treatment. The application relates to the two-storey with basement detached house, adjoining 42 Gloucester Avenue. The house is currently unoccupied and derelict (identified as building no. 5) – This permission was not implemented and has now expired.
- PEX0300178/P - Application withdrawn in August 2008 for redevelopment of site including an extension linking existing office building and house at 44A Gloucester Avenue to provide additional office space at 2nd and 3rd floor level, change of use of existing warehouse/studios to provide 3 x live/work units at the rear elevational changes to windows, doors and installation of new gates.
- 2009/5659/P and 2009/5661/C - Planning and Conservation Area Consent applications withdrawn in March 2010 for erection of new building to provide 25 residential units (10 x 1 bedroom flats, 10 x 2 bedroom flats, 5 x 3 bedroom flat) (Class C3) and 16 non-residential units (Class B1a).
- 2010/6627/P and 2010/6629/C - Planning and Conservation Area Consent applications refused in April 2011 for demolition of the 2-storey building at the northwest corner of the site and the single-storey building at the eastern corner of the site and re-development of the site by refurbishment of existing buildings and erection of new 4 and 5 storey buildings at the northwest corner of the site and new 3 storey building at the eastern corner (following demolition of existing) to create 15 new residential units (Class C3) and additional office floor space (Class B1).

Planning application refused on grounds of land use, design, amenity, transport, lifetime homes and absence of a Section 106 legal agreement. The applications were subsequently allowed on appeal in March 2012 – These permissions were not implemented and have now expired.

- 2014/7043/P – Application withdrawn in December 2014 for change of use from office use (Class B1) to provide 1 x 1 bed & 17 x 2 bed residential units (Class C3).
- 2015/0462/P – Prior Approval granted subject to a legal agreement in March 2015 for change of use from office (B1) to residential (C3) to provide 1 x 1 bedroom and 16 x 2 bedroom residential units with retention of existing house. This permission is extant.

4. CONSULTATIONS

Statutory Consultees

4.1 Network Rail

Network Rail notes that in relation to our infrastructure, we will need to review the developer's temporary and permanent works designs and risk assessment and method statement (RAMS) and the works will be within 2.75m of the overhead line (OHLE) so the developer will need to approach Network Rail for both isolation and possession of the line and they will be liable for all costs.

We would therefore request that conditions are added to the planning consent so that the works on site and as a permanent arrangement do not impact the safety, operation and integrity of the railway and that there is no impact to the Winding Vaults. We would request that there should be a passage left between the top of the vaults and Gloucester Avenue as a possible emergency escape route if the Vaults are ever brought into use. The escape route should be a minimum 1m in width or whatever width is required by existing Health and Safety legislation. This is considered both necessary and reasonable to ensure that the railway and the heritage assets are protected from the impacts of the proposal and that the basement works do not impact the architectural character of the Grade II* listed Camden Winding Vaults.

Local Groups

4.2 Primrose Hill CAAC

Object to the proposal for the following reasons:

- Loss of work space on the site contrary to Policy DP13 and the wider objectives of Policy CS8.
- The provision of PV panels on the roof of the existing buildings would largely alter its historic appearance, and add a harmfully alien element.
- The apparent loss of render shown in elevation drawings: the rendered elevation is an important element of distinction within the group of buildings.
- The proposed new building adjoining the railway line, and behind no. 44A, may be visible in the longest views possible along Princess Road/St Mark's Square. If this is not proved, the height should be reduced.
- Overlooking of habitable rooms in 44A from the windows proposed in this new building.
- Single aspect units with the provision of openable windows in the boundary wall to the railway line.
- The provision of fenestration on the boundary to Sunny Mews would expose proposed residential bedrooms to direct overlooking.
- The bulk and mass of the proposed 6 storey + basement building is excessive in terms of the general heights in the conservation area.
- Lack of private amenity space for the family dwellings.
- Lack of affordable and social housing on the site.
- Increase in car-parking spaces on the site would create safety issues for pedestrians using Gloucester Avenue and harm the character and appearance of the existing courtyard.
- Concern that the Grade II* Listed Winding Vaults should be able to be brought into beneficial use as a unique part of the national railway heritage which Camden is exceptionally fortunate to have. For this to happen, it is essential that

there is adequate means of escape. The egress through the site is an essential part of that means of escape provision.

Camden Railway Heritage Trust

- 4.3 The vaults are of international importance for their historical and technological significance. They were listed at Grade II in June 1990 and raised to Grade II* in April 2010 and are a survivor of the London and Birmingham Railway (L&BR), the first of all modern main line railways with a London terminus. The L&BR opened to Boxmoor from Euston on 20 July 1837 and to Birmingham on 17 September 1838. The winding engine vaults represent, as one of the very last uses of rope haulage on a public railway, a relatively brief transitional stage in the technological development of railway transportation. Their architectural interest lies in the grand scale and unique design of their underground brick construction.

The most important issue to be addressed is the safeguarding of the means of access/escape to the winding vaults, and thereby the safeguarding of the potential for restoration and reuse of this exceptional structure. In this respect, the historic former electric telegraph works at 44-44A Gloucester Avenue provide the last opportunity to safeguard a service/escape route to the winding vaults on their western side. This would be through the building at the south-eastern end of the Courtyard, adjacent to No. 42 Gloucester Avenue and backing onto the rail side. It is shown in the current application as a single storey with basement, providing a means of escape from the vaults via a narrow corridor, one metre wide. Even if this were sufficient to meet health and safety requirements, we believe that for an access/escape route two basement floors, a staircase and a lift should be incorporated. There is also the potential hazard of contaminated land which will need to be addressed.

Adjoining Occupiers

<i>Number of letters sent</i>	75
<i>Total number of responses received</i>	11
<i>Number in support</i>	0
<i>Number of objections</i>	11

- 4.4 A site notice was displayed on 08/04/2015 and a press notice was displayed in the Ham and High on 09/04/2015. The occupiers of neighbouring properties were also consulted by letter on 02/04/2015.

Representations Summary

- 4.5 Eleven objections have been received raising the following concerns:

- Loss of Class B1 floorspace as compared with the previous permission.
- Increase in residential space as compared with the previous permission.
- Overdevelopment of the site leading to overcrowding and overpopulation.
- The proposal is excessive in height and the introduction of light wells and balconies on the internal courtyard is inappropriate.
- The use of a basement for residential space which is an uninhabitable space.
- Lack of affordable housing.

- The proposal is too large, out of keeping with the surrounding area and does not respect, enhance or preserve the nature of the Primrose Hill Conservation Area.
- Loss of sunlight and daylight to neighbouring residential properties.
- Increase in traffic
- Increase in on-street parking demand
- Prejudicial to pedestrian safety.
- Overlooking and loss of privacy.
- Increase in Noise and pollution.
- The building is close to and controls possible access to the Grade II* listed Winding Vaults.

4.6 The above issues raised are considered in the relevant section of this report below.

5. **POLICIES**

5.1 **National Planning Policy Framework 2012 (NPPF) – Paragraphs 19, 56, 57, 64, 65, 96, 129,131, 134, 137 and 173**

5.2 **The London Plan 2015, consolidated with alterations since 2011**

Policy 3.3 Increasing housing supply

Policy 3.4 Optimising housing potential

Policy 3.5 Quality and design of housing developments

Policy 3.8 Housing choice

Policy 3.10 Definition of affordable housing

Policy 3.11 Affordable housing targets

Policy 3.12 Negotiating affordable housing on individual private residential and mixed use schemes

Policy 4.2 Offices

Policy 4.3 Mixed use development and offices

Policy 5.1 Climate change mitigation

Policy 5.2 Minimising carbon dioxide emissions

Policy 5.3 Sustainable design and construction

Policy 5.7 Renewable energy

Policy 5.11 Green roofs and development site environs

Policy 5.13 Sustainable drainage

Policy 6.9 Cycling

Policy 6.13 Parking

Policy 7.2 An inclusive environment

Policy 7.3 Designing out crime

Policy 7.4 Local character

Policy 7.5 Public realm

Policy 7.6 Architecture

Policy 7.8 Heritage assets and archaeology

Policy 7.14 Improving air quality

5.3 **Mayor's Supplementary Planning Guidance**

5.4 **LDF Core Strategy and Development Policies 2010**

LDF Core Strategy

CS1 Distribution of growth
CS3 Other highly accessible areas
CS4 Areas of More Limited Change
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
CS15 Protecting and Improving our Parks and Open Spaces & encouraging biodiversity
CS16 Improving Camden's health and wellbeing
CS17 Making Camden a safer place
CS18 Dealing with our waste and encouraging recycling
CS19 Delivering and monitoring the Core Strategy

LDF Development Policies

DP2 Making full use of Camden's capacity for housing
DP3 Contributions to the supply of affordable housing
DP5 Homes of different sizes
DP6 Lifetimes homes and wheelchair housing
DP13 Employment premises and sites
DP16 The transport implications of development
DP17 Walking, cycling and public transport
DP18 Parking standards and limiting the availability of car parking
DP19 Managing the impact of parking
DP20 Movement of goods and materials
DP21 Development connecting to the highway network
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
DP28 Noise and vibration
DP29 Improving access

5.5 Supplementary Planning Policies

Camden Planning Guidance (2013 and 2015)

CPG 1 Design
CPG 2 Housing
CPG 3 Sustainability
CPG 5 Town centres, retail and employment
CPG 6 Amenity
CPG 7 Transport
CPG 8 Planning obligations

6. ASSESSMENT

- 6.1 The principal considerations material to the determination of this application are considered in the following sections of this report:

7 Land use principles

- Loss of existing employment floorspace
- Proposed residential use

8 Density

9 Affordable housing, tenure and residential unit size mix

10 Standard of accommodation

- Unit sizes
- Access and inclusive design
- Daylight, sunlight, privacy and aspect
- Noise and vibration
- External amenity space
- Storage / Recycling / Waste Disposal

11 Design, Conservation and Heritage

12 Play and Open Space

13 Landscaping

14 Impact on neighbouring amenity

- Daylight/Sunlight
- Overlooking and loss of privacy
- Noise and disturbance
- Basement excavation

15 Air quality

16 Sustainable design and construction

17 Transport

18 Contamination

19 Flooding and Drainage

20 Construction

21 High Speed 2 (HS2)

22 Planning obligation

23 Mayor of London's Crossrail CIL & Camden CIL

24 Conclusion

25 Recommendation

26 Legal comments

27 Condition

28 Informatives

7. LAND USE PRINCIPLES

Loss of existing employment floorspace

7.1 Paragraph 19 of the NPPF sets out that the Government:

“is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system”.

7.2 London Plan policy 4.2 (c) outlines that local authorities should:

“encourage renewal and modernisation of the existing office stock in viable locations to improve its quality and flexibility”.

7.3 It also expects the provision for a mix of employment facilities and types.

7.4 Policy DP13 further aims to retain business uses and will resist a change to non-business use unless:

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

7.5 The site contains existing Class B1(a), and Class B8 floorspace, which is protected under Policies CS8 and DP13. Part of the Class B1(a) floorspace would be re-provided as part of the proposal, however the re-provision of the existing Class B8 floorspace is not proposed, due to such uses being incompatible with the proposed residential on-site and the uses in the surrounding area, which are also predominately residential. In the 2012 appeal, no objection was raised to the loss of the Class B8 floorspace by the Council or by the Inspector.

7.6 The proposed redevelopment of the site for mixed use accommodation is supported within London Plan Policy 4.3 as it outlines that mixed use development and redevelopment should support consolidation and enhancement of the quality and type of office stock.

7.7 The principle of the loss of the existing employment floorspace on site was discussed in detail in the 2012 planning appeal. Unlike at the time of the appeal, the site is now vacant with the last tenant vacating the site on 31 May 2013. The appeal established that only 81% of the existing floorspace is usable whether in its current form or with basic refurbishment. Of the identified notional Class B8 floorspace, approximately half was agreed to be unusable in its current form, due to the basement areas being fundamentally unsuitable for occupation due to their lack of daylight, poor access and poor quality of accommodation.

7.8 The single storey building (Building 4) attached to the rear building (Building 3) was also agreed to be unusable due to its poor state of repair. In drawing these conclusions, it was agreed at the appeal that the light industrial areas in the rear building were ‘useable’, but would require refurbishment for any such use to

occur in practice.

- 7.9 The replacement employment floorspace that forms part of the proposals is to be concentrated to the rear of the site, fronting the railway, and to the ground and basement levels of the northern end of the site. The location ensures that the proposed office floor spaces utilises as much of the existing floorspace as possible, whilst rationalising and modernising the floorspace to provide high quality accommodation that would attract a number of potential occupiers.
- 7.10 Policy DP13 makes clear that the Council's objective for proposals involving existing business floorspace is to retain land and buildings that are suitable for continued business use.
- 7.11 The 2012 appeal planning application was accompanied by an Employment Floorspace Analysis report. This contained an assessment of each of the planning units within the existing site in terms of their condition and lawful use as at December 2010. This was subsequently updated at the appeal to reflect the situation as of February 2012.
- 7.12 The total existing useable employment floorspace, as agreed in February 2012, was 2,734sq.m (1,929sqm Class B1 use and 805sqm Class B8 use) and therefore this represents the maximum amount of floorspace that is suitable for continued business use.
- 7.13 Policy DP13 makes clear the Council would seek that: "...
- c) the level of employment floorspace is maintained or increased;
 - d) they include other priority uses, such as housing or affordable housing;
 - e) premises for new small, or medium enterprises are provided;
 - f) floorspace suitable for either light industrial, industry or warehousing uses is re-provided where the site has been used for these uses or for offices in premises that are suitable for other business uses;
 - g) the proposed non-employment uses will not prejudice continued industrial use in the surrounding area."
- 7.14 When considering the implications of this policy requirement, that seeks to protect employment floorspace, it is also material to have regard to changes to Permitted Development Rights which allow the change of use from office to residential. Under Class J of the Town and Country Planning (General Permitted Development) (Amendment) (England) (Order 2013), from May 2013 development consisting of the change of use of a building and any land within its curtilage from Use Class B1 (a) to a use falling within Class C3 constitutes 'permitted development', subject to a number of criteria.
- 7.15 A Prior Approval application (ref: 2015/0432/P) has recently been granted for the change of use from office (B1) to residential (C3) to provide 1 x 1 bedroom and 16 x 2 bedroom residential units with retention of existing house. This permission is a material consideration when taking into account the loss of employment space on this site as it establishes the loss of the existing Class B1a floorspace (1,866.4sqm GIA) in its entirety to residential accommodation. The applicant has recently hoarded the site and engaged a contractor to

commence the Prior Approval permission.

7.16 In light of this updated legislation it is considered that the ability to achieve the change of use through Permitted Development rights is a material consideration in the determination of this application.

7.17 The following table summarises the differences in employment areas between the 2012 appeal, Prior Approval and proposed schemes:

Table 1: Proposed Employment Areas

	Extant Planning Permission Scheme (sqm GIA)	Prior Approval Scheme (sqm GIA)	This application (sqm GIA)
Amount of B1a proposed	2,614	0	698
Amount of B8 Proposed	0	816	0
Total amount of Use Class B	2,614	816	698
Amount of existing B1a agreed at appeal	1,929	1,929	1929
Difference in B1 floorspace against existing	+ 685	-1,929	- 1,231

7.18 As set out within Table 1 above, the current application is seeking a decrease in the amount of employment floorspace in comparison to the 2012 appeal scheme. However, were the Prior Approval permission to be implemented the only remaining employment space on the site would be 816sqm of Class B8 floorspace. The 2012 appeal established that the retention of Class B8 floorspace on the site is not a strategic objective. The provision of improvements to the quality and efficiency of employment floorspace was a factor given significant weight in the approval of the appeal scheme.

7.19 The significant improvement in the quality of the proposed employment floorspace is likely to allow for the site to become fully occupied in time following construction of the development, which will increase the occupied employment floorspace by 698sqm. This is considered to mitigate the loss of 1,168.4sqm of floorspace proposed in pure quantitative terms.

7.20 Furthermore, the employment floorspace proposed has been designed so as to offer flexible accommodation to help maximise opportunities for it to be let in the future and is provided in a variety of sizes to be complementary to differing needs. This is considered to be in line with policy DP13.

7.21 In terms of ensuring flexibility of use, as required by paragraph 13.4 accompanying policy DP13, the scheme incorporates a number of design features that the Council identify as being necessary to secure flexible use of

the accommodation in the longer term. By virtue of the inbuilt flexibility in the design, and as a result of the design features, it is considered that the needs of a variety of end users can be met as is required by paragraph 13.6.

- 7.22 The proposal will also be more attractive both internally and externally, with the basement areas benefitting from some natural light.
- 7.23 In summary, whilst the proposal would result in the loss of employment floorspace in reality a significant proportion of the existing stock is of low grade and effectively unusable. Against the Prior Approval scheme recently granted there would be an overall increase of 698sqm of Class B1a floorspace.
- 7.24 The proposed employment space is flexible in accordance with the requirements of policy and the scheme accords with the requirements of criteria e and f of policy DP13.
- 7.25 The proposed mixed re-development of what is currently an underused site will enhance the provision of employment floorspace on the site and will provide higher spec, flexible accommodation that is more likely to be occupied given rise to a net increase in employment levels. When assessed against all other planning considerations, the amount of employment floorspace proposed is considered to be acceptable.

Proposed residential use

- 7.26 The application proposes 40 residential units (12 x 1 bedroom, 22 x 2 bedroom and 6 x 3 bedroom). The principle of additional residential floorspace has already been established by the granting of the 2012 appeal . The provision of additional residential floorspace within the Borough is also strongly supported by Policies CS6 and DP2, which identify housing as the priority land use for the Borough and highlight the need to maximise the supply of housing.
- 7.27 The NPPF also attaches great importance to significantly boosting the supply of new housing. Policy 3.3 of the London Plan further seeks to increase housing supply across the Capital, with minimum housing targets set out in Table 3.1. For Camden, the London Plan proposes an increase in housing delivery in Camden to 8,892 additional dwellings between 2015 and 2025, an annual target of 889 dwellings.
- 7.28 Policy CS6 seeks to meet or exceed a target of 8,925 new homes across the Borough between 2010 and 2025, with Annual Monitoring Reports including a reliance on a number of small sites and windfall sites. Policy DP2 further expects the maximum appropriate contribution to supply of housing on sites that are underused or vacant, taking into account any other uses that are needed on the site.
- 7.29 The site is in a sustainable location, with a PTAL level 4 (Good) and access to local services and amenities. The development proposes the re-use of an existing underutilised site, making the best use of the Borough's limited land. This approach accords with the core principles of the NPPF, which encourages the re-use of previously developed land, and policy CS1.

- 7.30 Policies CS1 and CS4 also support development which makes the best use of land in areas of more limited change which are outside of the growth areas. The key test set out in Policy CS4 is that development in these areas *'respects the character of its surroundings, conserves heritage and other important features and provides environmental improvements and other local benefits where appropriate'*. An assessment of these issues is outlined in further detail below.
- 7.31 In light of the priority given to the delivery of significant number of new dwellings (particularly on underused brownfield sites), the principle of the redevelopment of the site for housing is supported and would fully comply with Council policy.

8.0 DENSITY

- 8.1 The site is located in an 'Urban' setting and has a PTAL of 4 (Good). The London Plan Density Matrix (Table 3.2) prescribes a density of 45-260 units per hectare for this location.
- 8.2 The proposal has a density of 203 units per hectare, which would be in accordance with the density range prescribed. The density range also reflects the sensitivities and constraints of the site in relation to the surrounding heritage assets and retention of existing buildings on the site.

9.0 AFFORDABLE HOUSING, TENURE AND RESIDENTIAL UNIT SIZE MIX

- 9.1 Under London Plan Policies 3.10, 3.11 and 3.12, Camden Policies CS6 and DP3 and CPG2 (Housing), the borough should seek to maximise affordable housing provision with a contribution towards affordable housing being sought in development schemes providing 10 or more units.
- 9.2 Policy DP3 states that the Council will negotiate the development of individual sites to seek the maximum reasonable amount of affordable housing and in doing so will take into account the economics and financial viability of the development including any particular costs associated with it.
- 9.3 Policy 3.12 of the London Plan seeks the maximum reasonable amount of affordable housing when negotiating on individual housing schemes but states that the objective is to encourage rather than restrain residential development. Paragraph 173 of the NPPF imposes an obligation on Councils to ensure viability when setting requirements for affordable housing.
- 9.4 Core Strategy policy CS6 sets a target mix of 60% social rented and 40% intermediate tenure for affordable housing provision within the borough. Camden's SPG suggests 50% of dwellings within the social rented section be three or more bedrooms and 30% with two bedrooms.
- 9.5 The application is accompanied by a financial viability assessment, which has been submitted on a confidential basis in connection with the proposed scheme to justify a lower affordable housing provision on-site. The HCA's Economic Appraisal Tool has been used in order to test scheme viability. The appraisal includes the use of the Prior Approval Scheme as a land value benchmark and provides for onsite delivery of 4 rented tenure affordable housing representing 10% provision. The applicants have also accepted an outturn review

mechanism with the potential to deliver a Deferred Affordable Housing Contribution of up to £4.505 million.

- 9.6 The viability assessment has been independently assessed by a viability expert (BPS) for the Council. A redacted version of the BPS assessment report is attached.
- 9.7 BPS considers the use of the Prior Approval Scheme to be a realistic benchmark land value. Having examined the costs and values of the proposed scheme, the independent assessor confirms that the affordable housing offer made by the applicant reflects an appropriate margin between the value generated by the Prior Approval Scheme land value benchmark and the residual value generated by the proposed scheme.
- 9.8 Subject to confirmation that a registered provider is willing to acquire the affordable units BPS are satisfied that this offer now represents the maximum viable level of affordable housing on-site. However, as the scheme is not fully policy compliant a deferred affordable housing contribution will need to be secured by S106 legal agreement.
- 9.9 Many factors can have a significant impact on the maximum viable contribution to affordable housing, including changes to sales values, changes to build costs, changed specifications for materials and finishes and changes to the cost of finance. These factors can change quickly, and changes of a few percentage points can have a significant impact on the viability of a development. The Council therefore seek to negotiate deferred affordable housing contributions for developments where the provision of housing/ affordable housing falls significantly short of targets in Policy DP3 due to financial viability, and there is a prospect of viability improving prior to completion.
- 9.10 The deferred contribution is not a fixed amount, but is capped at the shortfall between the amount of additional housing/ affordable housing proposed and the Council's policy targets. The actual contribution is determined by a further viability appraisal undertaken at an agreed point after approval of the development but before the scheme is fully occupied.
- 9.11 The proposal would provide 40 units in total, with 36 units (13 x 1 bedroom, 18 x 2 bedroom and 5 x 3 bedroom) being for market housing. The 4 remaining units (3 x 2-bedroom and 1 x 3-bedroom - Units B02, B03, 1.10 and 1.11) would be provided as affordable social rent housing units (10% of the total) intended for those Camden residents on the housing waiting list who are most in need of housing. These units are to be provided at target rent levels. This means that the units will be available for a rent (including service and management charges) that meets the targets for social rent set by the Regulator. This will be secured by legal agreement with specific clauses outlining that the units will be provided at target rent levels in perpetuity.
- 9.12 Policy DP3 expects all developments with a capacity to provide 10 units or more to make a contribution to affordable housing. DP3 introduces a sliding scale for developments between 10 units and 50 units. The 50% target operates on a sliding scale for housing developments, subject to the financial viability of the development, with a norm of 10% for 1,000sqm of additional housing and 50% for

5,000sqm of additional housing, considered to be sites with capacity of 10 dwellings and 50 dwellings respectively.

- 9.13 The proposed scheme will provide 40 flats totalling 4,800sqm (GEA), which triggers an affordable housing requirement of 48% under policy DP3. In line with the requirements of the policy, the provision of affordable housing is expected on site. A policy compliant scheme at this site should therefore provide a target floorspace of 2,304sqm of affordable housing.
- 9.14 The affordable units would be provided on site, however, the level of provision falls short of the policy requirement. The proposal comprises 36 market housing units and 4 affordable units. This equates to a 35% (floorspace) contribution towards affordable housing. Therefore there is a deficit of 13%.
- 9.15 The 4 proposed affordable housing units would have combined floor area of 382sqm NIA. BPS has identified a shortfall in the on-site provision (604sqm) of 1,700sqm against the total required for this site (2,304sqm). This figure has then been multiplied using the ratio set out in policy DP3 resulting in a Deferred Affordable Housing Contribution of up to £4,505,000 to be secured by S106 legal agreement.
- 9.16 No objection has been raised by the Council's Housing Partnerships team to the proposal. The proposal would provide an appropriate tenure and mix of units to meet a variety of demands across the Borough in accordance with London Plan Policy 3.8 and Camden Policies CS6 and DP5. In particular, it would respond to the Dwelling Size Priority Table accompanying Policy DP5, which identifies two bedroom market units as being of 'Very High Priority' (the aim is identified at 40%) – the scheme meets this at 45% provision and is therefore considered to provide an appropriate mix of units.

10.0 STANDARD OF ACCOMMODATION

- 10.1 Policy 3.5 of the London Plan promotes high quality design of housing development that takes into account its physical context, local character, density, tenure and land use mix and relationship with, and provision for public, communal and open spaces taking into account the needs of children and older people.
- 10.2 New development should conform with the minimum space standards set out in Table 3.3 of the London Plan above and Camden Planning Guidance 2 - Housing. Policy 3.8 of the London Plan further recognises that a genuine choice of homes should be provided in terms of both tenure and size and provision should also be made for affordable family housing, wheelchair accessible housing and ensuring all new housing meet Lifetime Homes Standards. This is reflected in Camden Policies CS6, DP6 and DP29, which seek a diverse range of housing products to provide a range of homes accessible across the spectrum of household incomes, the promotion of inclusive design and for all new homes to comply with 'Lifetime Homes' criteria as far as practically possible.
- 10.3 Camden Planning Guidance 2 (CPG2) states that new self-contained dwellings should satisfy the following minimum areas for overall floorspace (excluding communal lobbies and staircases):

Number of persons	1	2	3	4	5	6
Minimum floorspace (m ²)	32	48	61	75	84	93

- 10.4 Policy 3.5 of the London Plan (Table 3.3) also stipulates the following minimum GIA minimum space standards for the proposed development:

Dwelling Type (bedroom (b) / persons-bed spaces (p))	GIA (sq.m)
1p	37
1b2p	50
2b3p	61
2b4p	70
3b4p	74
3b5p	86
4b5p	90
4b6p	99

- 10.5 Within the proposed extended buildings, the units would have GIA's of between 51.9 (for the smaller 1-bedroom units) and 262sq.m (for Unit B01 - the largest 3-bedroom unit). All of the proposed units would meet both Camden's floorspace standards and the London Plan standards in terms of overall size and bedroom size.

Access and inclusive design

- 10.6 The entrances to the buildings are proposed within the inner courtyard area accessed from the main entrance onto Gloucester Avenue. All of the apartments will be DDA accessible with all staircases designed to meet ambulant disabled standards. Due to the existing constraints of the site not all apartments will be accessible via a lift, with 30% not having lift access. All new corridors, principal doors and stairwells are to be designed to provide sufficient width and ease of circulation throughout.
- 10.7 Policy DP6 requires that all new dwellings be designed to meet 'Lifetime Homes' standards. A Lifetime Homes Assessment has been submitted with the application which demonstrates that it is possible to meet all the 16 criteria.
- 10.8 From 1st October 2015 the planning authority are no longer able to apply Lifetime Homes conditions, housing designed in line with our wheelchair design guide, and our space standards for dwellings in CPG2. New build residential developments now must comply with the access standards in Part M of the Building Regulations. This includes parts 1 (Visitable dwellings), 2 (Accessible and adaptable dwellings) and M4 (3) wheelchair user dwellings. The Council will expect all new build housing development to go above that normally required under the Building Regulations with a requirement to also meet Building Regulations part M4 (2); and in this case for 10% of the units to meet part M4 (3) (wheelchair housing), (applied to new build housing providing 10 or more units).
- 10.9 Compliance with the access standards and the wheelchair housing referred to in Part M of the Building Regulations will be secured by condition.

Daylight, sunlight, privacy and aspect

- 10.10 Within the proposed site, 16 of the 40 units would be dual aspect. Of the 14 units that would be single aspect (facing East or West), 9 of these would be 1 bedroom (Flats G01, G02, 104,105,106, 205, 206, 301, 302) units and 5 would be 2 bedroom (Flats B05, G03, 107, 207 and 303) units.
- 10.11 Each flat would have adequate light and ventilation and the proposal would provide a good level of aspect for all future residents with appropriate setbacks from the boundaries of the site and spacing in front of proposed windows being provided. With respect to the possible implications on amenity by way of overlooking and impacts on privacy, this has been addressed through careful positioning of windows and balconies to minimise the potential for overlooking. Given the fact that this is largely a conversion, that the single aspect units would either face east or west (and are not north facing) and that the majority of the flats are of a generous size it is considered that the inclusion of these single aspect units is acceptable.
- 10.12 Given the commercial nature of the site and the courtyard area in general, the residential entrances have been provided at the end of pedestrian pathways separated from the courtyard access road, which is welcomed. This should reduce any potential conflict with the residential units and the use of the courtyard for deliveries and parking. The proposal also includes repaving and landscape improvement works to the courtyard area, which is also welcomed.

External amenity space

- 10.13 Camden Planning Guidance 2 - Housing (CPG2) states that all new dwellings should have access to private outdoor amenity space, e.g. balconies, roof terraces or communal gardens, wherever practical. It accepts that in some instances, existing buildings may not be able to provide balconies or roof terraces and encourages the provision of external amenity space wherever possible. CPG2 makes reference to the Mayor's Housing Supplementary Planning Guidance, which recommends that within all new housing developments, where site constraints do not prohibit it, units should have access to private amenity space, such as private landscaped courtyard, private roof terraces and balconies, with a minimum of 5sq.m of private outdoor space for each 1-2 person dwellings and an extra 1sq.m for each additional occupant being provided.
- 10.14 Within this proposed conversion scheme, the opportunity to provide external amenity space is limited. The proposal would, however, provide 389sqm of amenity space in the form of private garden, terraces and balconies in accordance with the requirements of CPG2 and the Mayor's Housing Supplementary Planning Guidance. On average across the site this equates to approximately 10sqm of amenity space per dwelling.

11.0 DESIGN, CONSERVATION AND HERITAGE

- 11.1 Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that *“(1) In the exercise, with respect to any buildings or other land in a conservation area, of any powers under any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of*

preserving or enhancing the character or appearance of that area. (2)The provisions referred to in subsection (1) are the planning Acts and Part I of the Historic Buildings and Ancient Monuments Act 1953.”

- 11.2 The NPPF (paragraphs 17, 56 and 57), the London Plan (Policies 7.1 to 7.8) and Camden’s Core Strategy (Policies CS14, CS17), Development Policies (DP24) and Camden Planning Guidance (CPG1) place great emphasis on conserving heritage assets in a manner appropriate to their significance and the importance of good design. CPG1 seeks “excellence in design” in Camden. Policy at all levels require buildings, streets and spaces to respond in a manner which promotes inclusive and sustainable development and contributes positively to the relationship between urban and natural environments and the general character of the location.
- 11.3 The NPPF also states that, in determining planning applications where heritage assets are involved, local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets, as well as the desirability of new development making a positive contribution to local character and distinctiveness. The London Plan also requires, at Policy 7.8, that development affecting heritage assets conserve their significance, by being sympathetic to their form, scale, materials and architectural detail. Camden Policy DP25 also seeks to protect other heritage assets including Parks and Gardens of Special Historic Interest and London Squares.
- 11.4 Paragraph 129 of the NPPF advises that *“Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset’s conservation and any aspect of the proposal.”*
- 11.5 Paragraph 132 of the NPPF also advises that: *“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.”*
- 11.6 Paragraph 134 of the NPPF also notes 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.”*
- 11.7 Paragraph 137 further requires that *“Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage*

Sites and within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably.”

- 11.8 The site is located within the Primrose Hill Conservation Area. None of the buildings on the site are listed, but all are identified as making a positive contribution to the conservation area. The Heritage Statement, submitted with this application, provides a detailed analysis of the value of the existing buildings on the site and the proposals in heritage terms in accordance with the requirements of the NPPF.
- 11.9 The Primrose Hill Conservation Area Appraisal finds that the existing tall buildings on the site are ‘positive contributors’ to the conservation area and would therefore be assessed under policy DP25.
- 11.10 The Heritage Assessment statement concludes that only Buildings 1 and 5 make a significant contribution to the townscape in this part of the conservation area. Buildings 2 and 3 have some interest by virtue of their industrial character and materials, however their contribution to the conservation area is limited by virtue of their position and modest architectural qualities/extent of rebuilding. Building 4 has no aesthetic or townscape merit.
- 11.11 The principle of the demolition of the existing buildings identified as number 2 at the northwest corner of the site and number 4 at the eastern corner of the site in connection with redevelopment of the site by refurbishment of the existing buildings and the erection of new 4 and 5 storey buildings at the northwest corner of the site and a new 3 storey building at the eastern corner (following demolition of the existing) to create 15 new residential units (Class C3) and additional office floor space (Class B1) has already been established in the 2012 appeal decision.
- 11.12 The appeal Inspector noted that whilst the buildings referred to as number 44 Gloucester Avenue are stated as making a positive contribution to the area, it is clear that these are separate buildings and should be treated as such for the purposes of whether consent is required. He considered that, similar to listed building considerations, they have a group value and not all buildings contribute equally and the visual effect of demolition would be tempered by the limited value of Building 4 and the limited visibility of Building 2 due to the proximity of the frontage building of Sunny Mews.
- 11.13 As with the findings of the Heritage Assessment submitted, the Inspector concluded that of the buildings to be demolished were of less value to the character and appearance of the conservation area as a whole than those left and whilst their demolition would cause identifiable harm to the designated heritage asset, the harm would not amount to substantial harm.
- 11.14 When compared with the appeal scheme, the proposal includes an extra floor of accommodation to the north-west corner of the site, however due to the rationalisation of the proposed scheme this does not result in the proposals being an additional storey in height in this location. The permitted appeal scheme has a Finish Roof Level of 49.52m and the proposed scheme has a Finish roof Level

of 50.57m. This is demonstrated in the submitted overlay drawing in Figure 2 below.



Figure 2: Comparison between appeal and current schemes

- 11.15 The proposed scheme is therefore only 1.05m taller than the permitted which in the context of the conservation area has a negligible impact and is not significant on the character and appearance of the conservation area.
- 11.16 A Visual Impact Assessment has been submitted as part of the application which provides a number of viewpoints based on those agreed during the 2012 appeal. CGI images have been provided that demonstrate the overall mass of the proposed buildings on the site would be similar to those allowed on appeal and would not have any significantly greater impact on the streetscene or in long distance views.
- 11.17 The improvement works to Building 5, the house, including alterations to the façade, roof and windows openings, would be a significant benefit to the streetscene and the wider area as it is currently unused and visually unattractive.
- 11.18 Works to the main building fronting Gloucester Avenue, Building 1, would secure its beneficial use as a positive feature of the area and the proposed extension to house the lift and services would be little seen from truly public places. The view from within the courtyard would be of a distinct, modern addition to provide a glazed stair-core, clearly separate from the design of the older building but not seriously obscuring appreciation of its qualities. The benefits of providing the improved access and facilities whilst preserving the usable floorspace outweighs any adverse effect.

- 11.19 Similarly, work to Building 3 to the rear, involving alterations to the façade, window openings, roof and basement area, would improve its appearance and safeguard its future as a feature of views into the courtyard from the road.
- 11.20 The replacement for Building 4 would mediate visually between the newer part 4, part 5-storey buildings at number 42 Gloucester Avenue and the existing structures on the site and whilst its roof would be visible above and beyond that of the house in some views, this would not be harmful due to the separation between them and the robust design of the house itself remaining the dominant feature. Only a roof would be seen; a grey/black form not unlike sky behind.
- 11.21 The new buildings to replace Building 2, including the part to the rear, is of two forms, that adjoining Building 1 provide a more traditional character and appearance, and although the roof may be glimpsed through street trees in medium distance views, this would not seriously erode the value of the view or the building being again a grey/black form.
- 11.22 To the rear the buildings would mediate between the traditional and the modern at Sunny Mews and would not be seen in close views due to the set-back and the cut-off of the frontage of the neighbouring building. There would be a glimpse of the roof and upper part of the building in the medium views just mentioned, but this would not cause harm as no glazing would be widely visible and the proposed metal cladding on the roof would have a similar appearance to a sky background.
- 11.23 Improvements to the courtyard itself and re-arrangement of parking and proposed hard landscaping works would enhance its appearance.
- 11.24 The proposal would be visible in views from the supermarket on the far side of the railway tracks. That is a view into, rather than from within, the conservation area and the new buildings at either end of Building 3 would be prominent. As noted by the Inspector in the 2012 appeal, this is not identified as an important view in the conservation area appraisal and its value is reduced by firstly the clutter of overhead line equipment on the railway and secondly by the quality of the viewpoint, being the service area and bus stops of the supermarket. Views from the railway would be fleeting and among a range of varied buildings. There is nothing about the design of the new buildings that would cause harm in these views.
- 11.25 In the long distance view along Princess Road at the junction of St Mark's Square, the proposals would not be widely visible due to the curvature of the road (it does not align perpendicular with the site at this junction) and the interposing development in the foreground. Therefore, as discussed at the appeal, the proposed scheme is not considered to impact on the long view from this location.
- 11.26 Overall, the proposal will deliver the restoration and refurbishment of two important heritage assets, improving the character and appearance of the conservation area and setting of nearby listed buildings. The "less than substantial harm" that would be caused by the demolition of buildings 2 and 4 would be outweighed by the public benefits of the proposal set out above in accordance with paragraph 134 of the NPPF.

- 11.27 The replacement buildings make more efficient use of the site as part of a balanced scheme, which will improve the quality of employment space across the site and deliver affordable housing on a previously developed site. The replacement buildings are of good quality design which will contribute something of interest to an area where such buildings provide an interesting counterpoint to the established run of speculative, historic residential development.
- 11.28 Careful consideration has been made to the proposed design of the buildings to respect the character and appearance of the application site. The proposed design respects the detailing and the retention of the pattern of the doors and windows has been retained, where possible, ensuring the special character is retained.
- 11.29 The proposal originally included a perfunctory flat roof to the new building in the north western corner of the site and the introduction of photovoltaic panels (PVs) to the southern pitch of all retained buildings on the site. The roof of this new building has been amended replacing the flat roof with a pitched roof to better reflect the architectural language of the proposal with a series of 3 pitched roofs now being proposed on the western elevation. The PVs have also been reduced with those panels on the southern roofslopes of Building 1, 3 and 5 prominent in views from the road being removed. A condition requiring full details and samples of the facing materials, including windows and door frames, and the PV panels proposed on the southern roofslopes of Building 2 would be attached to any permission granted to safeguard the appearance of the buildings on the site and to preserve the character and appearance of the immediate area.
- 11.30 Concern has been raised in relation to the Grade II* listed stationary winding engine vaults that are located under the railway to the north of the site. The proposal would not impact on the setting or character of this historically significant listed structure. As part of the proposal, a passage is to be provided between the top of the vault and Gloucester Avenue as a possible emergency escape route if the vaults are ever brought into use. A 1 metre width access has been proposed as part of the scheme. This proposed access was not included as part of the appeal scheme. A condition is to be attached to any permission granted to ensure that the access is provided.
- 11.31 The proposal would improve on the design of the appeal scheme and would preserve the character and appearance of the conservation area. It would respect the character, context and the form and scale of neighbouring buildings and would sit comfortably within the streetscene and surrounding area.
- 11.32 As such, the proposal is considered to be acceptable and in accordance with Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, the NPPF and Council policy.

12.0 PLAY AND OPEN SPACE

- 12.1 Pursuant to Core Strategy policy CS15 and Development Policy DP24, residential developments are required to provide communal and private outdoor space to meet the needs of prospective residents. Guidance requires 9sqm per bedspace which equates to 1,458sqm for the development (162 bedspaces x 9sqm).

12.2 Achieving this full quantum can be challenging, particularly on sites within densely built up parts of the borough like this. As such, the proposal does not include any onsite open space. In circumstances such as this a financial contribution is required toward provision, maintenance and improvement of open space. In accordance with the methodologies in CPG8 Planning Obligations a public open space contribution of £52,394 would be required for this development for the creation/improvement of open space within the surrounding area. This would be secured by S106 legal agreement.

13.0 LANDSCAPING

13.1 Policy DP24 requires development to consider existing natural features, such as trees, and to provide appropriate hard and soft landscaping. There are no trees on the application site.

13.2 As part of the proposal, the existing courtyard area is to undergo improvement works with new hard landscaping and soft landscaping elements to create a more amenable environment that building inhabitants can use and to 17 car parking spaces. In line within policy DP19, the off street parking area would provide soft landscaping, permeable surfaces and boundary treatment. This would include permeable natural stone blocks within the courtyard which will allow permeability for drainage. In addition, landscaping planting is also proposed to soften the hard landscaping of the parking areas.

13.3 It is also proposed to create landscaping which retains the existing trees along Gloucester Avenue. As assessed within the Arboricultural / Landscaping Assessment submitted in support of application, the proposals will not have any direct impact on the trees along Gloucester Avenue. Detailed mitigation measures are set out within the report to protect the trees during construction.

14.0 IMPACT ON NEIGHBOURING AMENITY

14.1 Policies CS5, DP26 and CPG6 (Amenity) are relevant with regards to the impact on the amenity of residential properties in the area. Any impact from construction works is dealt with in the transport section.

14.2 The closest residential units to the application site are in Gloucester Avenue to the east (No.42), south (Nos.67 to 85 (odds)) and west (Nos.48 and 50) and in Sunny Mews (Nos.1-6) to the west.

14.3 Policy DP26 states that the Council would only grant permission for development that does not cause harm to amenity. It states that the Council should consider the impact on daylight/sunlight, outlook, an increased sense of enclosure, privacy, noise and odour/cooking fumes.

Daylight/sunlight

14.4 A Daylight and Sunlight Study Report has been submitted with the application. This provides an assessment of the potential impact of the development on sunlight, daylight and overshadowing to neighbouring residential properties in Gloucester Avenue and Sunny Mews based on the approach set out in the

Building Research Establishment's (BRE) 'Site Layout Planning for Daylight and Sunlight: A Good Practice Guide'. This includes an assessment of impacts on the site's residential neighbours.

- 14.5 Daylight has been assessed in terms of Vertical Sky Component (VSC), sunlight has been assessed in terms of Annual Probable Sunlight Hours (APSH) and overshadowing has been assessed against the above BRE guidelines.
- 14.6 The conclusions set out within the submitted Daylight and Sunlight Study Report show that all the surrounding properties meet the BRE criteria for all three light assessments and the impact to the surrounding neighbours is in line with the intentions of the BRE criteria. The proposed scheme would not have a noticeable impact to the rooms within surrounding properties.
- 14.7 Internal daylight and sunlight analysis is also in line with the overall intentions of the BRE guidance, in the context of the Sites urban setting.

Outlook, overlooking and loss of privacy

- 14.8 The pattern of development in the surrounding area comprises terraces of properties in long narrow strips parallel to the railway cutting. The residential properties potentially affected by the proposed development in terms of outlook, overlooking and privacy are those located to the west of the site: nos. 48-50 Gloucester Avenue and nos.1-6 Sunny Mews.
- 14.9 As part of the proposal there would be window openings and inset-balconies on the flank wall facing west towards Sunny Mews and the rears of nos. 48-50 Gloucester Avenue. These windows and inset-balconies/terraces would be located approximately 9m at their nearest point from the rear elevation of no.48 Gloucester Avenue and 20.1m from no.1 Sunny Mews and separated by an access road and parking area. However as they would be at an oblique angle and would not directly face the habitable windows they would not allow views deep into their rooms. The rear gardens of nos.48 and 50 Gloucester Avenue are already overlooked by adjacent houses and it is not considered to be reasonable or justifiable to require that the windows within the proposed development be obscurely glazed to 1.70m internally and fixed shut or that the proposed terraces/balconies be fitted with privacy screens.
- 14.10 The windows to surrounding residential buildings do not directly face the proposed buildings, but are located at an oblique angle from the front and rear windows of these properties. By virtue of the size and scale of the proposed replacement buildings and the distance which they would be set away from neighbouring properties the development is not considered to result in a loss of outlook to neighbouring residential occupiers.
- 14.11 The proposal would have a similar relationship with neighbouring residential properties as the 2012 appeal scheme to which the Inspector raised no objection on residential amenity grounds. Given the separation distances proposed and positioning of the proposed windows and amenity areas, the proposed extended buildings would not appear visually overbearing or result in any greater increase in

overlooking or loss of privacy to neighbouring properties relative to the existing situation and the 2012 appeal scheme.

Noise and disturbance

- 14.12 The ground floor Class B1a Office use and new residential units proposed within the extended parts of the buildings would not have a detrimental impact on the amenity of surrounding properties in terms of noise or disturbance.
- 14.13 No extract ducts or additional plant such as air conditioning units are proposed and should the applicant require these in the future separate planning permission would be required.
- 14.14 The site is constrained by the railway line directly abutting the site to the north east and its small size in an urban location with existing uses directly to the south and north and further buildings over Gloucester Avenue.
- 14.15 The Acoustic Assessment submitted with the application details that the external and internal noise level criteria have been proposed in line with the standards set out in Camden policy DP28, BS 8233:2010 and the World Health Organisation guidelines.
- 14.16 In line with Camden's guidance attenuation is to be included to control noise and specification of acoustic glazing systems have been provided. It is outlined in the Acoustic Assessment that were it is expected that windows will remain closed to control noise, acoustically treating vents in the window frame or walls, or via an alternative whole-building system will be included within the detailed design, to ensure the residential units are ventilated.
- 14.17 It is proposed that the noise from the commercial elements along with plant and machinery noise emissions, can be controlled by way of planning condition were appropriate.
- 14.18 The proposed development achieves acceptable standards for future and existing residential occupiers, in accordance with national standards and Development Management Plan policy DP28.
- 14.19 Subject to the above matters being secured by condition, the proposal would not result in any significant increase in noise and disturbance to neighbouring properties.

Basement excavation

- 14.20 The proposed basements will extend approximately 3m deep below the footprint of the new buildings replacing Buildings 2 and 4 whilst the existing basement beneath the footprint of Building 3 along the north-eastern boundary of the site will be lowered by 1m. The proposed excavation works and the impact on drainage, flooding, groundwater conditions and structural stability are assessed in respect of policy DP27 and the guidance contained within CPG4 (but to an extent also CS5,

CS14, DP23, DP25, DP26).

- 14.21 A full Basement Impact Assessment (BIA), undertaken by Geotechnical and Environmental Associates - a company of qualified structural engineers, has been submitted with the application. The report follows stages 1 to 4 of the BIA process outlined in CPG4 (Screen and Scoping).
- 14.22 Soil investigations have been carried out which show that the subsoil is London Clay and the BIA identifies that the ground conditions are such that there would be no significant impact on land stability and structural stability of neighbouring buildings, water quality and hydrology. In addition, the proposal is considered not to increase flood risk in the area nor impact upon the structural integrity of the nearby Grade II* listed stationary winding engine vaults that are located under the railway to the north of the site.
- 14.23 The BIA has been independently assessed by Campbell Reith who considers the assessment to be acceptable. The proposed basement excavation would not cause harm to the built or natural environment or local amenity and does not result in flooding or ground instability, in line with the requirements of Policy DP27. A condition would be attached to any permission granted to ensure that a suitably qualified engineer supervises the site works.

15.0 AIR QUALITY

- 15.1 Policies CS16 and DP32 are relevant with regards to air quality. Policy DP32 requires the submission of air quality assessments for developments that could cause harm to air quality. Mitigation measures are expected in developments located in areas of poor air quality.
- 15.2 The application site lies within an Air Quality Management Area. An Air Quality assessment has been undertaken and a sensitivity test also undertaken, assuming no reduction in the background in future years, and it was found that air quality conditions would be acceptable in 2017.
- 15.3 The effect of development traffic was classed as “negligible” and the change would be imperceptible and therefore no additional mitigation measures were considered to be required.
- 15.4 The air quality assessment submitted has not taken into consideration emissions from the railway line or outlined any necessary mitigation measures that may be required. It is therefore considered appropriate that a condition be attached to any permission granted requiring a revised assessment to be submitted and approved that takes the impact of the railings on future occupiers into consideration.
- 15.5 Dust mitigation measures would be required within the CMP and would be secured by S106 legal agreement as part of any permission granted as set out below.

16.0 SUSTAINABLE DESIGN AND CONSTRUCTION

- 16.1 Paragraph 96 of the NPPF states that local authorities should expect new development to comply with adopted Local Plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable. It also outlines that new development should take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.
- 16.2 The London Plan climate change policies as set out within Chapter 5 collectively require developments to make the fullest contribution to the mitigation of, and adaptation to, climate change, and to minimise carbon dioxide emissions.
- 16.3 London Plan Policy 5.2 sets out an energy hierarchy (Be Lean, Be Clean, Be Green) within which development proposals should seek to minimise carbon dioxide emissions. The Policy also sets a target for residential buildings to achieve a 40% improvement on 2010 Building Regulations for carbon dioxide emissions. The London Plan (April 2014) update states that a 35 per cent carbon reduction target beyond Part L 2013 which is broadly equivalent to the 40 per cent target beyond Part L 2010 is to be achieved.
- 16.4 London Plan Policy 5.3 seeks to achieve the highest standards of sustainable design and construction and states development proposals should demonstrate that sustainable design standards are integrated into the proposal, including its construction and operation. Policy 5.7 also seeks to increase the proportion of energy generated from renewable sources.
- 16.5 Policies CS13 and DP22 promote higher environmental standards in design and construction and provide details of the sustainability standards the Council expects development to meet. An Energy Strategy and Sustainability Statement have been submitted with the application.
- 16.6 The energy strategy for the site achieves an overall reduction of 44.3% over the baseline performance through energy efficiency measures and renewable strategies. In accordance with the London Plan this breaks down as follows:
- Be Lean – 42.5%
 - Be Green - 12.8%
- 16.7 The application states that the energy performance will enable the development to achieve the energy targets as required to achieve BREEAM Domestic Refurbishment 'Very Good', and Code for Sustainable Homes 'Level 4' (this has now been withdrawn and can no longer be secured), and BREEAM Refurbishment and Fit-Out 'Very Good' for the non-domestic spaces. Details of how this is to be achieved are set out within the Sustainability Report, Energy Report and Design and Access Statement submitted in support of the application.
- 16.8 The BREEAM Domestic Refurbishment dwellings, and the BREEAM Refurbishment and Fit-Out pre-assessment for the non-domestic spaces achieved 65.46 credits and 58.07 credits respectively, which both exceed the 55 credits required for

BREEAM 'Very Good', but falls short of the BREEAM Excellent requirements set out in Camden Council's Development Policy and Sustainability Planning Guidance. Justifications for these are provided within the respective assessment sections for BREEAM Domestic Refurbishment and BREEAM Refurbishment and Fit-Out.

- 16.9 In accordance with the remaining sustainability standards set out in Policies CS13 and DP22, it is still considered appropriate to secure BREEAM domestic refurbishment 'Very Good' and BREEAM Refurbishment and Fit-Out 'Very Good' for the non-domestic spaces, together with the minimum sub-targets for Energy, Water and Materials through a S106 sustainability plan requirement. An energy efficiency and renewable energy plan is also considered to be appropriate to be secured by S106.
- 16.10 Policy CS15 also seeks to ensure that new development conserves and enhances wildlife habitats by greening the environment. The applicants have proposed new green roofs on the proposed extended buildings and the details provided would be secured by condition on a planning permission granted.
- 16.11 It should be recognised that there is considered to be limited scope within the constraints of the development to provide any further biodiversity measures and the proposal is consistent with Policy CS15.
- 16.12 It is not possible for the development to link into an existing or proposed decentralised energy scheme in line with the second element of the hierarchy. This is because the site is not in the vicinity of an existing or emerging network and is too restricted to provide on-site CHP plant.

17.0 TRANSPORT

- 17.1 The site has a Public Transport Accessibility Level (PTAL) of 4 out of 6, which is considered to be a good. There are bus stops located along Regent's Park Road at both junctions with Princess Road and Gloucester Avenue. The nearest bus stop is along Regent's Park Road, and is approximately 285 metres south of the application site.
- 17.2 The nearest tube station to the proposed site is Chalk Farm Station, which is around 656 metres north of the site. Chalk Farm Station forms part of the Northern Line.
- 17.3 Chalk Farm station is accessible from the application site via the existing pedestrian network, which is a good quality route with good crossing facilities.

Car Parking

- 17.4 Policy DP18 states that the Council will seek to ensure that developments provide the minimum necessary car parking provision. The Council expects development to be car free in the Central London Area, the town centres of Camden Town, Finchley Road/Swiss Cottage, Kentish Town, Kilburn High Road and West Hampstead, and other areas within Controlled Parking Zones that are easily accessible by public transport.

- 17.5 The site is located in the Primrose Hill Conservation Area and the Primrose Hill controlled parking zone (CA-J) which operates between 0830 and 1800 hours on Monday to Saturday.
- 17.6 The proposal would retain 17 car parking spaces previously associated with the existing office use. 4 of the spaces would have access to electric vehicle charging points and 2 of the spaces would be fully accessible disabled parking spaces. The applicant is willing to agree to a car-capped (permit free) agreement in order to prevent future residents from obtaining resident parking permits for the controlled parking zone. This agreement would be secured as a Section 106 planning obligation. The applicant has confirmed that they are willing to enter into such an agreement.
- 17.7 The site has a PTAL rating of 4 which is considered good access and as such the provision of car parking on site would not be in accordance with the Council's policies as noted by the applicant within their transport statement. A car free development on this site would therefore be the Council's preference. However, it is important to note the existing situation and that which was granted at appeal in March 2012, since which time the Council has not changed their approach to parking provision.
- 17.8 The scheme approved by the Planning Inspector in the 2012 appeal included 8 on-site car parking spaces. This equates to 0.5 spaces per residential unit and was based on Camden's car parking standards which can be found in Appendix 2 of the Camden Development Policies. The proposed level of car parking provision (17 on-site car parking spaces) equates to 0.4 spaces per unit which would be a lower ratio than the appeal scheme and considered to be acceptable as it would be consistent with the Planning Inspector's decision.
- 17.9 For car free and car-capped development, the Council will:
- not issue on-street parking permits;
 - use planning obligations to ensure that future occupants are aware they are not entitled to on-street parking permits; and
 - not grant planning permission for development that incorporates car parking spaces, other than spaces designated for people with disabilities, and a limited number of spaces for car capped housing in accordance with Council's Parking Standards.
- 17.10 No objection has been raised by the Council's Transportation Section to the proposal. Subject to a car capped development being secured as a section 106 planning obligation, the proposal would be in accordance with policies CS11, CS19, DP18 and DP19.

Cycle Parking

- 17.11 Policy DP18 requires development to sufficiently provide for the needs of cyclists, which are contained in Appendix 2 of the Development Policies document. The adopted London Plan March 2015 requires the provision of 1 space per 1 bedroom unit and 2 spaces per 2+ bedroom unit. As the complete development comprises 12 one bedroom units, 22 two bedroom units and 6 three bedroom units, this gives a requirement for a total of 68 cycle parking spaces for the residential part of the

development to meet the minimum requirements of the London Plan. In addition, 8 cycle parking spaces are required for the office use to meet the London Plan minimum requirements.

- 17.12 The submitted basement and ground floor plans indicate that 56 residential and 6 commercial cycle spaces would be provided within 3 stores at basement level and 6 (undefined) would be provided on external cycle stances at ground floor level. This level of provision would not meet the minimum London Plan requirements.
- 17.13 Details of the cycle parking facilities would be secured by condition to demonstrate that the scheme complies with the London Plan minimum requirements and the guidance provided within CPG7. The provision of this level of cycle parking would be secured by condition on any planning permission granted.

Managing the impacts of construction on the surrounding highway network

- 17.14 Policies DP20 and DP21 seek to protect the safety and operation of the highway network. For some development this may require control over how the development is implemented (including demolition and construction) through a Construction Management Plan (CMP) secured via a S106 legal agreement.
- 17.15 This site is located in the Primrose Hill Conservation Area. The Council's primary concern is public safety but we also need to ensure that construction traffic does not create (or add to existing) traffic congestion in the local area. The proposal is also likely to lead to a variety of amenity issues for local people (e.g. noise, vibration, air quality). The Council needs to ensure that the development can be implemented without being detrimental to amenity or the safe and efficient operation of the highway network in the local area. A CMP would therefore need to be secured as a Section 106 planning obligation should planning permission be granted.
- 17.16 A draft CMP has been submitted with the application. Whilst this provides some information on how the demolition and construction works will be carried out, further information will need to be provided once a contractor has been appointed and prior to any works commencing on site.
- 17.17 The CMP should include the following:

- Proposed start and end dates for each phase of construction.
- Proposed routes for vehicles between the site and the Transport for London Road Network (TLRN).
- Swept path drawings for any tight manoeuvres on vehicle routes to the site.
- Parking and loading arrangements of vehicles and delivery of materials and plant to the site.
- Details of the site manager and the person responsible for community liaison.
- Details of proposed overhang (if any) of the public highway.
- Details of consultation on a draft Construction Management Plan with local residents, business, local groups (e.g. residents/tenants and business associations) and Ward Councillors. Details should include who was consulted, how the consultation was conducted and the comments received in response to the consultation. In response to the comments received, the Construction

Management Plan should then be amended where appropriate and where not appropriate a reason should be given why not. The revised Construction Management Plan should also include a list of all the comments received.

- 17.18 The CMP would be secured by means of the S106 Legal Agreement in any planning permission granted.
- 17.19 Any occupation of the highway, such as for hoarding, skips or storage of materials, would require a licence from Highways Management and this, the CMP along with the existing on-street waiting and loading controls, should be sufficient to ensure the work is carried out in such a way as to not adversely affecting the safety or operation of the public highway.

Servicing and Refuse/Recycling Collection

- 17.20 When the application site was operational, the majority of deliveries undertaken by transit panel vans to the site took place via the existing site access points on Gloucester Avenue. For infrequent deliveries undertaken by larger goods vehicles, unloading took place from the carriageway on Gloucester Avenue.
- 17.21 As per the previous arrangements for the former office use on the site, the majority of deliveries to the residential units would take place off-street via the existing site access points, with only occasional deliveries taking place from the carriageway on Gloucester Avenue. With regards to refuse/recycling collection, the development proposals provide a policy compliant allocation of bin storage within commercial and residential bin stores located at basement level. A separate goods lift for refuse management only has been incorporated into the design proposals.
- 17.22 It is anticipated that there will be a reduction in the number of deliveries associated with the development proposals as offices typically receive a relatively higher number of deliveries per day than residential developments. This is considered to be a benefit of the scheme in terms of traffic congestion and highway safety on the basis that there would be fewer vehicular movements to/from the site.

Environmental Improvements

- 17.23 The development would introduce new residents to the area and the core strategy aims to encourage walking and cycling as the primary mode of transport for short journeys. The Council is committed to improving cycling and pedestrian routes in the area. A financial contribution of £55,000 should therefore be secured as a section 106 planning obligation in connection with environmental improvement works within the local area.

Highway and Public Realm Improvements directly adjacent to the site

- 17.24 In order to tie the development into the surrounding urban environment, a financial contribution is required to make the footway continuous along the front of the site to ensure pedestrian priority, but be reinforced to allow for occasional servicing movements with dropped kerbs to enable access to the service yard. This would be in accordance with policy DP21. An added benefit of the highways works is that damage caused to the highway in the area of the proposed highways works during construction can be repaired.

17.25 This work and any other work that needs to be undertaken within the highway reservation would need to be secured through a S106 Legal Agreement as part of any planning application granted. The Council would undertake all works on the highway at the cost to the developer at a cost of £30,999.73. The works would include repaving the footway and 2 vehicular crossovers directly adjacent to the site on Gloucester Avenue in like-for-like materials; and any other works the Council acting reasonably considers necessary as a direct result of the development.

18.0 CONTAMINATION

18.1 The NPPF notes that the planning system should contribute to and enhance the local environment by remediating contaminated land, and that the responsibility for ensuring a safe development rests with the developer.

18.2 The application site does not fall within the definition of 'contaminated land' as described in part 2A of the Environmental Protection Act 1990, and consequently there are no significant contamination risks associated with the proposed development. The historical land use of the site was a former Telegraph Stores between 1900 and 1939 and Warehouse between 1952 and 1971, both of which the potential for contamination is considered to be low risk. However, the site is located adjacent to former Railway lands/sidings (1871 to 1971) which are considered medium risk and there was a former chemical works (1952 to 1971) within 50m of the site which is considered high risk. It is also noted that the site is located on a hydro constraint surface water layer.

18.3 No objection has been raised by the Council's Environmental Health Section to the proposal. Given the potential for contamination on the site, a condition is recommended should permission be granted, to secure a ground investigation programme 28 days ahead of works starting on site.

18.4 With regard to asbestos, the developer must provide an intrusive pre-demolition and refurbishment asbestos survey in accordance with HSG264 supported by an appropriate mitigation scheme to control risks to future occupiers. The scheme must be written by a suitably qualified person and shall be submitted to the LPA and must be approved prior to commencement of the development. The scheme as submitted shall demonstrably identify potential sources of asbestos contamination and detail removal or mitigation appropriate for the proposed end use. Detailed working methods are not required but the scheme of mitigation shall be independently verified to the satisfaction of the LPA prior to occupation. An informative would be attached to any permission granted.

19 FLOODING AND DRAINAGE

19.1 The NPPF confirms that flooding is an issue to be considered when determining planning applications. Policies CS13 and DP23 are also relevant with regard to flood risk and drainage.

19.2 The surrounding area mainly consists of residential terraced properties along Gloucester Avenue. These all have original lower ground floors under the footprint. The previous 2012 appeal scheme proposed a relatively small basement in comparison to surrounding basements and it was concluded that the proposals

would have no negative impact on the local ground, surface water and ground water conditions.

- 19.3 The site falls within Flood Zone 1, which is assessed as having a less than 1 in 1,000 annual probability of river or sea flooding (<0.1%). The 2012 appeal scheme did not include a Flood Risk Assessment and it was not considered that the site required one in order to grant permission for residential accommodation on the site.
- 19.4 The BIA submitted considers the issue of flooding and concludes that the proposal would not increase flood risk in the area. Given the low flood risk and findings of the BIA and Inspector in the 2012 appeal scheme, the proposal would raise no concerns with regards to flood risk.
- 19.5 With respect to drainage, limited information has been provided with the application. A condition requiring a Surface Water Sustainable Urban Drainage Strategy is therefore considered to be appropriate should planning permission be granted. This will need to confirm that a flow control device will be incorporated ahead of the final outfall to the existing adopted sewer system to ensure that the discharge rate does not exceed 50% of the rate which exists from the development presently (in a 1 in 1 year return period storm event). The onsite surface water drainage system will also need to be designed to withstand runoff generated from all storm events up to and including a peak 1 in 100 year return period storm, plus an allowance for the potential effects of climate change (+30%). Rainwater from roof areas will be collected for reuse, for irrigation purposes, with any surplus overflowing into the main onsite surface water drainage system. The design of the drainage system will assume that any rainwater harvesting vessels are 'full' at the time of a heavy rainfall event.

20. CONSTRUCTION

- 20.1 The proposed development is large enough to generate significant local economic benefits. Policy CS19 and Camden Planning Guidance state that in the case of such developments the Council will seek to secure employment and training opportunities for local residents and opportunities for businesses based in the Borough to secure contracts to provide goods and services.
- 20.2 In line with CPG8, a range of training and employment benefits are to be secured in order to provide opportunities during and after the construction phase for local residents and businesses. This package of recruitment, apprenticeship and procurement measures will be secured by S106 legal agreement and will comprise:
- That the contractor be required to work to a target of 20% local recruitment.
 - That the contractor advertise all construction vacancies and work placement opportunities exclusively with the King's Cross Construction Skills Centre (KXCSC) for a period of 1 week before marketing more widely.
 - That the contractor recruits a minimum of 4 construction apprentices and pay the council a support fee of £1,500 per apprentice. Recruitment of construction apprentices should be conducted through the Council's KXCSC.
 - That the contractor sign up to the Camden Local Procurement Code, which includes a local supply chain target of 10%.

- That the contractor provides a local employment, skills and local supply plan setting out their plan for delivering the above requirements.

20.3 The proposals are therefore in accordance with the guidance set out in CPG5 and policies CS8 and DP13 of the LDF.

21. HIGH SPEED 2 (HS2)

21.1 The proposed site is located within an area safeguarded against certain sub-surface development for the proposed HS2 line. The Basement Impact Assessment submitted as part of the application discusses the implications of this.

21.2 In summary, HS2 has confirmed that they intend to serve a compulsory purchase order for subsoil at 9m below ground level and below, which is currently considered as a no building zone.

21.3 The basement proposed has therefore been designed in line with this restriction and the proposed basement is only proposed to a depth of approximately 3m.

21.4 The proposal would therefore have no adverse impact on HS2 and would be in line with the criteria set out within their guidance.

22. PLANNING OBLIGATIONS

22.1 The 'Heads of Terms' embodied in the S106 legal agreement referred to above would include the following:

- Affordable housing
- Deferred Affordable Housing Contribution
- Construction/Demolition Management Plan
- Car-capped development.
- Provision of wheelchair accessible units
- Local employment plan including 4 apprentices and a support fee of £6,000
- Highways contribution of £30,999.73
- BREEAM domestic refurbishment 'Very Good'
- BREEAM Refurbishment and Fit-Out 'Very Good' (with minimum sub-targets for Energy, Water and Materials)
- Energy efficiency and renewable energy plan
- Play Open space contribution of £52,394
- Environmental Improvement Contribution of £55,000

23. MAYOR OF LONDON'S CROSSRAIL CIL AND CAMDEN'S CIL

23.1 The proposal will be liable for both the Mayor of London's CIL and Camden's CIL as the net increase in floorspace of 3,985.70sqm exceeds 100sqm GIA. Based on the Mayor's CIL and Camden's CIL charging schedules and the information given on the plans, the charges are likely to be £199,285 (3,985.70sqm x £50) for Mayoral CIL and £1,643,850 (698sqm (Class B1a office) x £25 and 3,287.70sqm x £500 for Class C3 residential) for Camden's CIL. An informative is to be attached

advising the applicant of these charges.

24. CONCLUSION

- 24.1 The reprovision of part of the former Class B1a office floorspace is welcomed and the principle of the redevelopment of the site for mixed employment and housing use is supported and complies fully with Council policy.
- 24.2 The application is accompanied by a financial viability assessment, which provides justification for not providing a policy-compliant level of affordable housing. This has been independently assessed on behalf of the Council, with the assessment concluding that the proposal provides the maximum reasonable level of affordable housing delivery from the scheme consistent with its viability. On this basis, the proposal complies with Council policy.
- 24.3 The density of development is in accordance with London Plan policy and optimises additional housing on an underutilised brownfield site in an accessible location.
- 24.4 The proposal provides an appropriate mix of tenure and units with a good standard of accommodation, in terms of unit sizes, aspect and amenity space provision, being provided. Given the distance and orientation to the nearest residential properties, the proposal would not appear visually overbearing or result in any significant material impact in terms of outlook, overlooking, loss of light and privacy to neighbouring residential properties.
- 24.5 Overall, the proposal will deliver the restoration and refurbishment of two important heritage assets, improving the character and appearance of the conservation area and setting of nearby listed buildings. The “less than substantial harm” that would be caused by the demolition of buildings 2 and 4 would be outweighed by the public benefits of the proposal set out above in accordance with paragraph 134 of the NPPF.
- 24.6 The proposed new and altered buildings on the site have been sensitively designed and would respect the character, context and the form and scale of neighbouring buildings and would sit comfortably within the streetscene and surrounding area.
- 24.7 The proposal would improve on the design of the appeal scheme preserving the character and appearance of the Primrose Hill Conservation Area and having no adverse impact on the setting of the Grade II* listed stationary winding engine vaults that are located under the railway to the north of the site.
- 24.8 As such, the proposal is considered to be acceptable and in accordance with Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, the NPPF and Regional Guidance, Core Strategy and Development policies and Camden Planning Guidance for the reasons noted above.

25. RECOMMENDATION

- 25.1 Planning Permission is recommended subject to a S106 Legal Agreement covering the following Heads of Terms:-
- Affordable housing

- Deferred Affordable Housing Contribution
- Construction/Demolition Management Plan
- Car-capped development
- Provision of wheelchair accessible units
- Local employment plan including 4 apprentices and a support fee of £6,000
- Highways contribution of £30,999.73
- BREEAM domestic refurbishment 'Very Good'
- BREEAM Refurbishment and Fit-Out 'Very Good' (with minimum sub-targets for Energy, Water and Materials)
- Energy efficiency and renewable energy plan
- Play Open space contribution of £52,394
- Environmental Improvement Contribution of £55,000

26. LEGAL COMMENTS

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

27. CONDITIONS

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:

Drawing Numbers

173_GA_-01 Rev E – Proposed Basement Floor Plan, 173_GA_00 Rev E – Proposed Ground Floor Plan, 173_GA_01 Rev E – Proposed First Floor Plan, 173_GA_02 Rev E – Proposed Second Floor Plan, 173_GA_03 Rev D – Proposed Third Floor Plan, 173_GA_04 Rev D – Proposed Fourth Floor Plan, 173_GA_05 Rev D – Proposed Fifth Floor Plan, 173_GA_ROOF Rev A – Proposed Roof Plan, 173_GE_00 Rev A – Proposed General Elevation, 173_GE_01 Rev A – Proposed General Elevation, 173_GE_02 Rev A – Proposed General Elevation, 173_GE_03 Rev A – Proposed General Elevation – 173_GE_04 Rev A – Proposed General Elevation in Context, 173_GS_00 Rev A – Proposed General Section, 173_GS_01 Rev A - Proposed General Section, 173_GS_02 Rev A - Proposed General Section, 173_GS_03 Rev A - Proposed General Section, 173_LA_00 Rev A – Proposed Landscape Plan, 173_LFT_00 Rev A – Proposed Lifetime Home Compliance Drawing – General Arrangement, 173_LFT_01 Rev A - Proposed Lifetime Home Compliance Drawing – General Arrangement, 173_WHC_00 Rev A – Proposed Wheelchair Adaptability Drawing, 173_BS_00 Rev A – Proposed Bay Study Details, 173_BS_01 Rev A – Proposed Bay Study Details, 173_BS_02 Rev A – Proposed Bay Study Details and 173_BS_03 Rev A – Proposed Bay Study Details.

Supporting Documents

Planning Statement, Design and Access Statement plus appendices, Acoustic Report, Sustainability Statement, Heritage Statement, Ecology Report and BREEAM Report, Tree Assessment, Sunlight and Daylight Report, Basement Impact Assessment including Ground Movement Survey, Transport Assessment, Travel Plan, Construction Management Plan, Air Quality Assessment, Energy Statement and Construction Logistics Plan.

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

3. No development of the relevant part shall commence until detailed drawings, or samples of materials as appropriate, in respect of the following, have been submitted to and approved in writing by the Local Planning Authority:
 - a) Plan, elevation and section drawings, including jambs, head and cill, of all new external windows and doors at a scale of 1:10 with typical glazing bar details at full size.
 - b) Typical details of new railings, balustrade and new gates at a scale of 1:10 with finials at full size, to include method of fixing.
 - c) Manufacturer's details of new facing materials including windows and door frames, metal cladding, gates, glazing, glazed link and balconies with a sample panel of not less than 1m by 1m demonstrating, the proposed colour, texture, face-bond and pointing of brickwork.
 - d) Section drawings showing protrusion of photovoltaic panels to the roof of Building 2 at a scale of 1:10 and samples of the new panels to be installed.
 - e) Samples of the materials and typical details to be used in the construction of the external surfaces of the extension to Building 1 (frontage building at 44 Gloucester Avenue) including sample panels of not less than 1m by 1m of all new facing brickwork demonstrating the proposed colour, texture, face-bond and pointing.

The relevant part of the development shall then be carried out only in accordance with the approved details and samples.

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. Before the development (other than site clearance and preparation, relocation of services, utilities and public infrastructure and demolition) commences, details of secure and covered cycle storage area for 68 cycle parking spaces for the residential part of the development and 8 cycle parking spaces for the office (Class B1a) part of the development shall be submitted to and approved by the local planning authority. The approved storage areas shall be provided in their entirety prior to the first occupation of any of the new units, and permanently retained thereafter.

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 policy DP17 of the London Borough of Camden Local Development Framework Development Policies.

5. The development hereby approved shall not commence until such time as 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 Council prior to the commencement of development. Any subsequent change or reappointment shall be confirmed forthwith for the duration of the construction works.

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 of the London Borough of Camden Local Development Framework Development Policies.

6. No lights, meter boxes, flues, vents or pipes, and no telecommunications equipment, alarm boxes, television aerials, satellite dishes or man-safe rails shall be fixed or installed on the external face of any of the buildings, 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 policy DP24 of the London Borough of Camden Local Development Framework Development Policies.

7. No development (other than site clearance and preparation, relocation of services, utilities and public infrastructure and demolition), shall take place until full details of hard and soft landscaping and means of enclosure of all un-built, open areas (including terraces, balconies and green roofs) have been submitted to and approved by the local planning authority in writing. Details shall include a phased programme of works. The relevant part of the works shall not be carried out otherwise than in accordance with the details and programme 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 policy 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.

8. 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 planting season following completion of the development or any phase of the development, prior

to the occupation for the permitted use of the development or any phase of the development, whichever is the sooner. 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 policy CS14 & CS15 of the London Borough of Camden Local Development Framework Core Strategy and policy DP24 of the London Borough of Camden Local Development Framework Development Policies.

9. The green roof hereby approved shall be provided prior to the first occupation of the development in accordance with the approved details and shall be permanently retained and maintained thereafter.

Reason: In order to ensure the development undertakes reasonable measures to take account of biodiversity and the water environment in accordance with policies CS13, CS15 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. Details of the proposed ventilation and extraction plant for the Class B1 premises, including details of sound attenuation for any necessary plant, shall be submitted to and approved in writing by the Local Planning Authority and the approved measures shall be implemented prior to occupation of the commercial units and shall be retained and maintained as such thereafter.

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.

11. Noise levels at a point 1 metre external to sensitive facades shall be at least 5dB(A) less than the existing background measurement (LA90), expressed in dB(A) when all plant/equipment (or any part of it) is in operation unless the plant/equipment hereby permitted will have a noise that has a distinguishable, discrete continuous note (whine, hiss, screech, hum) and/or if there are distinct impulses (bangs, clicks, clatters, thumps), then the noise levels from that piece of plant/equipment at any sensitive façade shall be at least 10dB(A) below the LA90, expressed in dB(A).

Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements 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.

12. Prior to commencement of the development, full details of the sustainable drainage system prioritising SUDS within the landscaping 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 greenfield run off rates if feasible or as a minimum a 50% reduction in run off rate. Details shall include a lifetime maintenance plan, and shall thereafter be retained and maintained in accordance with the approved details.

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 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.

13. Prior to occupation of the development, evidence that the sustainable drainage system has been implemented in accordance with the approved details as part of the development shall be submitted to the Local Authority and approved in writing. The systems shall thereafter be retained and maintained in accordance with the approved maintenance plan.

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 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.

14. At least 28 days before development commences (other than site clearance & preparation, relocation of services, utilities and public infrastructure, but prior to removal of any soil from the site),:

- (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 in writing; 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 shall be submitted to and approved by the local planning authority in writing.

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 in writing 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.

15. Prior to occupation of the development the refuse and recycling storage facilities intended for its occupiers as shown on the drawings hereby approved shall be provided. All refuse and recycling storage facilities shall be permanently maintained and retained thereafter.

Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policy CS18 of the London Borough of Camden LDF Core Strategy and DP26 of the London Borough of Camden LDF Development Policies.

16. Prior to occupation of the development full details of the following shall be submitted to and approved in writing by the Local Planning Authority:

- a) Affordable Housing refuse store
- b) Affordable Housing cycle store
- c) Market units refuse stores
- d) Market units cycle store

The relevant part of the development shall then be carried out only in accordance with the approved details and samples.

Reason: To ensure the development provides adequate refuse and cycle parking facilities in accordance with the requirements of policies CS11 and CS18 of the London Borough of Camden Local Development Framework Core Strategy and policies DP17 and DP26 of the London Borough of Camden Local Development Framework Development Policies.

17. All units hereby approved shall be designed and constructed in accordance with Building Regulations Part M 4 (2).

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.

18. Units G04, 108, 208 and 304 as indicated on the plans hereby approved shall be designed and constructed in accordance with Building Regulations Part M 4 (3) adaptable.

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.

19. Prior to the commencement of work on site, details of temporary and permanent works on site and a method statement and risk assessment in consultation with Network Rail shall be submitted to the local planning authority.

Reason: To ensure that the construction and subsequent maintenance of the proposal can be carried out without adversely affecting the safety, operational needs and integrity of the neighbouring railway land in accordance with the requirements of policy CS5 and CS13 of the London Borough of Camden Local Development Framework Core Strategy.

20. The access to the Grade II* listed stationary winding engine vaults shown on Drawings 173_GA_-01 Rev H and 173_GA_-00 Rev F hereby approved shall be provided prior to the occupation of the development and shall be permanently retained thereafter.

Reason: In order to safeguard the special architectural and historic interest of the listed vaults 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.

21. The development shall be carried out in accordance with the noise mitigation measures to ensure acceptable internal noise levels within the proposed residential units as set out in the Noise and Vibration Assessment by Sharps Redmore and no unit shall be occupied until the mitigation measures relevant to that unit have been installed.

Reason: To safeguard the amenities of the future occupants of the development in accordance with the requirements of policy CS6 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.

22. Prior to occupation of the development, a revised air quality assessment taking into consideration emissions from the railway line, and outlining any necessary mitigation measures shall be submitted to and approved in writing by the Local Planning Authority. The development shall be implemented and thereafter maintained in accordance with the approved details.

Reason: To safeguard the amenities of the future occupants of the development in accordance with the requirements of policy DP26 of the London Borough of Camden Local Development Framework Development Policies.

23. Prior to occupation of the development, details of the privacy screens to be fitted to the ground floor fenestration on the western elevation facing No.48 Gloucester Avenue and Sunny Mews shall be submitted to and approved in writing by the Local Planning Authority. The development shall be implemented and thereafter maintained in accordance with the approved details.

Reason: To safeguard the amenities of the future occupants of the development in accordance with the requirements of policy DP26 of the London Borough of Camden Local Development Framework Development Policies.

INFORMATIVES

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. 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.
3. You are reminded that filled refuse sacks shall not be deposited on the public footpath, or forecourt area until within half an hour of usual collection times. For further information please contact the Council's Environment Services (Rubbish Collection) on 020 7974 6914/5 or on the website <http://www.camden.gov.uk/ccm/content/contacts/councilcontacts/environment/contact-street-environment-services.en>.
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. This permission is granted without prejudice to the necessity of obtaining planning permission for any proposed extract/ventilation ducts or other plant such as air conditioning units.
7. 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 need to be 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

8. 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.
9. The correct street number or number and name must be displayed permanently on the premises in accordance with regulations made under Section 12 of the London Building (Amendments) Act 1939.
10. The developer must either submit evidence that the building was built post 2000 or provide an intrusive pre-demolition and refurbishment asbestos survey in accordance with HSG264 supported by an appropriate mitigation scheme to control risks to future occupiers. The scheme must be written by a suitably qualified person and shall be submitted to the Local Planning Authority (LPA) and must be approved prior to commencement of the development. The scheme as submitted shall demonstrably identify potential sources of asbestos contamination and detail removal or mitigation appropriate for the proposed end use. Detailed working methods are not required but the scheme of mitigation shall be independently verified to the satisfaction of the LPA prior to occupation.

44-44a Gloucester Avenue, London, NW1 8JD



Application: 2015/1243/P

Independent Review of Assessment of Economic Viability

17th May 2015

1.0 Introduction

- 1.1 We have been instructed by the London Borough of Camden to review a viability submission prepared by Montagu Evans on behalf of Victoria Square Property Company Limited ('the applicant') in respect of the proposed development at 44-44a Gloucester Avenue.
- 1.2 The site measures 0.2 hectares and is located in the Primrose Hill area of the London Borough of Camden. The site currently accommodates two buildings: No 44 Gloucester Avenue, which comprises a 3 - 3 ½ -storey detached building in B1 Office and B8 Storage use which is subdivided into a number of small units; and 44a Gloucester Avenue, which is located at the southern end of the site and comprises a two storey residential house which is currently vacant.
- 1.3 Planning permission was granted at appeal in March 2012 (Ref: APP/X5210/A/11/2161885) for the refurbishment of the existing buildings, and construction of 4 to 5 storey buildings to provide 15 dwellings and additional B1 Office space.
- 1.4 Prior approval was granted (2015/0462/P) in March 2015 for Change of Use from Office (B1) to Residential (C3) to provide 17 dwellings including the retention of the existing house under Permitted Development Rights.
- 1.5 The current application (2015/1243/P) proposes the following redevelopment of the site:

Demolition of existing buildings identified as number 2 at the northwest corner of the site to provide a new ground plus 5 upper storey building along the north west part of the site and a ground plus 2 upper storey building at the eastern corner and refurbishment of the existing building on site to create 40 residential units, employment floor area (Class B1a), car parking and landscaping within the courtyard and ancillary works.
- 1.6 The 40 proposed residential units consist of 15 one bedroom apartments, 19 two-bedroom apartments, including 6 duplexes, and 6 three-beds including 4 duplexes and 1 house. The proposed scheme also includes 698 m² (GIA) of B1(a) employment floorspace and 17 car parking spaces.

- 1.7 The 40 flats have a total area of 4,800 m² (GEA), which triggers an affordable housing requirement of 48% under The Council's planning policy DP3, equating to 2,304m². In the event that the affordable housing cannot be provided on site or on a site in the locality Camden Planning Guidance (CPG8) sets out how affordable housing payments-in-lieu should be calculated, by using a £2,650 per m² multiplier, applied to the area of the required on-site affordable housing. This results in a maximum payment-in-lieu of £6,105,600 when applied to this scheme.
- 1.8 The applicant's advisers offer as justification for an offer for an in lieu payment towards affordable housing rather than on site provision, the argument that a greater amount of affordable housing can be delivered via a commuted payment than via on-site provision. No alternative off site provision has as yet been offered.
- 1.9 The applicant is offering a payment in lieu of on-site affordable housing of £3,792,572. Montagu Evans' viability assessment concludes that this figure represents the maximum contribution that can be supported without making the scheme unviable.
- 1.10 Our review has sought to scrutinise the costs and value assumptions that have been applied in Montagu Evans' viability assessment in order to determine whether the current level of affordable housing offer represents the maximum level that can reasonably be provided.

2.0 Conclusions & Recommendations

- 2.1 Based on our review of the viability submission, we are of the view that the scheme can provide additional financial contributions towards affordable housing above the proposed payment of £3.79m. The primary reason for this conclusion is that we regard the proposed benchmark land value as overstated and also likely to be undeliverable in the context of the current deadlines for delivery of conversion schemes allowed for under permitted development rights. Based on our calculations and adoption of an existing use value based benchmark the scheme is capable of delivering a fully policy compliant level of payment.
- 2.2 The applicant's argument that better value for money could be achieved through provision of an in lieu payment rather than on site delivery of affordable housing does not reflect the Council's planning policies which clearly prioritise on site delivery and do not provide for value for money arguments in this context. Although the applicant's report suggests opportunities for off-site delivery are under consideration no actual proposals for such are included.
- 2.3 The application submission indicates that if on site delivery is required this would only be in the form of shared ownership due to limitations imposed by the scheme design.
- 2.4 Considering the clear policy requirements for on-site affordable housing delivery and the lack of justification provided by Montagu Evans both in its capacity as planning advisor and viability consultant for an in lieu payment, we remain to be convinced that on-site affordable housing delivery is not a feasible option.
- 2.5 The residual value of the proposed scheme is £13.64m in Montagu Evans' appraisal, which incorporates the proposed £3.79m commuted payment as a development cost. This residual value has been compared against a benchmark of £13.64m which is based on the residual value estimated to be delivered by implementation of the Permitted Development Rights (PDR) scheme (2015/0462/P) to convert the property to residual use, together with a 15% landowner premium.
- 2.6 We are of the view that the residual value of the PDR scheme is overstated through marginally over-valuing the residential units and underestimating the likely conversion costs and by factoring in an excessive landowner premium. We also remain to be convinced that it can be delivered within the time-frame of May 2016 which raises questions regarding its validity as a realistic basis for benchmarking viability.
- 2.7 We have estimated the site's benchmark land value using an Existing Use Value (EUV) approach, and have included a 10% premium to reach a benchmark of £6.73m.
- 2.8 Applying our suggested EUV benchmark of £6.73m to the scheme residual value of £13.64m generates an apparent surplus of £6.9m after allowing for profit and the proposed in lieu payment of £3.79m. Therefore we are of the view that there is ample scope to bridge the shortfall of £2.31m on a fully policy

compliant payment. We have not modelled options for on-site delivery as the scheme has not been designed to accommodate mixed tenure.

- 2.9 We are otherwise satisfied that the costs, values and profit target for the proposed scheme are in line with market norms.

3.0 Planning Policy Considerations

- 3.1 We have had reference to National Planning Policy including the National Planning Policy Framework. We have also had regard to the local planning policy context including the London Plan's (2011) Housing Policies and the Council's Core Strategy.
- 3.2 Core Strategy policy CS6 sets a target mix of 60% social rented and 40% intermediate tenure for affordable housing provision within the Borough.
- 3.3 DP3 states that affordable housing contributions will be expected from all residential developments with a capacity to provide 10 or more dwellings, with a 50% negotiating target being applied on a sliding scale, from 10% for schemes with a capacity of 10 dwellings to 50% for those of 50 dwellings. The 50% target operates subject to the financial viability of the development.
- 3.4 The applicant suggests that the proposed scheme should not provide any onsite affordable housing because the *'specifics of the scheme dictate that substantially more affordable housing could be provided off site than could be provided on site'*.
- 3.5 The proposed scheme will provide 40 flats totalling 4,800 m² (GEA), which triggers an affordable housing requirement of 48% under DP3, equating to 2,304m².
- 3.6 Camden Planning Guidance (CPG8) sets out how affordable housing payments-in-lieu should be calculated, by using a £2,650 per m² multiplier, applied to the area of the required on-site affordable housing. This results in a maximum payment-in-lieu of £6,105,600 when applied to this scheme.
- 3.7 Policy 3.12 of the London Plan - Negotiating Affordable Housing on Individual Private Residential and Mixed use Schemes¹ makes the following statement:

C Affordable housing should normally be provided on-site. In exceptional cases where it can be demonstrated robustly that this is not appropriate in terms of the policies in this Plan, it may be provided off-site. A cash in lieu contribution should only be accepted where this would have demonstrable benefits in furthering the affordable housing and other policies in this Plan and should be ring-fenced

- 3.8 The Council wrote to the applicant in a letter dated 30 January 2014 concerning the proposal for off-site provision. The following extract summarises the advice provided by the Council to the applicant:

The proposals include an off-site provision of affordable housing, it is not clear if this would be a financial contribution or units provided elsewhere. This is not something that would be supported on this site. The previous application has demonstrated that it is practical and possible for affordable housing to be provided on site, which is the Council's preference, as outlined in DP3.

¹ London Plan March 2015

Furthermore the previous application provided a quantum of affordable housing in line with the Council's policies, thereby establishing that it is possible for affordable housing to be provided on site and to the level required by the Council's policies.

In addition, given the layout of the site it would be able to accommodate the provision of on-site affordable housing without prohibiting the provision of market housing. I would advise you consider paragraph 3.14 of DP3 together with chapter 2 of CPG2.

- 3.9 Camden Development Policy DP3 states, *"The Council will expect the affordable housing contribution to be made on site, but where it cannot practically be achieved on site, the Council may accept off-site affordable housing, or exceptionally a payment-in-lieu"*.
- 3.10 The Council requires any affordable housing contribution to be via on-site delivery unless it can be demonstrated that on-site provision is impracticable. The applicant suggests that the proposed scheme should not provide any onsite affordable housing because the *"specifics of the scheme dictate that substantially more affordable housing could be provided off site than could be provided on site"*. It is our understanding that this is not a sufficient justification for waiving the Council's on-site affordable housing requirement, as it is clear that on-site is the required form of delivery unless it can be demonstrated that on-site is undeliverable.
- 3.11 CPG2 states that, *"Affordable housing should generally be provided on site"*, and continues,

Development Policy DP1 indicates that housing contributions should normally be provided on site, while Development Policy DP3 indicates that affordable housing contributions should normally be made on site.....

.....The Council will only accept off-site contributions where provision cannot practically be achieved on-site. The Council will only accept contributions in the form of payments-in-lieu in exceptional circumstances.

....Off-site contributions are most likely to be acceptable for small sites, whereas the Council will expect contributions to be made on-site where the development is larger.

- 3.12 Montagu Evans advise in their viability report that their Affordable Housing team has concluded that on site provision would result in delivery of around 8 shared ownership units each of which would require in the order of £500,000 per unit subsidy which in their view represents poor value for money. Montagu Evans indicate that they are undertaking discussions with Registered Providers to explore options for affordable housing delivery elsewhere in the borough that would be able to deliver "more appropriate housing". No further details are provided in this respect.
- 3.13 We conclude that on the basis of local and regional planning policy requirements for on -site delivery, Camden Planning Officers specific advice to the applicant

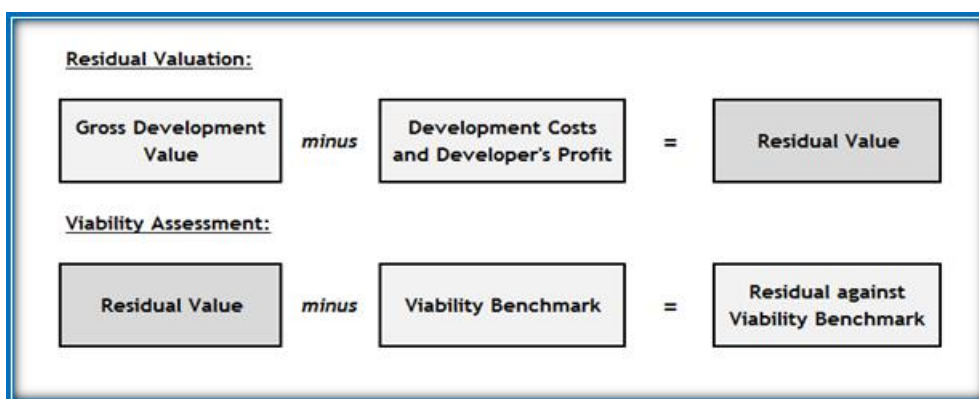
confirming the ability the of the site to accommodate on-site delivery, the lack of appraisals considering on-site provision and lack of any apparent plans to deliver affordable housing off-site the applicant has not yet fully demonstrated that affordable housing cannot feasibly be delivered on-site.

4.0 Planning History

- 5.1 2005/1404/P - Planning permission was granted in June 2005 relating to 44a for 'alterations and conversion including rear basement extension and associated work to provide 2 self-contained residential units, and boundary treatment.'
- 5.2 2009/5659/P & 2009/5661/C - This application was withdrawn but sought permission for the 'erection of new building to provide 25 residential units (10x1bedroom flats, 10x2bedroom flats, 5x3bedroom flat) (Class C3) and 16 non residential units (Class B1a)
- 5.3 2010/6627/P & 2010/6629/C - Planning permission was finally granted at appeal in March 2012 (Ref: APP/X5210/A/11/2161885) for the 'Re-development of the site by refurbishment of existing buildings and erection of new 4 and 5 storey buildings at the northwest corner of the site and new 3 storey building at the easting corner (following demolition of existing) to create 15 new residential units (Class C3) and additional office floor space (Class B1)
- 5.4 2014/7043/P - This application was withdrawn but outlined a proposed 'change of use from office use (Class B1) to provide 1x1 bed & 17x 2 bed residential units (Class C3)'
- 5.5 2015/0462/P - Prior approval was granted subject to Section 106 legal agreement in March 2015 for 'change of use from office (B1) to residential (C3) to provide 1x1 bedroom and 16 x 2 bedroom residential units with retention of existing house

5.0 Principles of Viability Assessment

- 5.1 Assessment of viability for planning purposes is based on the principle that if a proposed scheme cannot generate a value that equals or exceeds the current site value, it will not proceed. Financial viability for planning purposes is defined by the RICS Guidance 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.
- 5.2 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.
- 5.3 Existing Use Value has been generally recognised by many LPA’s and the GLA as the standard recognised basis for establishing viability as it clearly defines the uplift arising from the grant of the planning consent sought and is currently referred to as the preferred basis for benchmarking schemes in the Council’s recently adopted planning policies.
- 5.4 RICS Guidance² 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.
- 5.5 In this context it is highly relevant to consider the degree to which planning policy has been reflected in the land transactions promoted and whether they are themselves considered to represent market value as distinct from overbids.
- 5.6 Viability appraisals work to derive a residual value to indicate viability. This approach can be represented by the simple formula set out below:



² RICS, Financial Viability in Planning, 1st Edition Guidance Note, August 2012

- 5.7 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.
- 5.8 Residual appraisals are used either to assess a return from the proposed project (where the cost of acquiring the site is an appraisal input) or to establish a residual land value after taking account of the level or return (profit) required.
- 5.9 A scheme's residual value is then compared to the site value benchmark figure and if the residual value equals or exceeds this benchmark then the scheme can be said to be viable. It is therefore important in assessing viability for the site value benchmark ("base value") to be set at a figure which can be substantiated.

6.0 Viability Benchmark

Benchmark Land Value

- 6.1 Montagu Evans has sought to benchmark scheme viability by reference to the approved permitted development rights scheme (PDR). We consider this represents an alternative use valuation as this scheme has not been implemented but one for which a valid consent exists.
- 6.2 Given the requirement to complete PDR schemes by May 2016 it becomes increasingly questionable as to whether such a scheme could be delivered in the available time frame. Against this consideration we have also considered other potentially suitable benchmark values in this section including existing use and the extant planning consent granted at appeal. Given the typical 3 year life of a planning consent we assume the applicant has protected this consent through having implemented as it would otherwise have lapsed.

Permitted Development Scheme -

- 6.3 In May 2013 the Government altered permitted development rights to allow a change of use of a building from office to residential without the need to obtain planning permission. The residential use must start by 30th May 2016 i.e. the conversion works must be completed within this timeframe. It is uncertain whether these rights will be extended past 30th May 2016, and the latest legislation, Town & Country Planning (GDP) Order 2015 (which consolidated all previous amendments to permitted development rights), does not currently extend these rights. At present therefore there is no reason to assume that these rights will be extended.
- 6.4 We have considered whether it is realistic for the PDR scheme to be completed prior to the 30th May 2016 deadline. Our Cost Consultant, Neil Powling, advises that in order to deliver the project the applicant would need to produce detailed construction plans, then procure contractor, then almost certainly need to wait for the appointed contractor to start on site. Neil is of the view that a

full lead in period would be required and then a full build period given the current condition of the property.

- 6.5 Montagu Evans estimates a 3 month lead in and 15 month construction period, which indicates that the earliest that this scheme could be completed is the end of October 2016. The potential of the scheme being completed before the permitted development deadline of May 2016 is therefore unrealistic. In this case an alternative benchmark scheme should be considered.
- 6.6 Our Cost Consultant has calculated, using the BCIS construction period calculator, a 56 week period construction period for the PDR scheme. BCIS gives a range of 47 to 66 weeks. Given the age and condition of the buildings, there is the potential for the construction period to exceed BCIS averages due to the complexities that a conversion of such a period building would involve. Neil is of the view that a minimum lead-in (pre-construction) period of 6 month is required. We understand that plans for the PDR scheme have been submitted as part of the PDR application. The scheme would still, however, need to be worked up into detailed construction plans suitable for tendering purposes.
- 6.7 A 52 week construction period and 26 week pre-construction period gives a total development period of 78 weeks, 18 months, which would take the development well past the PDR deadline.
- 6.8 Given the delivery risks posed by the impending deadline, we suggest an increase to the profit requirement of the PDR scheme would also be suitable to reflect the pressures on the contractor and developer to meet these timescales. We would also expect the timescales to have implications for funding and potentially limit the market for purchasers of such schemes.
- 6.9 Given both Montagu Evans assessment and our own we are of the view that the only practical means for delivering the PDR scheme would be through an extension of the current timescales. This calls into question its suitability as an appropriate benchmark.

Permitted Development Scheme - discussion of appraisal inputs

- 6.10 The residual land value generated by Montague Evans appraisal of the PDR scheme is £11,86m, to which a 15% landowner premium has been added resulting in a proposed Viability Benchmark of £13.64 m.
- 6.11 The PDR scheme involves the conversion of the existing office (Use Class B1a) floorspace into 17 residential units, comprising 1 one-bedroom unit and 16 two-bedroom units and the retention of the existing dwelling house and B8 space.
- 6.12 We have considered the existing buildings and are of the view that they could provide some reasonable quality accommodation but the condition of these buildings is questionable as is the level of costs associated with providing these residential uses.

- 6.13 The sales values in the permitted development scheme reflect an average value of [redacted] per ft² (m²) which is slightly lower than that of the proposed scheme. The proposed values are summarised below:

Type	Count	Size m ² (ft ²)	Average Price	£ per m ² (ft ²)
1 Bed flat	1	(58) 623	[redacted]	[redacted]
2 Bed flat	16	(92) 993		
3 Bed house	1	(137) 1,472	[redacted]	[redacted]
Average				

- 6.14 The PDR scheme is constrained in the sense that the current buildings must be retained and as such the addition of features such as winter gardens and balconies, which are included in the proposed scheme, is much restricted, so we would expect achievable sales values to be below those adopted for the proposed scheme.
- 6.15 On balance we are of the view that the PDR units are slightly overpriced when compared to local comparable evidence (see section 8). Given that these units will not have terraces, winter gardens or balconies we would expect to see a reduction in achievable values. In light of this consideration we are of the opinion that a 5% reduction in average values is appropriate representing an average of [redacted].
- 6.16 It remains to be seen how effective and economical the retained B8 space would prove to be. Storage and distribution uses set around residential units could cause potential conflicts possibly limiting interest from potential occupiers.
- 6.17 We note that, according to the Planning Statement, there is currently 805m² of B8 storage space on site and of this over 55% is either 'not in lettable state' or 'dilapidated' and as such is vacant and classed as 'unusable'. However, there would appear to be no provision in the appraisal for the refurbishment of this space. We are of the opinion that there should be an allowance for the refurbishment of this space in order to avoid it impacting on the rest of the property. We suggest that a refurbishment cost rate of £65 per m² (£6 per ft²) is suitable, which is based on BCIS averages.
- 6.18 The proposed commercial space in the prior approval scheme has been valued at [redacted] per m² ([redacted] per ft²), which assumes that about 80% of the floor space is usable. The proposed rent has been capitalised at a yield of [redacted] with after allowing a 6 month rent free period for voids and lettings incentives.
- 6.19 We have not been provided with a Cost Plan for the PDR scheme. Our Cost Consultant, Neil Powling FRICS, notes that the rate per m² adopted by Montagu Evans is considerably less than the rate for the proposed scheme. But he does, however, consider these conversion costs to be realistic and in line with BCIS rates. Nevertheless, given the apparently poor condition of the buildings there is significant potential for the costs to exceed BCIS rates. We therefore consider it important to have further detailed information regarding the buildings' condition to be able to assess the likely impact on costs this may have.

- 6.20 There are 9 car parking spaces in the permitted development scheme and these, as in the proposed appraisal, have been valued at each, which gives total revenue of m. This rate per space is considerably higher than we have previously seen in this area of Camden. We consider that spaces are more typically valued in the region of £30,000. In order to give credence to Montagu Evans assumption we consider it reasonable to be provided with relevant sales evidence to support this assumption. In the absence of such evidence we remain to be convinced that this figure is appropriate.
- 6.21 In Appendix Two we identify circumstances where car parking values of £50,000-£75,000 are achievable and note these reflect the most prestigious residential schemes in the most valuable locations in Central London. Consequently we question whether these values can be reached in Camden Town.

Landowner Premium

- 6.22 A landowner premium of 15% has been added to the residual value of the prior appraisal scheme. Although the NPPF indicates that appraisals should allow for a commercial return to the land owner and developer we question whether a premium is implicit within a commercial return from this property.
- 6.23 The PDR AUV scheme entails considerable risk and investment to deliver the enhanced land value indicated by the appraisal of this scheme within the permitted timescales. This value is only accessible through incurring these risks and making this investment. By comparison existing use value already exists without incurring any risk or the need for further investment. Consequently the achievement of land value in each of these scenarios is not identical. In accepting an AUV generated value there is an inherent premium through accepting delivery of the land value without the need for the land owner to incur the risk or investment otherwise needed to secure it. Therefore adding a further premium to this value is to our view excessive and beyond what a prudent investor would consider reasonable. Adopting the AUV land value effectively de-risks this land value entirely which we consider to be a major concession and an adequate premium.
- 6.24 The principle of a premium derives from Paragraph 173 of the NPPF as quoted below:
- “To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.”*
- 6.25 This requirement is normally interpreted as the land owner receiving a proportion of the uplift in value generated by the consent being sought over the value of the existing interest.

- 6.26 RICS Guidance Note Financial Viability in Planning refers explicitly to the application of a premium to EUV but does not refer to AUV (para 3.4.1), and it also mentions (para 3.4.9) that when an AUV is estimated, this figure will equate to Market Value which by definition does not require an additional premium to be added to it in order to incentivise the landowner to sell. Indeed there is no higher value than market value.
- 6.27 The following paragraphs from the National Planning Practice Guidance deals with the issue of suitable incentives for landowners:

“The National Planning Policy Framework states that viability should consider ‘competitive returns to a willing landowner and willing developer to enable the development to be deliverable.’ This return will vary significantly between projects to reflect the size and risk profile of the development and the risks to the project.

“A competitive return for the land owner is the price at which a reasonable land owner would be willing to sell their land for the development. The price will need to provide an incentive for the land owner to sell in comparison with the other options available. Those options may include the current use value of the land or its value for a realistic alternative use that complies with planning policy.”

- 6.28 In this case given that the property is currently vacant it could be argued that a premium is not necessary because the current owner faced with costs involved in holding vacant property would need no further incentive to develop the site than a desire to reduce current outgoings which could not easily be mitigated without redevelopment.
- 6.29 If a premium is to be included we see no reason why it should exceed 10%.

Existing Use Value

- 6.30 Given the doubts over delivering the PDR scheme we have created an appraisal of the existing uses on site in order to provide an alternative benchmark.
- 6.31 The existing use value (EUV) of the property could be calculated by capitalising the rental income generated by the property. We are aware that the site is currently vacant. Some of this vacant space has been referred to by Montague Evans as being in an ‘unusable’ condition, and we have taken this into account in our valuation.
- 6.32 We have undertaken an investment valuation by using an office rental of £22.50 per ft² (£240 m²). This is slightly below the level outlined in the Montagu Evans’ viability assessment and reflects the lack of refurbishment. We have applied a 30% discount to the basement and £10 per ft² (£107 m²) for the B8 Storage space. All floor areas are taken from the February 2015 Planning Statement. We have also assumed that refurbishment work would have to take place on the ‘unusable’ space, and have used BCIS general office rehabilitation rates rebased by using a Camden location factor. The figure we have applied is

the lowest indicated rate of £65 per m2 (£6 per ft2). We have assumed a 15 month void allowance and rent free period.

BPS Existing Use Valuation

	Area (sqm)	Area (sqft)	Rent per sqft	Values
B1 Office - Upper Levels	1,800	19,375	£22.50	£435,938
B1 Offices - Basement	129	1,389	£16	£21,870
				£457,808
B8 Space - Upper Levels	644	6,932	£10	£69,320
		Yield		£457,808
		6.50%		
		Discount rate		£7,043,199
Deferred 1 1/4 year (6 month rent free + 9 month average void)		0.9243		£6,510,029
		Area (sqft)	Cost per sqft	
Refurbishment costs of unusable space		5,737	£6	34,644
		Gross Capital Value		£6,475,385
		Purchaser's Costs @ 5.8%		£354,983
		Net Capital Value		£6,120,402

- 6.33 We have assumed that the majority of the building is in a lettable condition, albeit offering a relatively poor standard, reflecting the comments included in the Planning Statement and despite the fact that the premises have been vacant since May 2013.
- 6.34 We are therefore of the opinion that the EUV of the site in its current condition is £6,120,000. It should be noted that we have not inspected the building and as such our refurbishment estimate could significantly underestimate the actual costs required to bring the unusable space to a reasonable lettable standard.
- 6.35 We have added a landowner premium of 10% which results in a benchmark value of £6,732,442.

Alternative Use Value - Extant Consent

- 6.36 We are of the opinion that the extant permission (ref: 2010/6627/P) would be a more suitable AUV than the PDR scheme and that if the applicant wishes to use an AUV then the extant permission development should be examined in further detail. Given this consent was granted in excess of three years ago there is a question as to whether this consent has been implemented or has effectively lapsed.

Summary

- 6.37 We are of the opinion that the proposed benchmark land value is overstated at £13.64 m. We remain to be convinced that the costs associated with the PDR scheme are suitable given the apparent external condition of the building and the intimated condition of the interior. We also question the suitability of a mix of residential and B8 space, and hence the ability of this scheme to deliver quality housing.
- 6.38 We also dispute the need for a landowner premium in the case of the PDR scheme. Based on our analysis of this appraisal's inputs we concluded the following:
- The residential units appear overpriced, and we are of the opinion that c5% lower average values are suitable.
 - Proposed parking values of per space (giving a total of m are considerably higher than we have seen previously in this area of Camden and regard £30,000 per space as more typical.
 - Higher conversion costs could potentially be required given the buildings' poor condition.
- 6.39 Changes to these key inputs could clearly have a major negative impact on the residual value. Moreover, given the deadline of 30th May 2016 for the completion of permitted development (Prior Approval') schemes, we question whether the PDR scheme is deliverable and therefore question whether it is a suitable basis for establishing a benchmark land value. We have therefore examined an alternative approach to determining the benchmark based on the site's Existing Use Value (EUUV). We conclude that a figure of £6,732,442 would be reasonable on this basis.
- 6.40 We note that there is a consent (Ref: APP/X5210/A/11/2161885) which could potentially be used as an Alternative Use Value (AUV) for the purposes of establishing a benchmark subject to it not having lapsed. However, we understand that this option has not yet been explored by the applicant's advisers and without further information we have not ourselves given this further consideration at this stage.

7.0 Private Residential Sales Values

- 7.1 The 40 proposed residential units have an estimated total sales value of . The average sales values by unit type are as follows:

Type	Count	Average Size	Average Price	£ per m ² (ft ²)
1 Bed	15	56 (602)		
2 Bed	19	82 (882)		
3 Bed Flats	5	118 (1,270)		
3 Bed House	1	262 (2,819)		

7.2 This proposed development is situated in the highly sought after area of Primrose Hill. We would expect that new units in this location would sell readily and for a comparatively high values for the borough as a whole . A number of the units in the proposed scheme benefit from private balconies and winter gardens.

7.3 Montague Evans has provided sales evidence from a number of comparable developments in order to support the values applied to the proposed scheme and also the permitted development scheme.

7.4 The Murphy Homes scheme on Delancey Street, known as Solstice Point, is to the southeast of the subject site, heading away from Primrose Hill. It is on a smaller scale than the proposed scheme comprising 16 units in total, two of which are townhouses. The units at Solstice Point provide better access to public transport links than the proposed scheme and do not overlook the railway but they are however situated next to a busy road junction and are further from Primrose Hill. Balancing these considerations we agree that this scheme provides a good indication of the values that could be expected to be achieved by the proposed scheme.

7.5 Sales of apartments from Solstice Point achieved an average of £1,203 ft² (£12,950 m²) reflecting asking prices. The scheme was completed in November 2014.

7.6 The development at Lock House is not far from the proposed scheme and the asking prices of unsold units in the scheme are shown below:

Address	Bed	Size m ² (ft ²)	Price	£ per m ² (ft ²)
Lock House, Oval Road	2	68 (732)	£825,000	£12,131 (£1,127)
Lock House, Oval Road	1	50 (540)	£625,000	£12,450 (£1,157)
Lock House, Oval Road	1	48 (512)	£550,000	£11,458 (£1,074)
Lock House, Oval Road	1	46 (498)	£599,950	£12,969 (£1,205)
Average				£12,252 (£1,141)

7.7 The units at Lock House are being marketed as new build and would appear to be priced accordingly. Although they are situated on a busier main road the units at Lock House are situated closer to public transport links.

7.8 There are a number of recently refurbished units on the market at Darwin Court which we classify as good second hand stock.

Address	Bed	Size m ² (ft ²)	Price	£ per m
Darwin Court, NW1	3	220 (2,363)	£1,899,000	£8,651 (£804)
Darwin Court, NW1	2	93 (1,000)	£975,000	£10,495 (£975)
Darwin Court, NW1	3	109 (1,170)	£995,000	£9,154 (£850)
Darwin Court, NW1	2	114 (1,230)	£1,100,000	£9,626 (£894)
Average				£9,482 (£881)

7.9 We have also collated the following further information on second hand properties that have sold in the locality within the last year which support the values proposed by Montagu Evans applied in the appraisal.

Address	Asking Price	Date	Beds	Size M ² (ft ²)	£ per m ² (£ per ft ²)
Flat 38 Darwin Court, NW1	£1,000,000	29/08/14	2	104 (1,119)	£9,615 (£893)
Grd Flr Flat 43 Gloucester Avenue, NW1	£965,000	23/05/14	2	84 (904)	£11,488 (£1,067)
Flat 75 Gilbey House, NW1	£1,300,000	30/01/15	3	126 (1,356)	£10,317 (£959)
Flat 52 Gloucester Avenue, NW1	£1,070,000	20/08/14	2	89 (958)	£12,022 (£1,117)
Flat 13 Lock House, Oval Road, NW1	£500,000	11/07/14	1	47 (506)	£10,638 (£988)
Flat 4 Darwin Court, NW1	£975,000	18/12/14	2	88 (947)	£11,080 (£1,029)

7.10 The sales evidence provided by Montague Evans and our own research appear to support Montagu Evans proposed sales values. See 6.15 above for our comments in relation to the pricing applied to the units within the PDR scheme.

8.0 Capitalised Ground Rents

8.1 The appraisals have included revenue from annual ground rents for both the permitted development and proposed schemes. This has been calculated on the assumption of a rent of per unit capitalised at a yield of . These assumptions are broadly in line with our expectations for ground rents in this area.

9.0 Commercial Values

9.1 The commercial element in the proposed scheme has been valued at a rental of with a discounted rate (of headline rent) applied to the basement space. The resulting blended average rent is per m²). This rent has been capitalised at a yield of with a 6 month deferment for a rent free period. The capital value after purchaser cost is

9.2 There are a limited number of local transactions that have taken place in the last 12 months, the limited data available would suggest that the figures used in

the Montague Evans appraisals are broadly reasonable. A summary of relevant transactions is shown below:

Address	Date	Use type	Size m ² (ft ²)	Rent	£ per m ² (ft ²)
3rd floor, 187-191 Royal College Street, NW1 OSG	01/03/15	Office (B1a)	58 (624)	£14,090	£243 (£23)
1st, 13-15 Rosemont Road, NW3 6NG	01/12/14	Office (B1a)	65 (700)	£18,500	£284 (£26)
1st, Regis Road, London, NW5 3EW	31/10/14	Office (B1a)	324 (3,487)	£69,740	£215 (£20)
6 Camden High Street Camden London Inner London NW1 0JH	01/07/14	(B1a) Office	396 (4,263)	£123,714	£312 (£29)

10.0 Construction Costs

- 10.1 Our Cost Consultant, Neil Powling, has reviewed the cost plan for the application scheme, and in summary he is of the opinion that the construction costs are reasonable. Neil's full report can be found at appendix A.
- 10.2 A developer's profit target of 20% has been applied to the gross development value (GDV). Industry norms suggest rates of 17-20% indicating the target figure is at the upper end of the range.
- 10.3 Professional Fees have been applied at 12% of build costs which is not unreasonable for a scheme of this nature.
- 10.4 Sales agent fees of 1% and sales legal fees 0.5% have been applied in the appraisal and we agree that these are broadly in line with market norms.
- 10.5 Marketing fees of 1%, letting agent's fees of 10% and letting legal fees of 5% are broadly in line with typical values we would expect.
- 10.6 An interest rate of 7% has been applied and we agree that this reflects rates typically seen in the current market.

BPS Chartered Surveyors

Project: 44-44A Gloucester Avenue, NW1 8JD
2015/1243/P

Independent Review of Assessment of Economic Viability

Interim Draft Report Appendix A Cost Report

1 SUMMARY

- 1.1 Our adjusted benchmarking using the blended rate derived in paragraph 3.4 allowing for abnormal costs and enhanced specification demonstrates that the Applicant's estimated costs are reasonable.

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 been 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 letter from Montagu Evans dated 31st March 2015 headed Financial Viability Assessment including its appendices and in particular Appendix 2 the Preliminary Budget Estimate Nr 1 prepared by BTP dated March 2015 in the total sum of
- 3.2 We have also downloaded additional information including drawing of the existing building and the proposed scheme from the planning website.
- 3.3 The estimate has been prepared in reasonable detail generally in BCIS elemental format that has enabled us to prepare the attached file "Elemental analysis and BCIS benchmarking". The proposed scheme includes both residential flats and commercial space each involving new build and refurbishment space. No distinction has been made in the estimate and we have based our benchmarking on the following split of the Gross Internal Area (GIA).

3.4	Blended calculation			BCIS	Blended
		m ²	%	£/m ²	£/m ²
	New flats	2,390	51%	1,757	890
	Refurbish/ convert flats	1,632	35%	1,634	565

New office	244	5%	1,666	86
Refurbish/ convert office	454	10%	1,083	104
	<u>4,720</u>	<u>100%</u>		<u>1,645</u>

- 3.5 We have downloaded current information for benchmarking purposes including a location factor for Camden of 117 that has been applied in our calculations.
- 3.6 BTP have added a combined addition of 22% for preliminaries and overheads and profit (OHP). We consider about 16% for preliminaries and 6% for OHP to be at the upper end of the range we would expect. A further allowance (after all other additions) of has been made for working alongside the railway line. This item might frequently be included as an additional preliminaries item. We have treated this sum as an abnormal cost for benchmarking purposes.
- 3.7 The addition for contingency equates to 4.1%. We consider this a reasonable allowance.
- 3.8 Our adjusted benchmarking using the blended rate from 3.4 above allowing for abnormal costs and enhanced specification demonstrates that the Applicant's estimated costs are reasonable.

BPS Chartered Surveyors
Date: 1st May 2015

Appendix Two: Car parking values

Car Parking in New Developments								
The table below sets out the quantum or parking available in Prime Central London residential developments.								
Scheme	Address	Borough	Units	£psf	Parking Spaces	Ratio	Cost	Description
The Lancasters	75-89 Lancaster Gate, W2 3NN	Westminster	77	£2,750	91	118%	£150,000	Valet parking / dedicated spaces
The Knightsbridge	199 Knightsbridge, SW7 1RH	Westminster	205	£4,000	300	146%	Now inc. In price of re-sales	Valet parking / dedicated spaces
Holland Green	224-238 Kensington High Street, W8 6NQ	Royal Borough of Kensington and Chelsea	62	TBC	69	111%	TBC	
The Atrium	127-131 Park Road, NW8 7JB	Westminster	27	£2,000	40	148%	Included in the price	
2 Hyde Park Square	2 Hyde Park Square, W2 2JY	Westminster	36	£1,850	23	64%	£95,000	Right to park. Allocated numbered space.
Fitzroy Place	2-10 Mortimer Street, W1W 7EY	Westminster	237	£1,700	193	81%	£95,000	Right to park. Allocated numbered space.
375 Kensington High Street	375 Kensington High Street, W14 8QT	Royal Borough of Kensington and Chelsea	467	£1,650	309	66%	£50,000	Right to park (non-allocated), self-parking, penthouses allocated a tandem space
One Tower Bridge	Lambeth College Coach Park, Tower Bridge Road Queen Elizabeth Street, SE1 3LS	Southwark	355	£1,490	142	40%	£80,000 - £100,000	
Newman Street	23-24 Newman Street, W1T 1PJ	Westminster	16	£1,450	2	13%	£75,000	For the penthouse only
Wellington House	67-73 Buckingham Gate, SW1E 6BE	Westminster	59	£1,450	19	32%	£75,000	Allocated on 999 year lease, self-parking
Neo Bankside	118-122 Southwark Street, SE1 0SW	Southwark	217	£1,450	92	42%	£80,000	Allocated numbered parking space, self-parking
The Heron	Silk Street, EC2Y 9BJ	City of London	284	£1,450	TBC		£50,000	Valet parking
Central St Giles	1-13 St Giles High Street, WC2H 8LB	London Borough of Camden	56	£1,425	10	18%	£100,000	Allocated space, self-parking. High proportion when compared to large units (there were only 7 x 3 bed units).
Bramah, Grosvenor Waterside	Grosvenor Road, SW1V 4BE	Westminster	103	£1,350	58	56%	£50,000 - £80,000	Allocated space, written into lease
Chelsea Apartments	Hortensia Road, SW10 0QP	Royal Borough of Kensington and Chelsea	45	£1,200	70	156%	£60,000	Allocated parking, written into lease, 2 level basement parking with access supervised by concierge
Chelsea Creek	Lots Road, SW10 0RN	Royal Borough of Kensington and Chelsea	504	£1,100	507	101%	£30,000	Right to park, unallocated spaces, self-parking
Embassy Gardens	1-12 Ponton Road 51 Nine Elms Lane, SW8 5AT	Wandsworth	1683	£950 - £1000	395	23%	£50,000	Right to park, with valet service.
Pan Peninsula	70 Marsh Wall, E14 9SL	Tower Hamlets	736	£850	251	34%	£40,000	Basement level vertical 2 car stack system. Valet parking
Riverside Quarter	Point Pleasant, Osiers Road, SW18 1NN	Wandsworth	308	£765	467	152%	£25,000	RTP, Allocated parking spaces, self-parking
New Providence Wharf	Blackwall Way, E14 9PJ	Tower Hamlets	556	£760	444	80%	£25,000	Subterranean 2 car vertical stackers. Valet parking.



44-44a Gloucester Avenue, London, NW1 8JD



Application: 2015/1243/P

Addendum Review of Viability

30 September 2015

1.0 Introduction

- 1.1 We have been instructed by the London Borough of Camden to review a viability submission prepared by Montagu Evans on behalf of Victoria Square Property Company Limited ('the applicant') in respect of the proposed development at 44-44a Gloucester Avenue.
- 1.2 We had previously concluded that the proposed off site affordable housing offer of £3,792,572 was insufficient and that a much higher offer could be made with the potential for onsite provision of affordable housing remaining an option given that several of the proposed units have the capability of having their own access and thereby avoid the issue of high service charges.
- 1.3 We had previously raised a number of concerns regarding a number of inputs into the Permitted Development scheme appraisal, used to benchmark the development, that were in our opinion inadequately justified and potentially open to challenge.
- 1.4 Our primary concern was that the residual value of the Permitted Development scheme was overstated. The benchmark proposed was reliant on estimated unit sales values being broadly similar to those generated by the proposed development despite apparent differences in unit design, amenity and internal specification.
- 1.5 We also expressed concern that under permitted development rights the conversion of the premises would need to be completed and the units occupied by May 2016 which we viewed as potentially unrealistic. We note however that contractors are on site and the internal strip out appears to be well under way so we accept this timescale remains feasible.
- 1.6 Whilst some of the concerns have not been directly addressed an improved affordable housing offer has been submitted as a means of meeting our overall concerns.
- 1.7 The current offer provides for onsite delivery of four rented tenure affordable housing representing 10% provision. The applicants have also accepted an outturn review mechanism with the potential to deliver a deferred payment of up to £4.68 million.

2.0 Conclusions & Recommendations

- 2.1 We are now satisfied that the affordable housing offer reflects an appropriate margin between the value generated by the Permitted Development scheme land value benchmark and the residual value generated by proposed scheme. Furthermore the offer of onsite provision addresses our concerns about the applicant's original intention to simply propose an off-site provision without regard to the policy requirement to secure on site provision.
- 2.2 Subject to confirmation that a Registered provider is willing to acquire the affordable units we are satisfied that this offer now represents the maximum provision available consistent with scheme viability.
- 2.3 The proposed on site rented units comprise three 2 bedroom units and one 3 bedroom unit.

3.0 Affordable Housing Provision

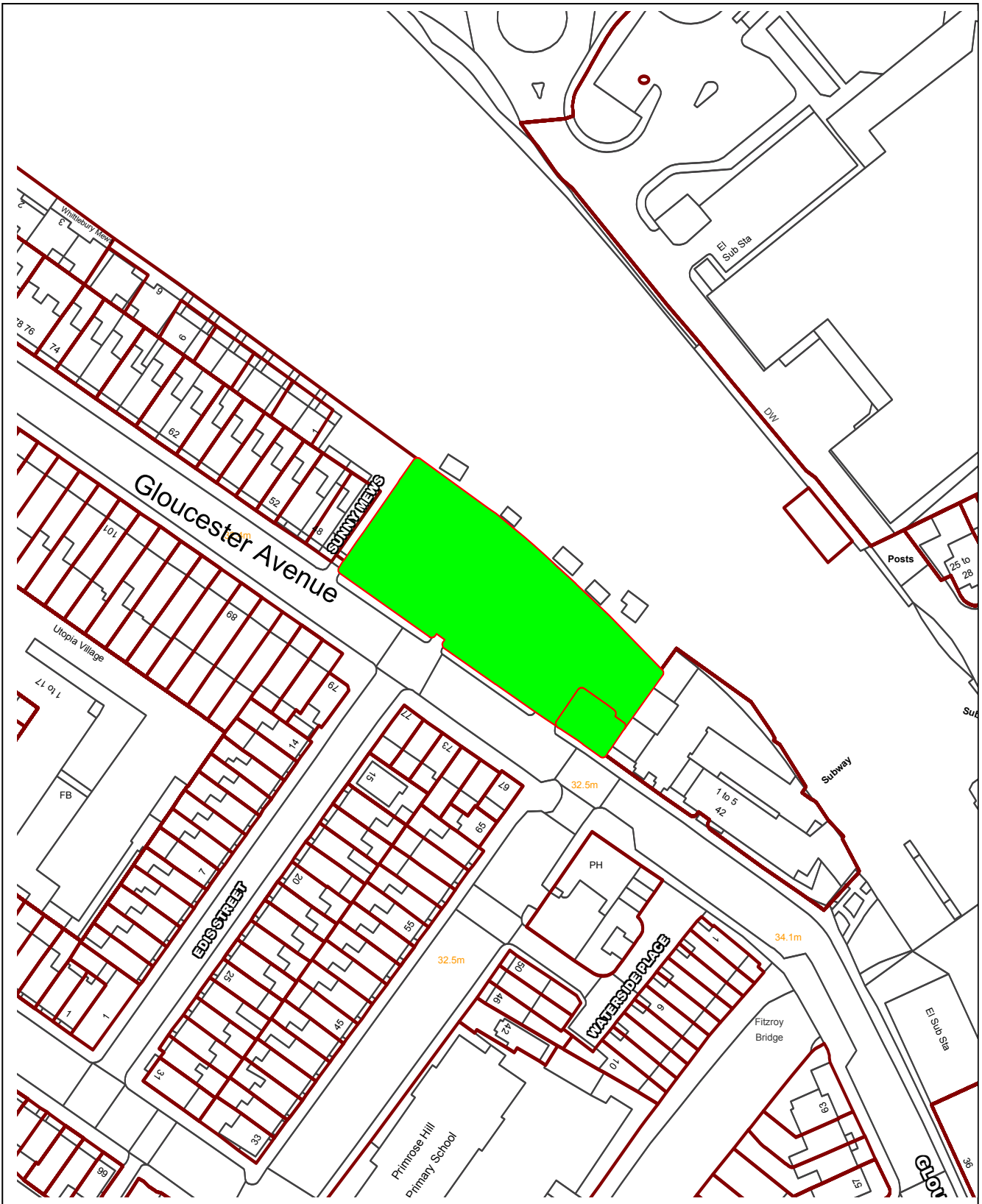
- 3.1 We note that in arriving at the current offer the applicant initially proposed units B01 and B02 as affordable which were noted to have independent access and as such would minimise issues associated with service charges and shared service cores.
- 3.2 Unit B01 had a high market value and the substitution of this unit for additional units has the effect of increasing overall unit number provision and maximising the numbers of people that can be accommodated by affordable housing in this scheme


4.0 Deferred Payment

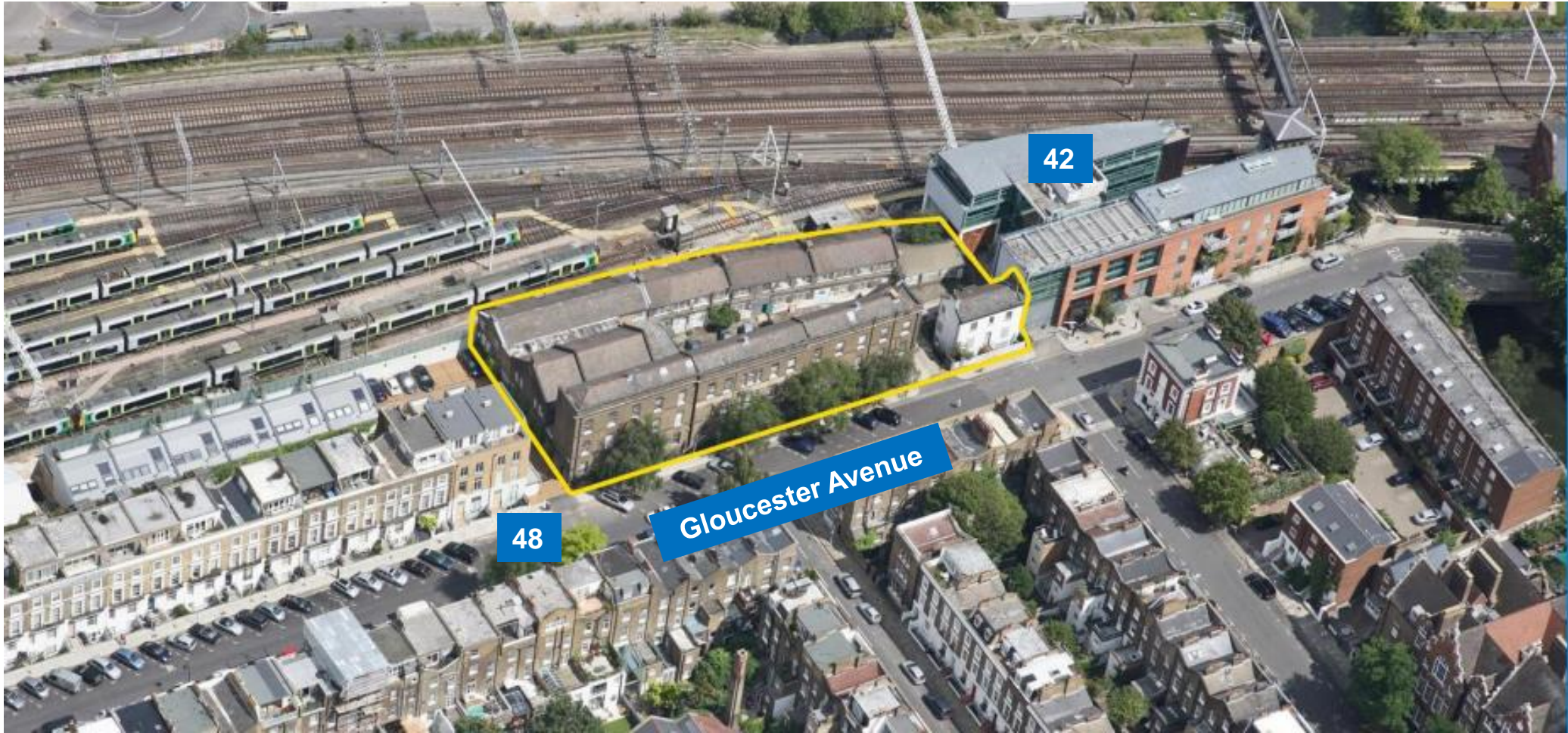
- 4.1 The four proposed affordable housing units (B02, B03, 1.10 & 1.11) have a combined floor area of 382m² (4,122 ft²) NIA. Appendix 1 sets out our calculations to determine the GEA of these from the area schedule provided by the applicants.
- 4.2 We identify a shortfall on the onsite provision (604m²) of 1,700m² against the total required for this site (2,304m²). This figure has then multiplied by the rate identified under DP 3 and CPG 8 resulting in a DAHC figure of £4,505,000.

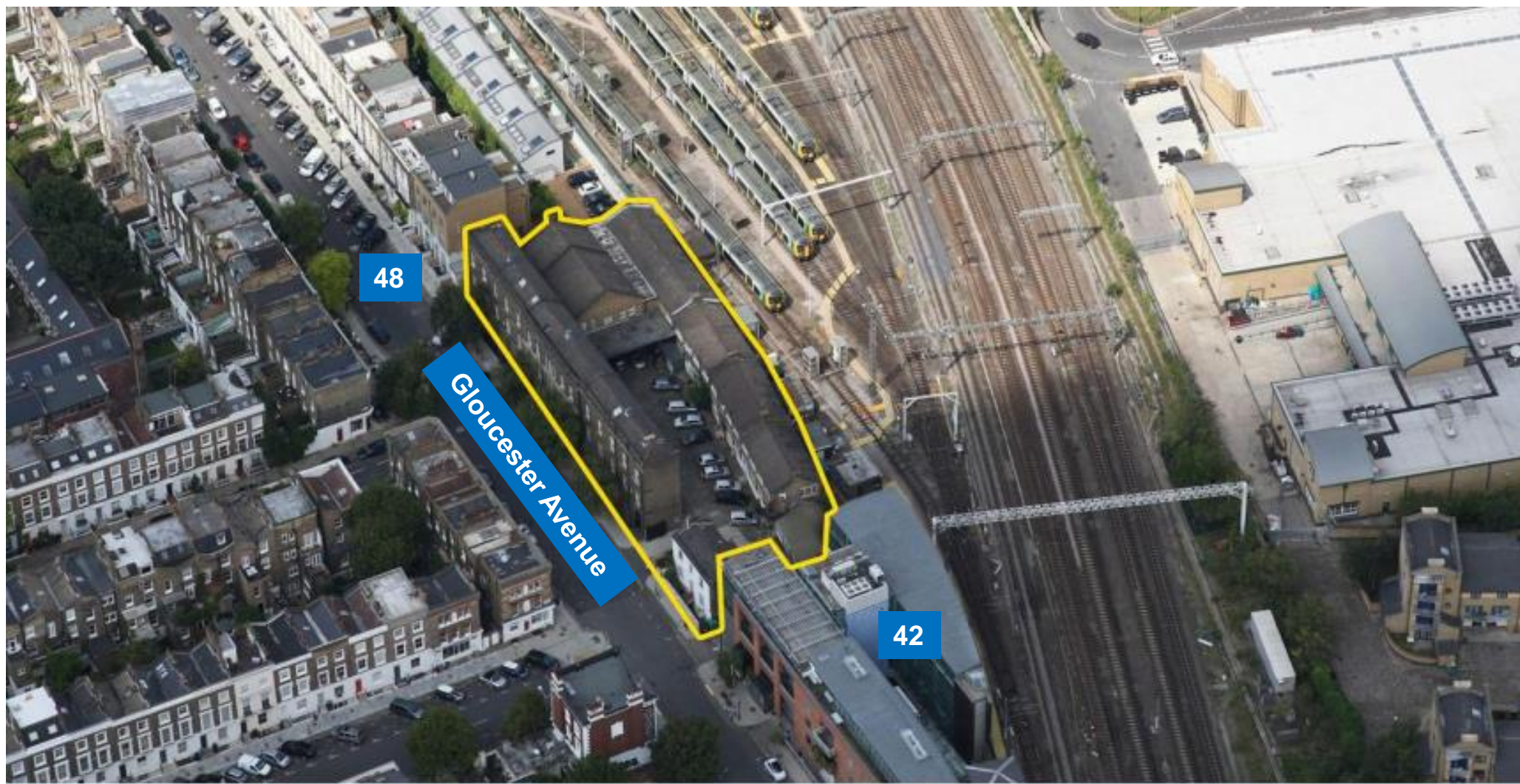
Appendix 1:

Basement Level (819m² GEA)	NIA	% of Total NIA	GEA Apportionment
B02	56m ²	14.18%	116m ²
B03	64m ²	16.20%	133m ²
Total Basement NIA = 395m²			
Ground Level (738m² GEA)	NIA	% of Total NIA	GEA Apportionment
B02	54m ²	10.11%	75m ²
B03	62m ²	11.61%	86m ²
Total Ground Level NIA = 534m²			
First Floor (1,191m² GEA)	NIA	% of Total NIA	GEA Apportionment
1.10	79m ²	8.80%	105m ²
1.11	68m ²	7.57%	90m ²
Total Frist Floor NIA = 898m²			
Total GEA of affordable units : 604m²			

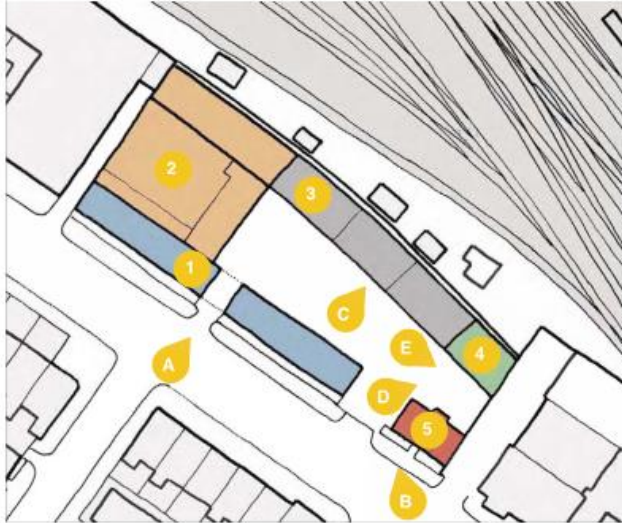


	<p>Application No: 2015/1243/P</p> <p>44 - 44a Gloucester Avenue</p> <p>London</p> <p>NW1 8JD</p>	<p>Scale: 1:1250</p> <p>Date: 5-Oct-15</p>	<p>N</p> 
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D COURTYARD FACING BUILDING. (DEMOLISHED WITHIN CONSENTED 2012 SCHEME)



E COURTYARD FACING BUILDING. (DEMOLISHED WITHIN CONSENTED 2012 SCHEME)

Building 4 – to be demolished



C INDUSTRIAL BUILDING ON THE RAILWAY TRACK BOUNDARY.

Building 3 – to be retained



A 44A GLOUCESTER ROAD (EME) **Rear Elevation**

B 44A GLOUCESTER ROAD (EME) **Side Elevation**



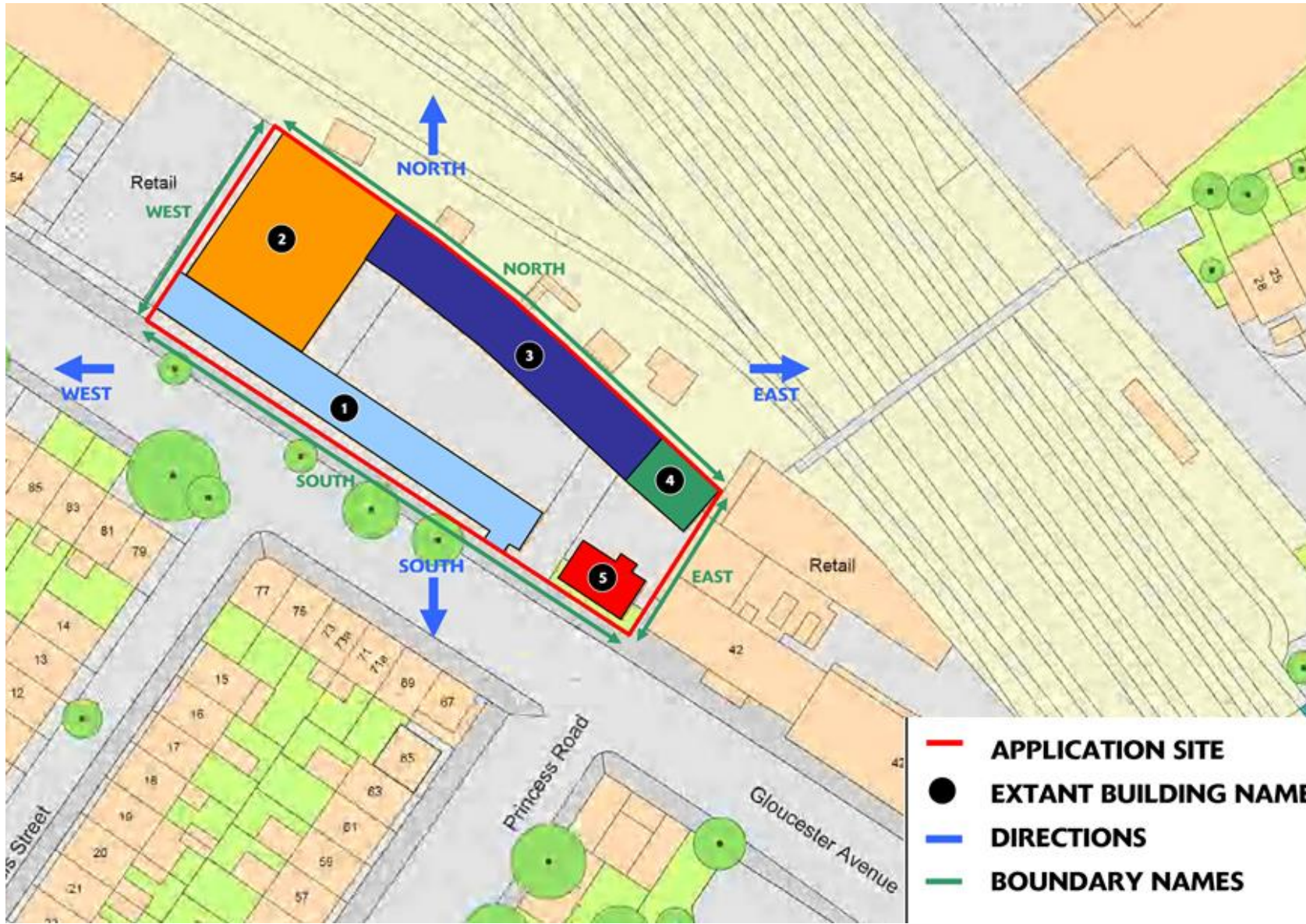
Facing Courtyard

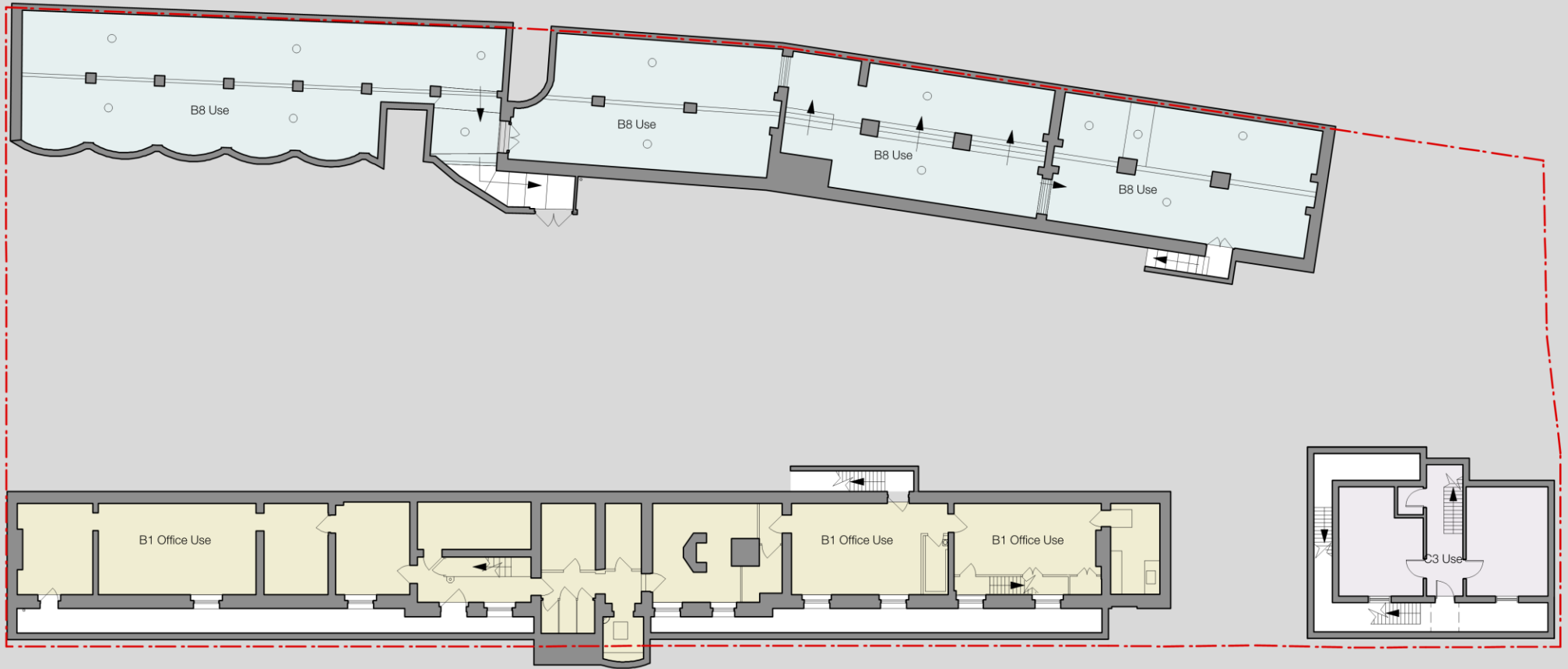
(ED 2012 SCHEME)



Facing Sunny Mews

(SCHEME)



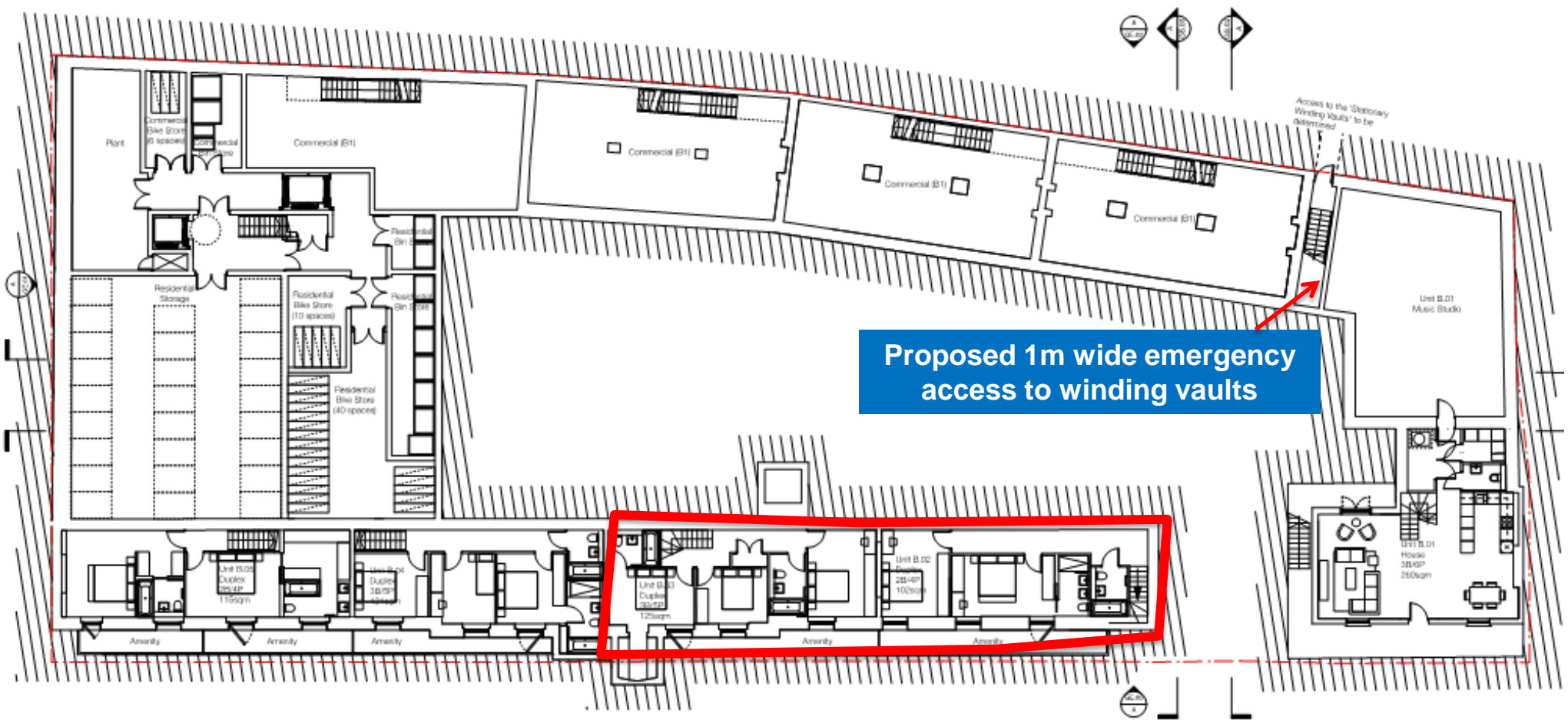


- Existing B1 Use
- Existing B8 Use
- Existing C3 Use



A Existing First Floor General Arrangement
EX.01 1:100 @A1 1:200 @A3



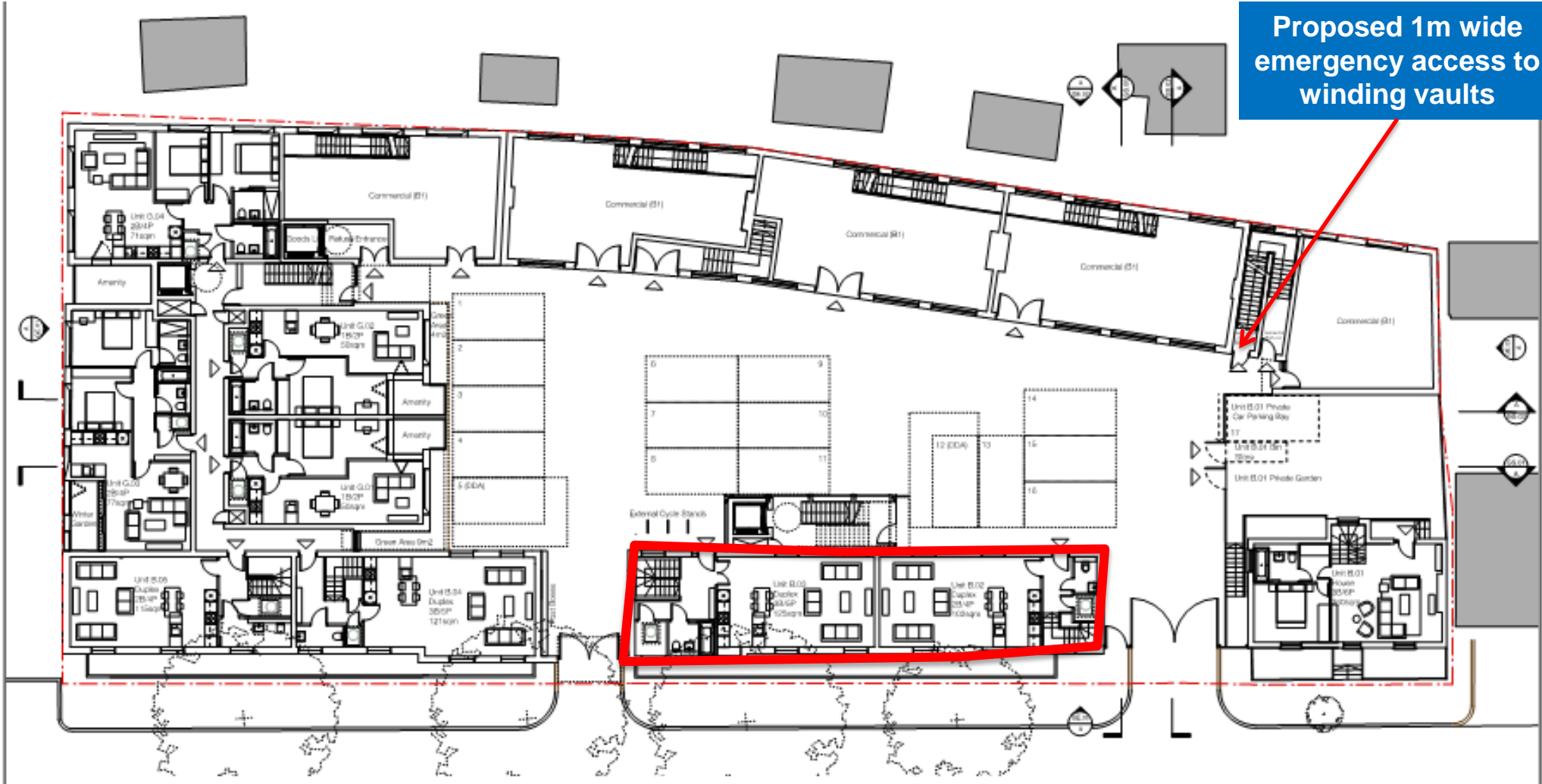


Proposed 1m wide emergency access to winding vaults



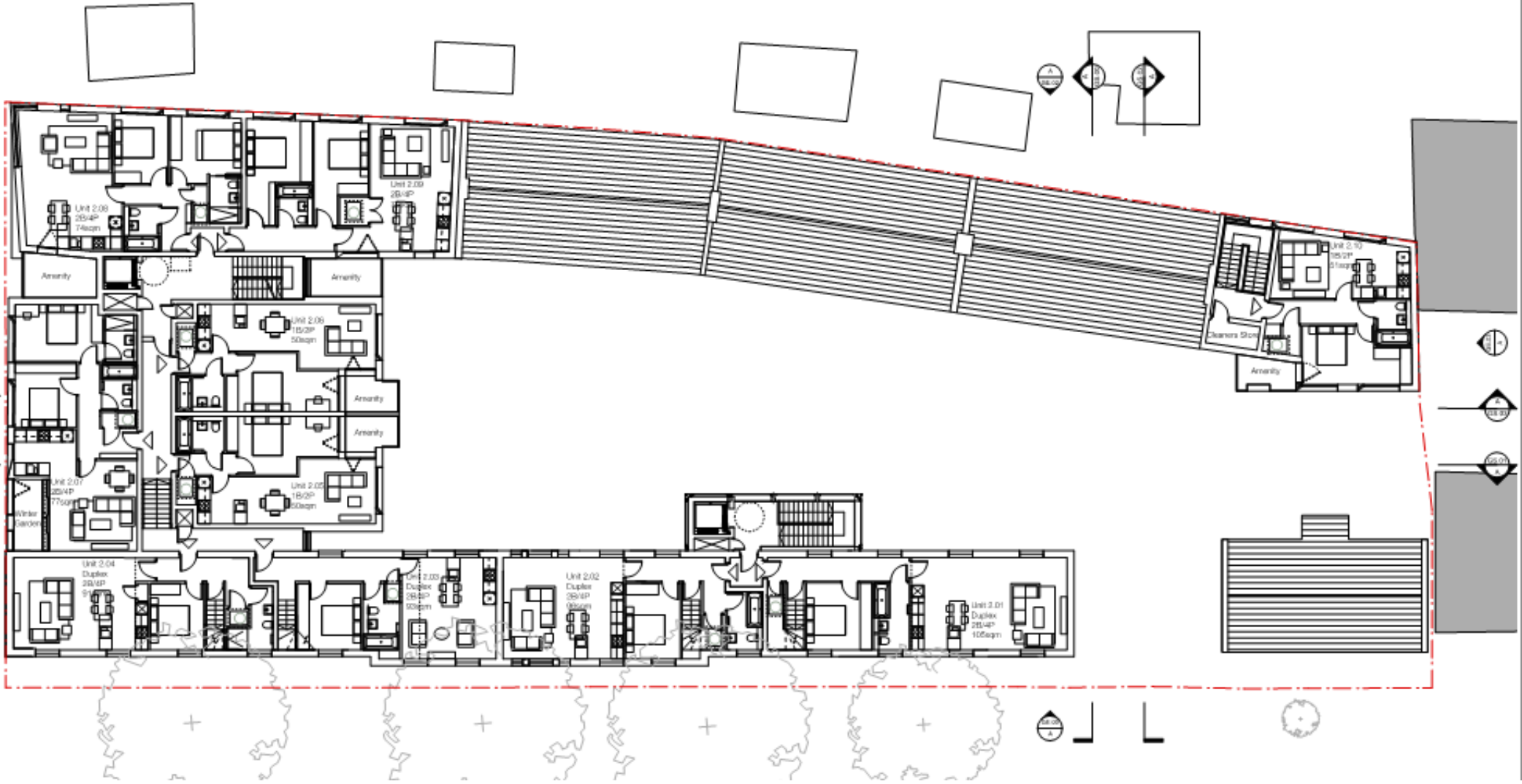
Proposed Affordable Housing Units (B02 & B03)

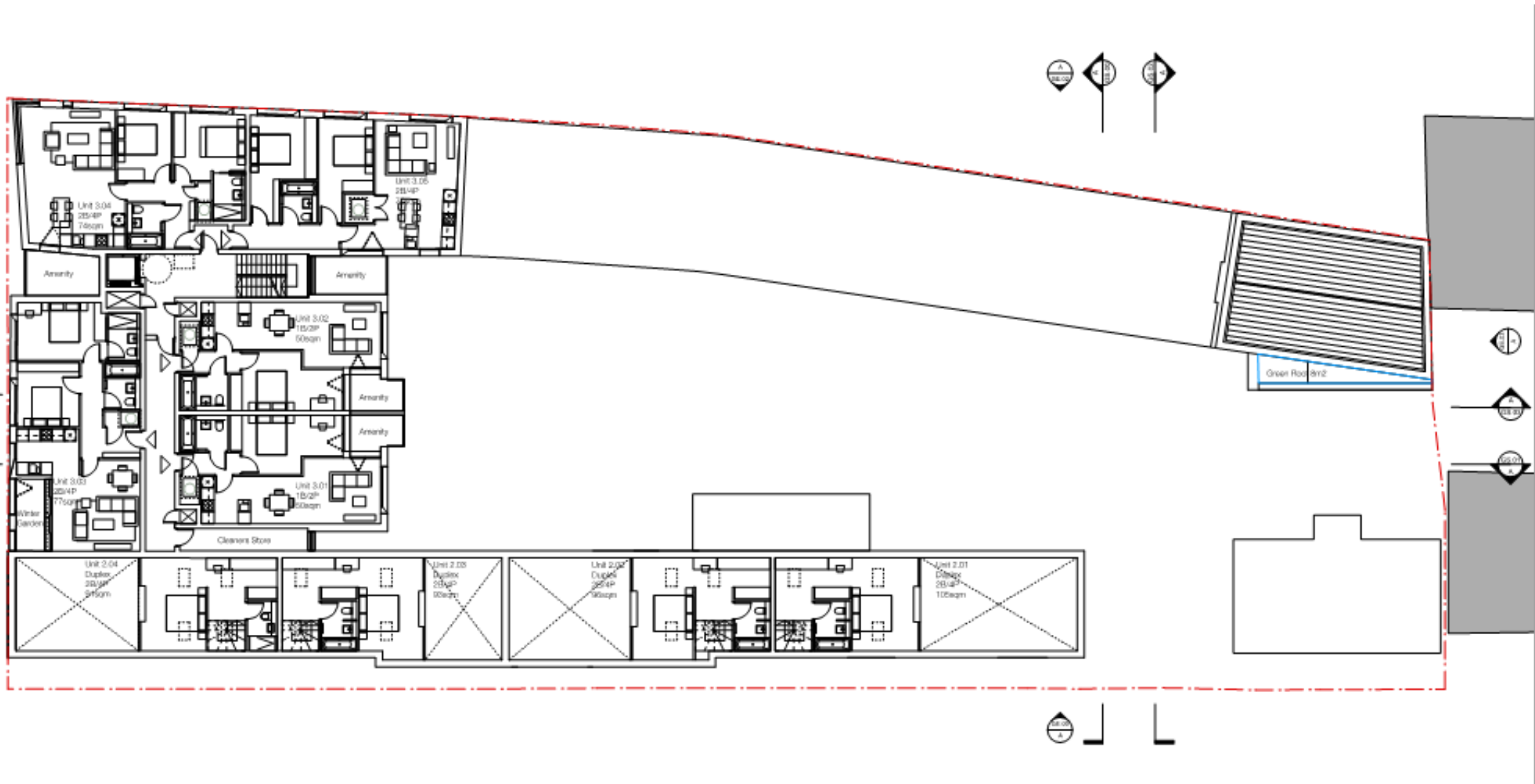
Proposed 1m wide emergency access to winding vaults

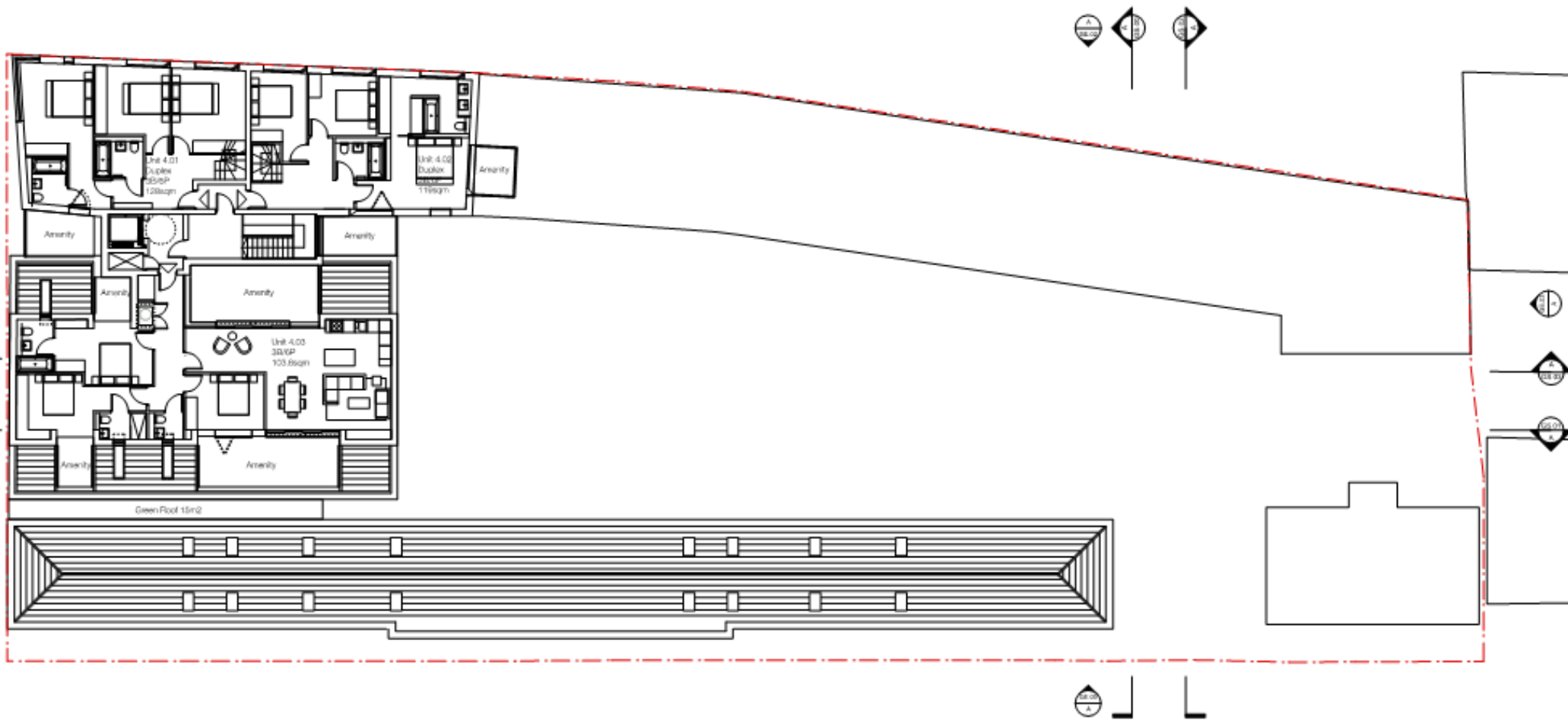


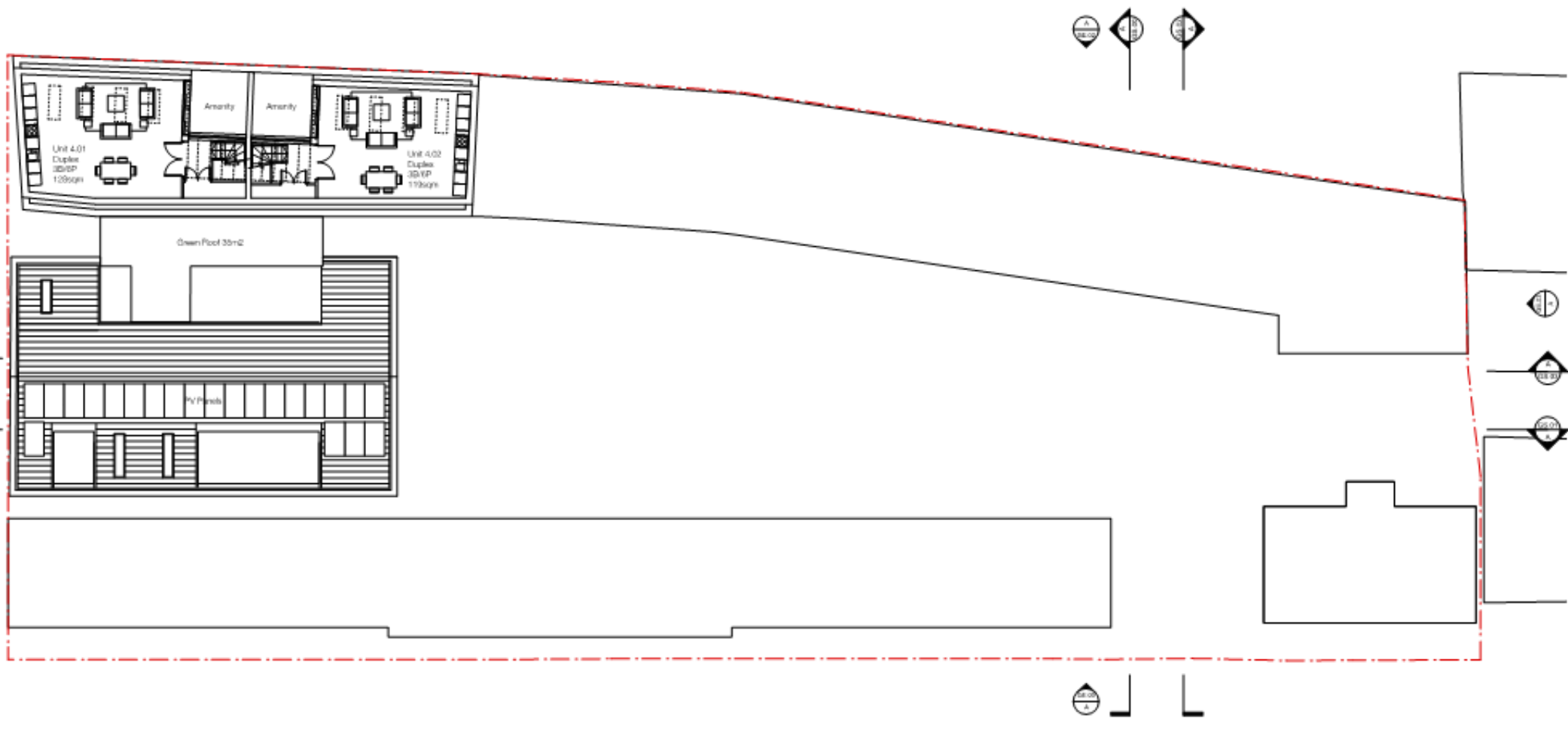
Proposed Affordable Housing Units (B02 & B03)

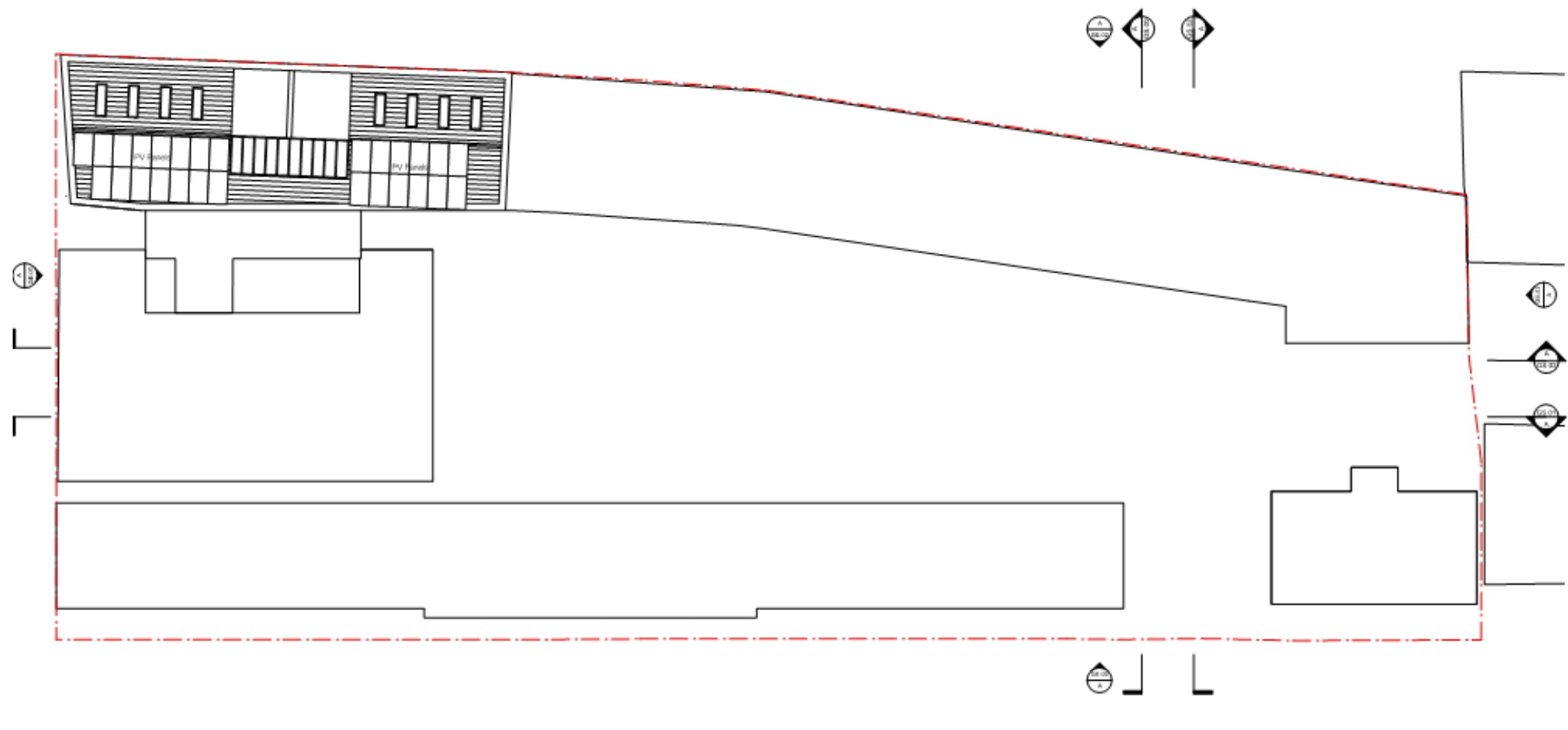












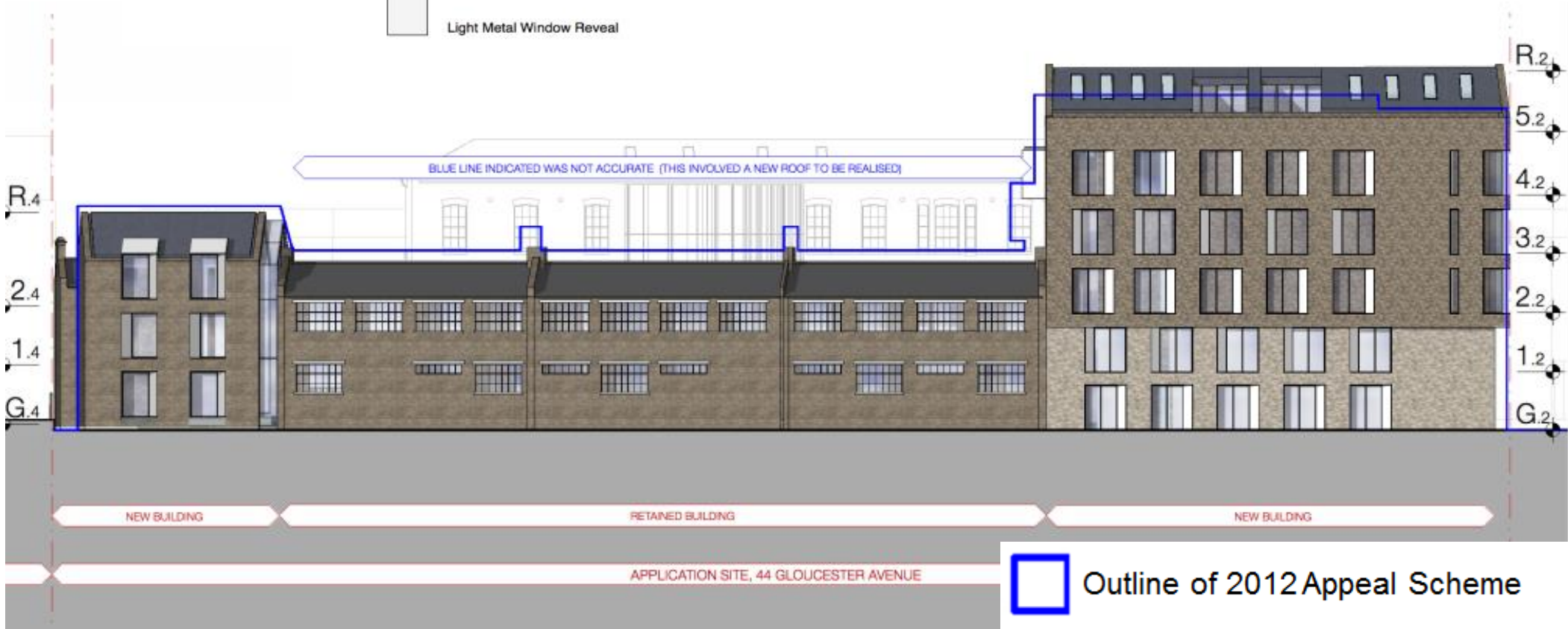


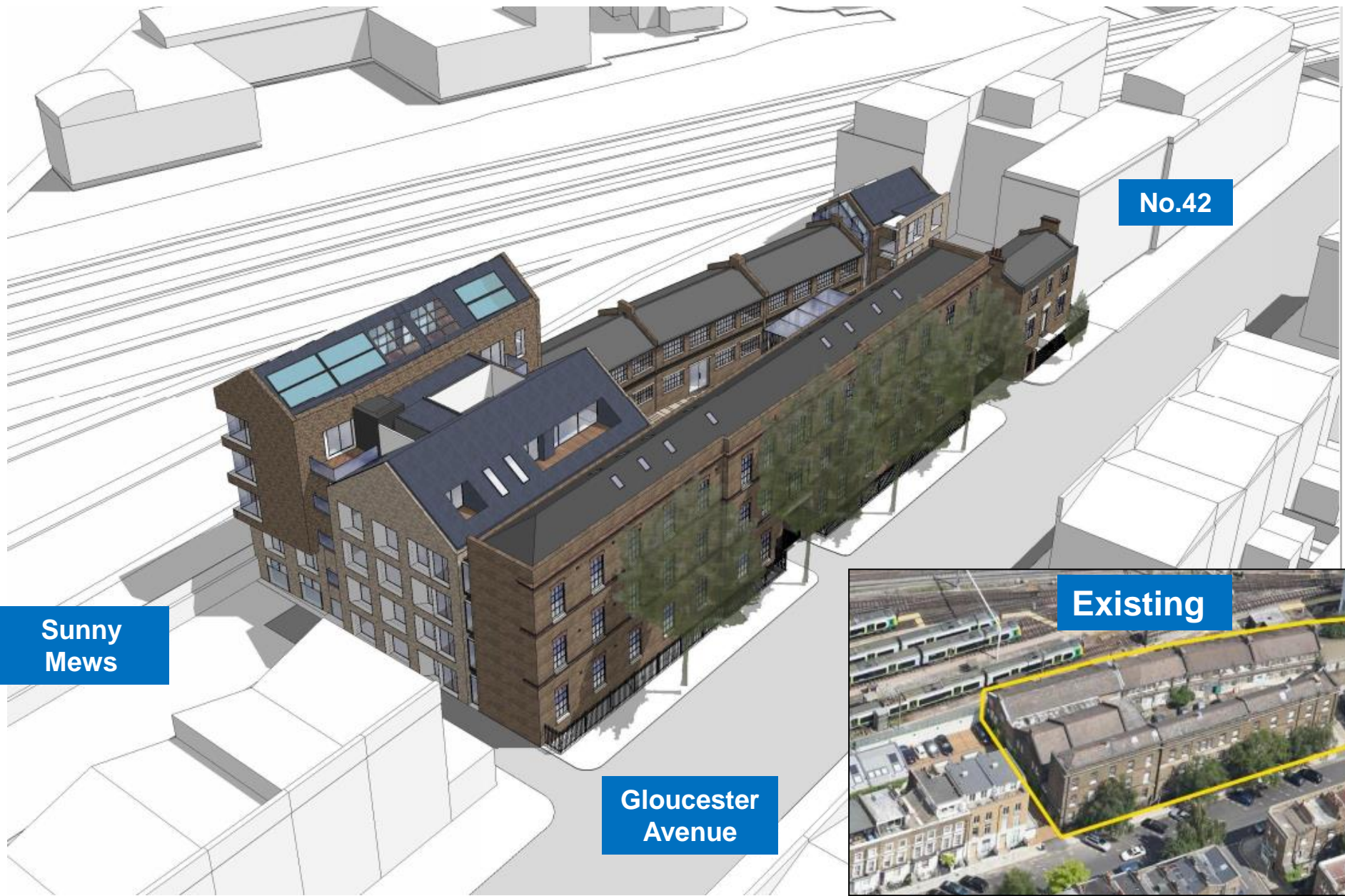
 Outline of 2012 Appeal Scheme





-  Metal Roof Cladding
-  Retained Brick
-  Dark Brick
-  Light Brick
-  Grey Metal Cladding
-  Glazing
-  Light Blue Metal Cladding
-  Dark Blue Cladding
-  Light Metal Window Reveal





Sunny
Mews

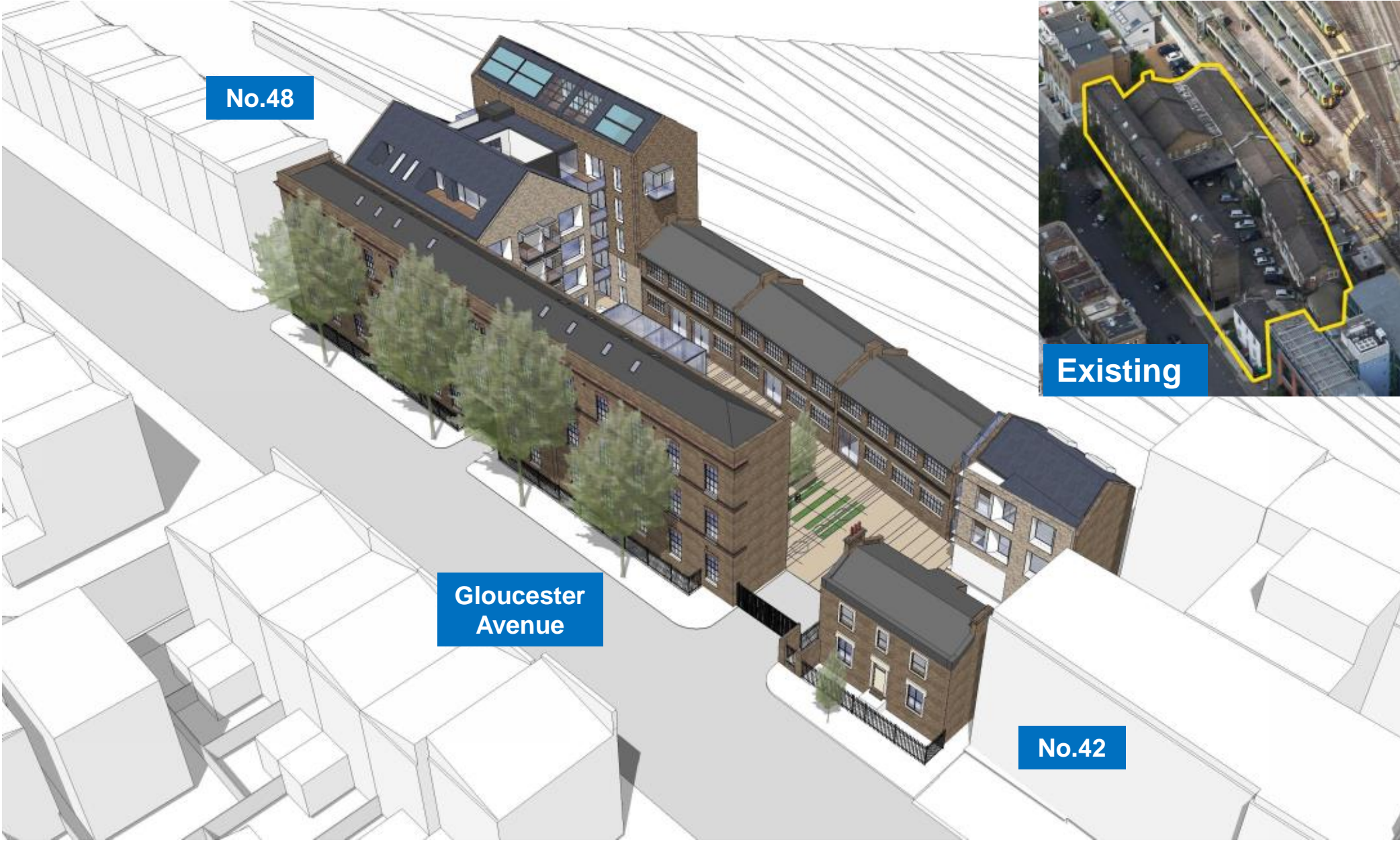
No.42

Gloucester
Avenue

Existing



Existing

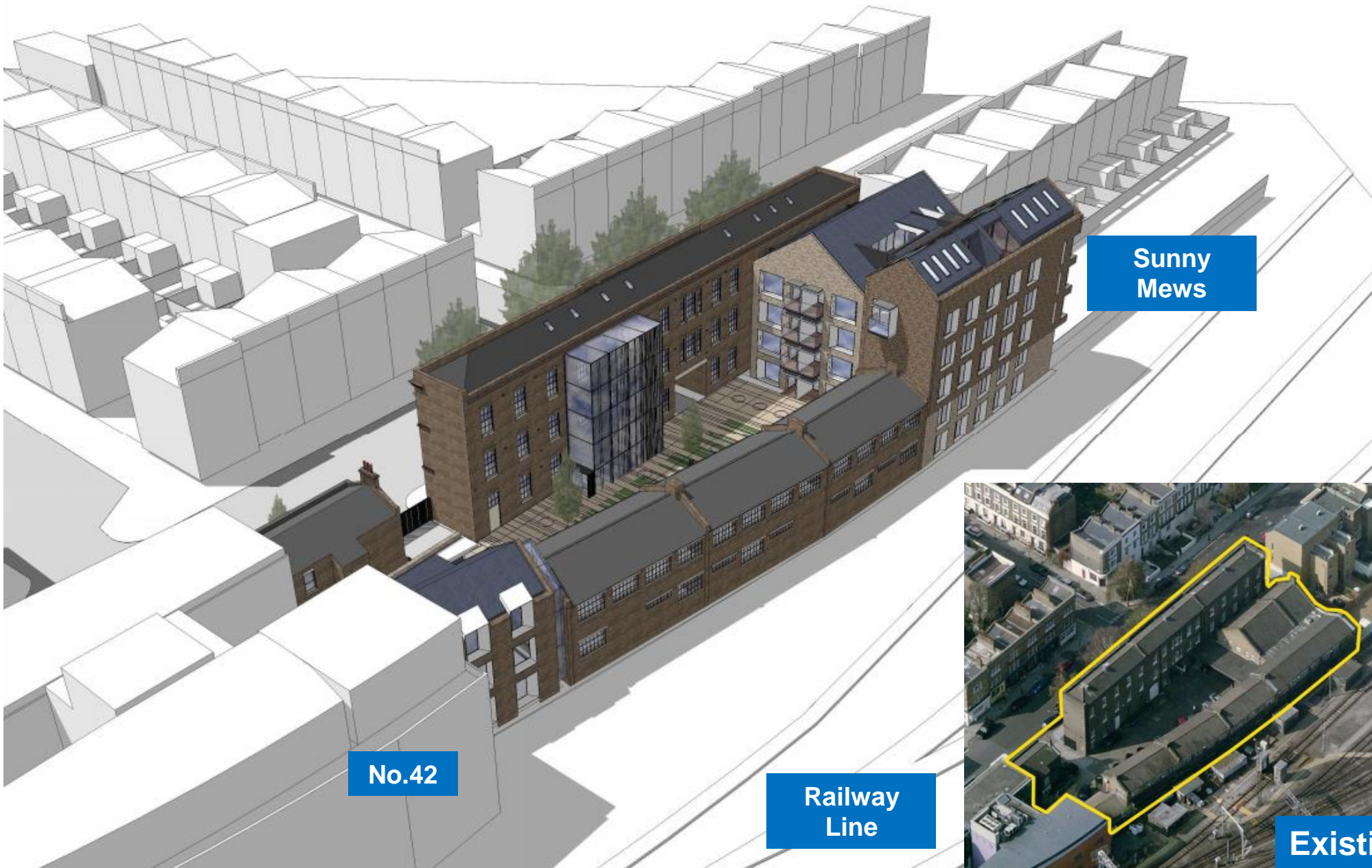


No.48

Existing

Gloucester Avenue

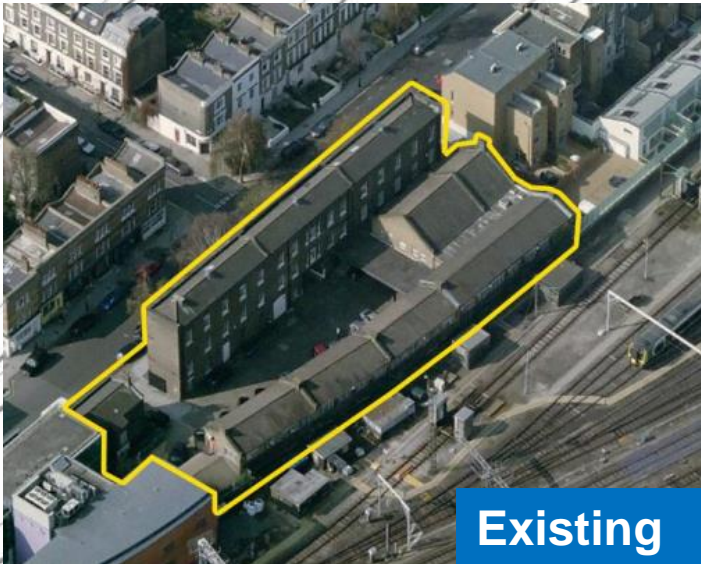
No.42



Sunny Mews

No.42

Railway Line



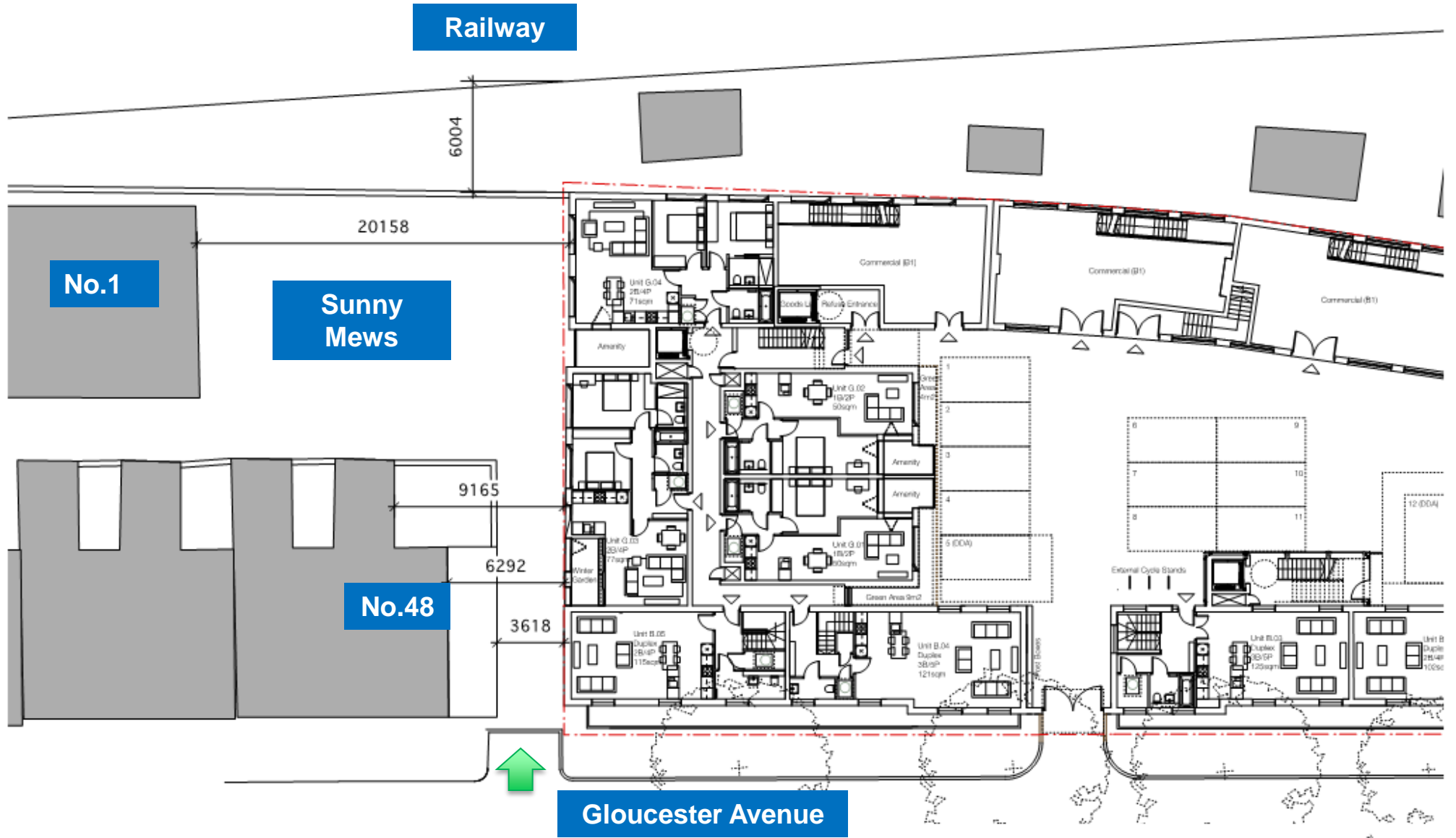
Existing

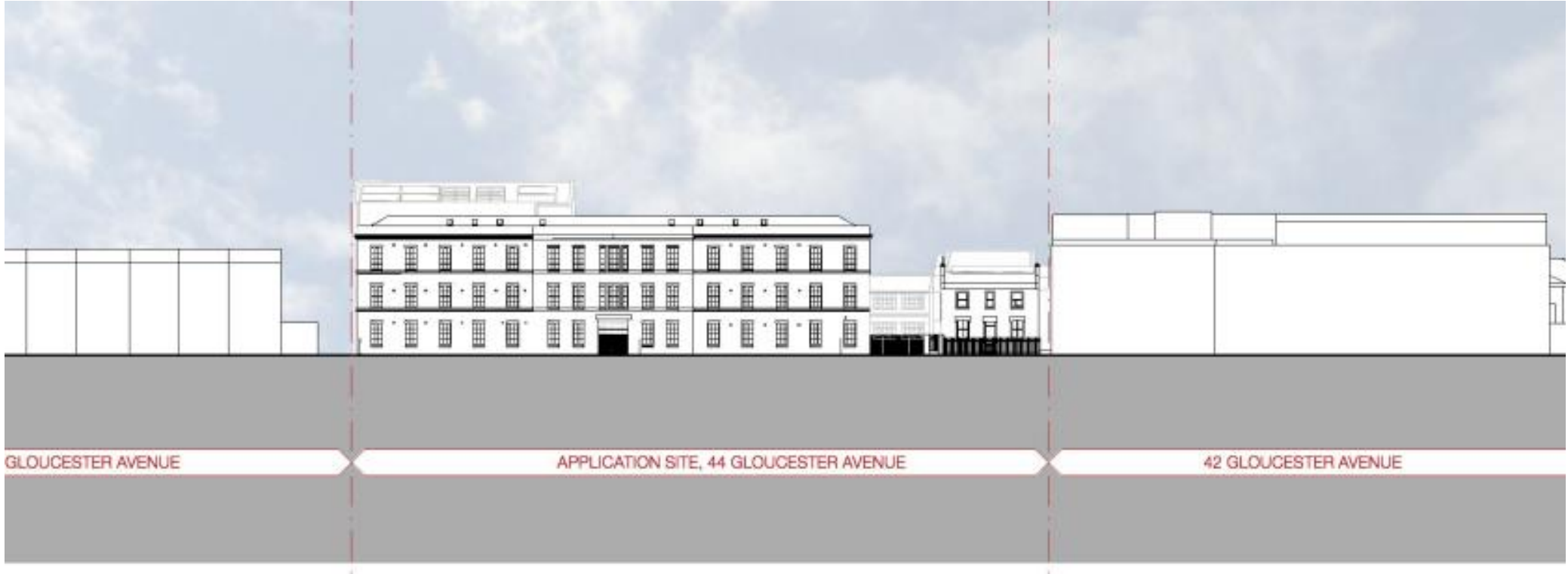


-  Metal Roof Cladding
-  Retained Brick
-  Dark Brick
-  Light Brick
-  Grey Metal Cladding
-  Glazing
-  Light Blue Metal Cladding
-  Dark Blue Cladding
-  Light Metal Window Reveal




 Outline of 2012 Appeal Scheme





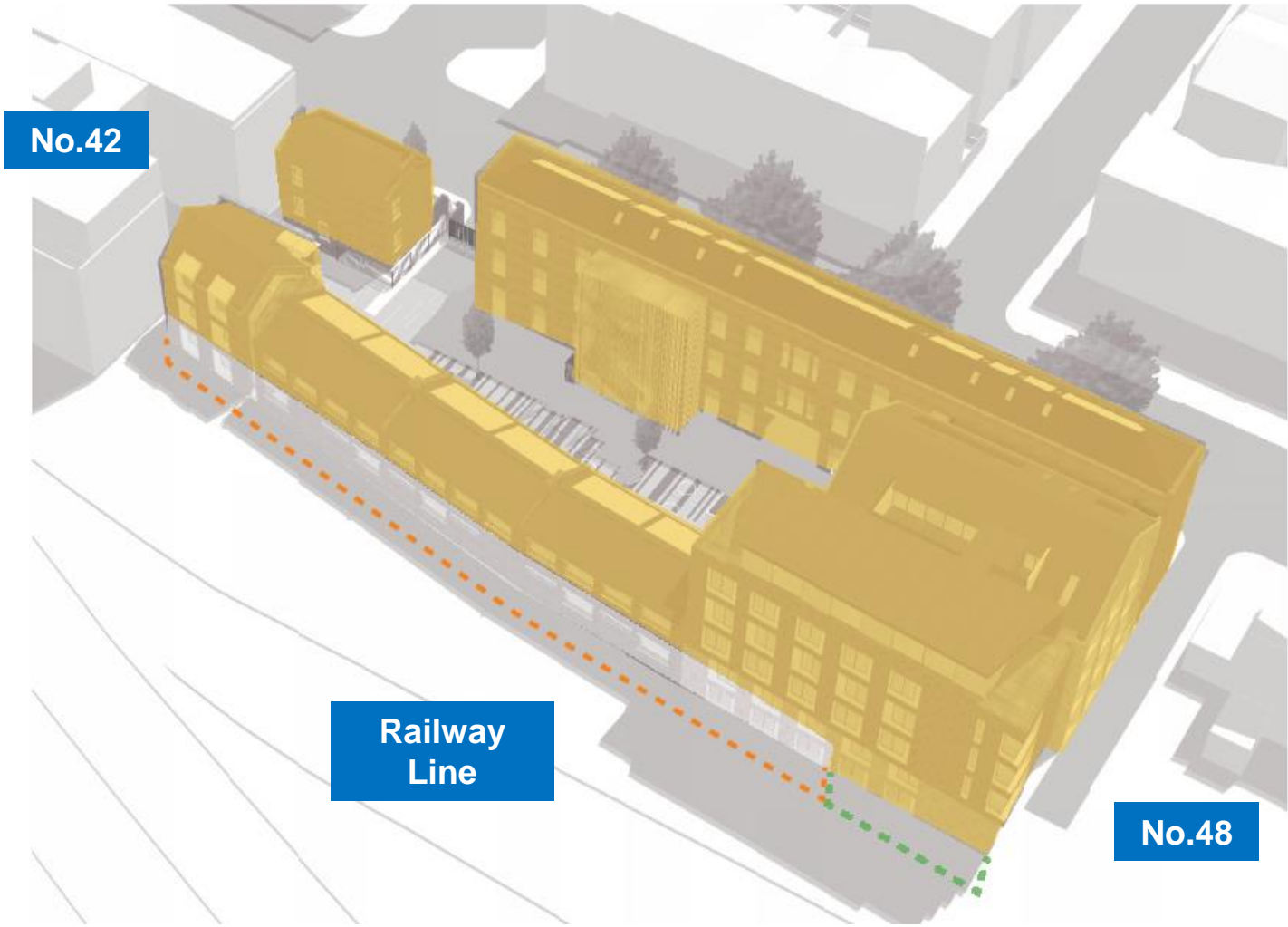
-  Metal Roof Cladding
-  Retained Brick
-  Dark Brick
-  Light Brick
-  Grey Metal Cladding
-  Glazing
-  Light Blue Metal Cladding
-  Dark Blue Cladding
-  Light Metal Window Reveal



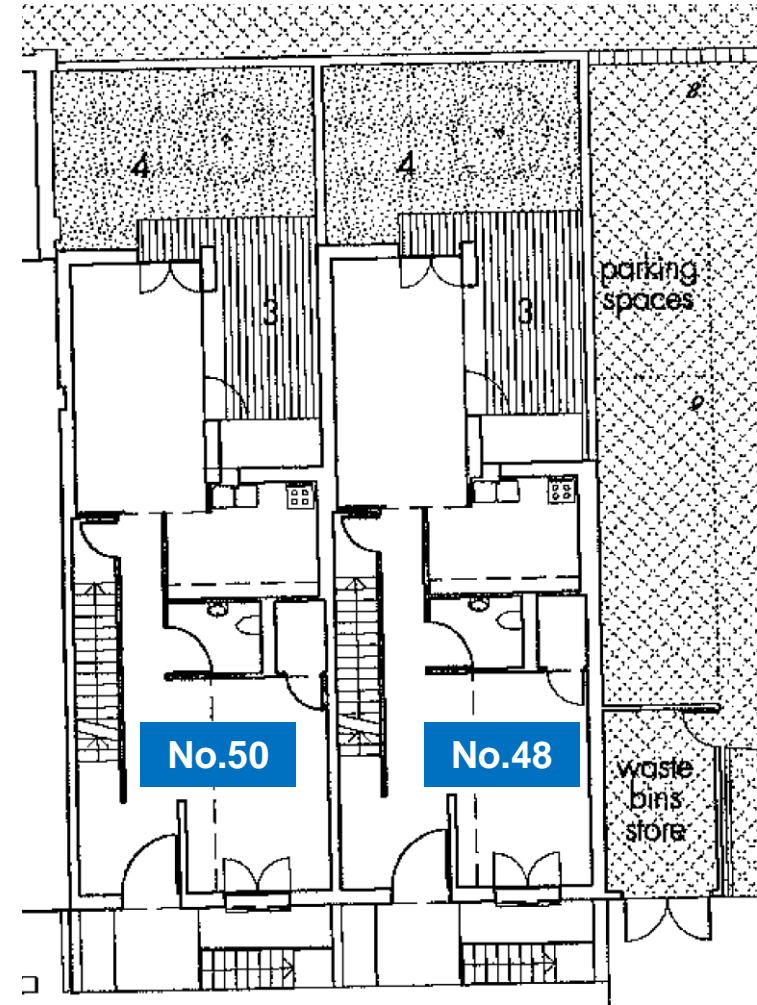
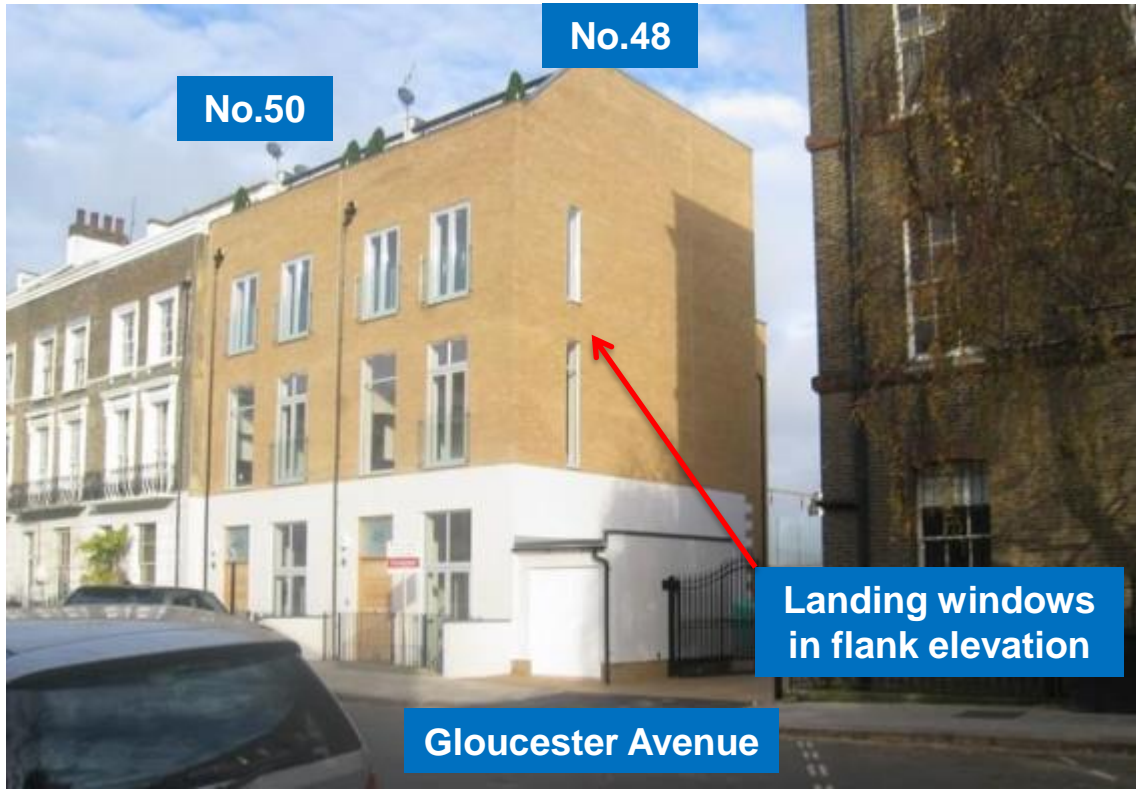
 Outline of 2012 Appeal Scheme

-  Metal Roof Cladding
-  Retained Brick
-  Dark Brick
-  Light Brick
-  Opaque Glazing
-  Grey Metal Cladding
-  Glazing
-  Light Blue Metal Cladding
-  Dark Blue Cladding
-  Light Metal Window Reveal

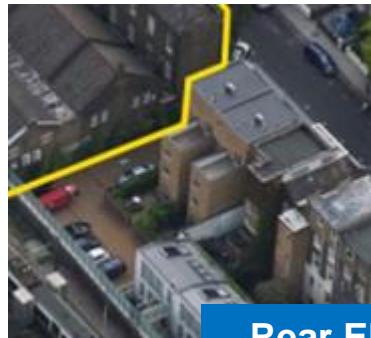




-  Residential Accommodation
40 Units
-  Commercial Accommodation
5 Units
-  Commercial Accommodation
Basement
-  Plant and Bin/Bike Store



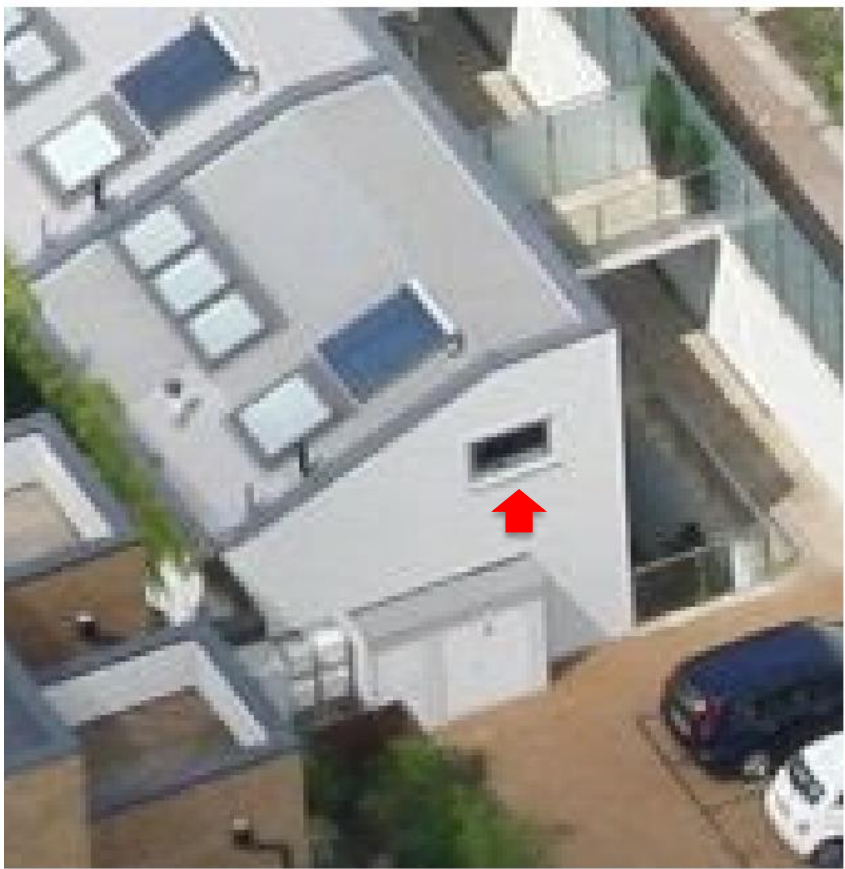
Ground Floor



Rear Elevation



20.1m away from western boundary





Courtyard



Railway Line

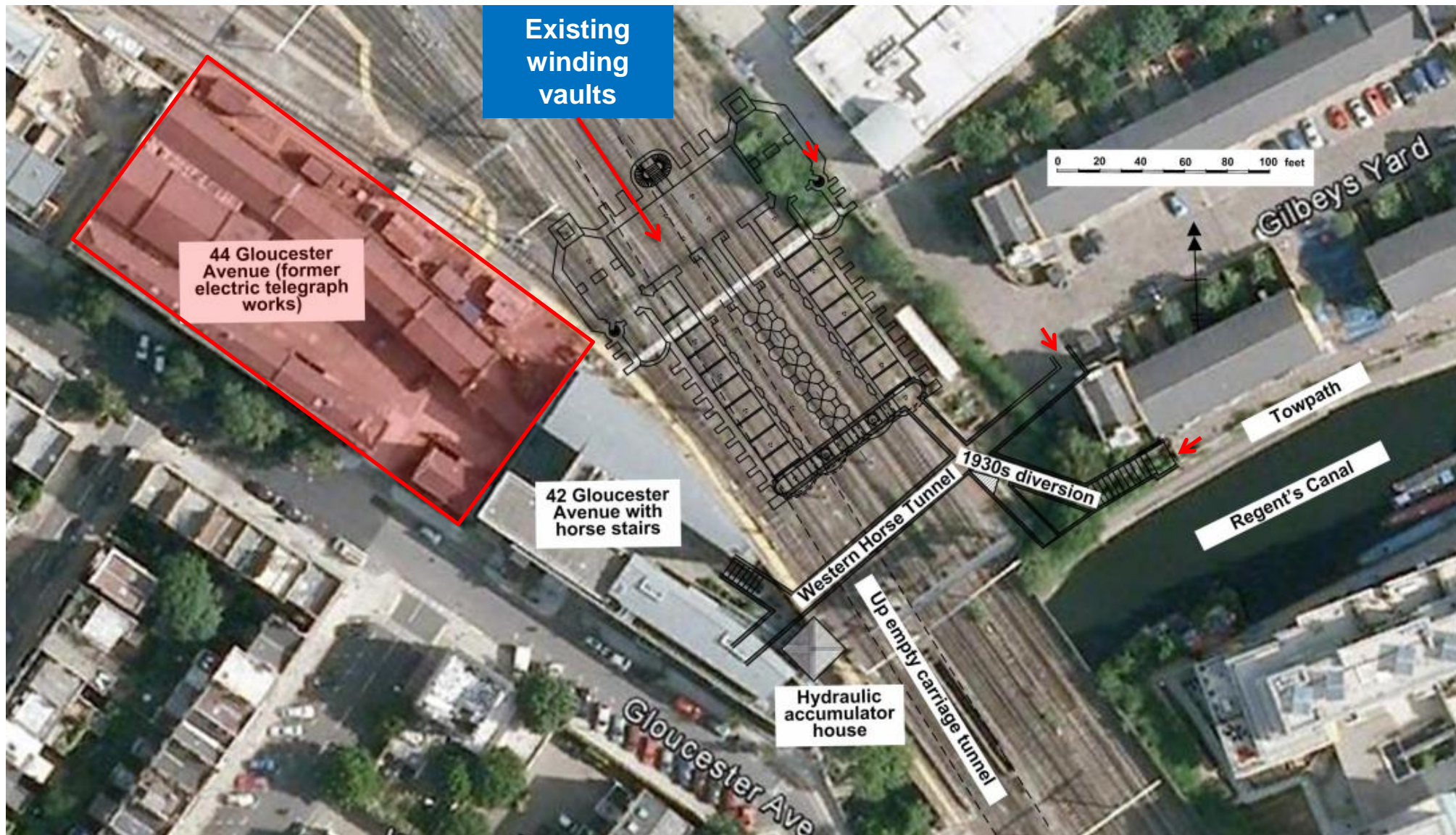


Gloucester Avenue



Sunny Mews





→ Existing Access





A 44A GLOUCESTER AVENUE.



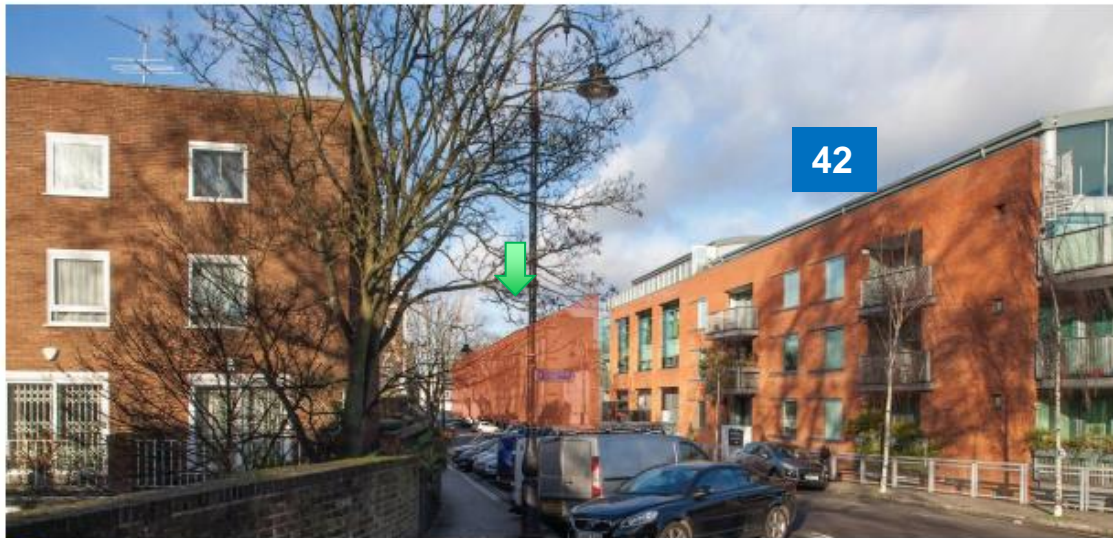
B 44A GLOUCESTER AVENUE.

Building 1



C 44A GLOUCESTER AVENUE.

Building 5



D 44A GLOUCESTER AVENUE.

Buildings 1 & 5



E 44A GLOUCESTER AVENUE.

Building 1



F 44A GLOUCESTER AVENUE.

