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| Address: | Highgate Centre and A&A Self-Storage (Former Lensham House) 19 - 37 Highgate Road and 19 Greenwood Place London NW5 | | 2 |
| Application Number: | 2016/5372/P | Officer: Jonathan McClue | |
| Ward: | Kentish Town | | |
| Date Received: | 29/09/2016 | | |
| <p>Proposal: Demolition of existing buildings (D1, B1a and B8 uses) and redevelopment of the site to provide two buildings containing a 2 storey basement (Building 1: 8 storeys and Building 2: 7 storeys) with 4,360m² of self-storage (B8); 1,798m² of office (B1a); 95m² of community cafe (A3) space (all areas GIA) and 60 self-contained residential flats (C3) including 52 market units (16x1 bed, 29x2 bed, 7x3 bed) and 8 social rented units (8x1 bed) along with the creation of a pedestrian walkway running east to west linking Highgate Road with Greenwood Place; the creation of a vehicular access from Greenwood Place and loading bay; provision of green/brown roofs and plant equipment; roof terraces and balconies and other associated works.</p> | | | |

Background Papers, Supporting Documents and Drawing Numbers:

Existing and Demolition Drawings: (JA12_Z0_)P_00_001 Rev A; E_NE_001 Rev A; E_NW_001 Rev A; E_NE_001 Rev A; E_SE_001 Rev A; E_SW_001; SS_AA_001 Rev A; SS_BB_001 Rev A; SS_CC_001 and (JC20_Z0_)E_NE_001 Rev A; E_NW_001 Rev A; E_SE_001 Rev A; E_SW_001 Rev A; P_00_001 Rev A.

Proposed Drawings: (C645_)Z0_P_00_001 Rev D; P_00_001 Rev E; P_01_001 Rev B; B0_P_02_001 Rev C; P_03_001 Rev B; P_04_001 Rev B; P_05_001 Rev B; P_06_002 Rev B; P_07_001 Rev C; P_B1_001 Rev B; P_B2_001 Rev B; P_RF_002 Rev C; B1_E_NE_001 Rev C; B1_E_NW_001 Rev E; B1_E_SE_001 Rev D; B1_E_SW_001 Rev E; B2_E_NE_001 Rev F; B2_E_NW_001 Rev C; B2_E_SE_001 Rev F; B2_E_SW_001 Rev C; Z0_NE_002 Rev G; Z1_E_01_001 Rev B; Z1_E_02_001 Rev B; Z1_E_03_001 Rev C; Z1_E_04_001 Rev B; Z1_E_05_001; Z1_E_06_001; Z1_E_07_001 Rev A; Z1_E_08_001; Z1_E_09_001 Rev A; Z2_D_001-004; Z2_E_01_001 Rev B; Z2_E_02_001 Rev C; Z2_E_03_001; Z2_E_04_001 Rev A; S_AA_001 Rev C; S_BB_001 Rev C; S_CC_001 Rev C; S_DD_001 Rev C; Z0_SS_AA_001 Rev C; Z0_SS_BB_001 Rev C; Z0_SS_CC_001 Rev C; Z0_P_00_002 Rev A; Z0_E_NE_001 Rev G; Z1_D_001-006 and (D811_P_)00_001 Rev A; 00_002 Rev A; 01_001 Rev A; 01_002 Rev A; 00_003-006 Rev B; D_01_001.

Supporting Documents: Affordable Housing and Economic Viability Assessment dated 26/09/2016; Construction Management Plan pro forma v2.1; Daylight and Sunlight (ref: 7554) dated 23/09/2016; Design and Access Statement dated September 2016; Ecology Appraisal (ref: 20186/S/ECO01/04) Rev 04 dated 23/09/2016; Energy Strategy (ref: 17411/S/ES01/03) Rev 03 dated 26/09/2016; Flood Risk Assessment (ref: 20186/S/FRA01/03) Rev 03 dated 27/09/2016; Heritage Statement dated September 2016; Historic Environment Assessment dated May 2016; Planning Statement dated September 2016; Residential Travel Plan; Statement of Community Involvement dated September 2016; Sustainability Statement (ref: 17411/S/RT01/03) Rev 03 dated 26/09/2016; Transport Assessment; Workplace Travel Plan; Acoustics Planning Report (ref: 20186/A/AC01/03) Rev 03 dated 26/09/2016; Air Quality Assessment (ref: 20186/S/AQA03/03) Rev 03 dated 12/05/2016; BREEAM 2014 Pre-assessments Greenwood Place/Highgate Road (ref: 20186/S/BRE01/01) Rev 01 dated 26/09/2016; Preliminary Phase II Contamination Assessment (ref: 20186/S/RT02/01) Rev 01 dated 27/09/2016; Civil & Structural Concept Report Issue P2 dated 22/09/2016; Tree Report (ref: PRI20128tr) dated 10/09/2019; Health Impact Assessment dated October 2016; Basement Impact Assessment (ref: CG/18500) Rev 2 dated May 2016; Below Ground Drainage Strategy Issue P1 07/03/2016; Residential Overheating Risk (ref: 17411/S/TC01/00) Rev 00 dated 20/12/2016; HM Responses to comments received from Camden Council; CGL Response to comments (ref: CG/18500) dated 28/02/2016; Ground Investigation Report; Daylight and Sunlight (ref: 7554) dated 13/01/2017.

RECOMMENDATION SUMMARY: Grant Conditional Planning Permission Subject to a Section 106 Legal Agreement

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|-------------------|---------------|
| Applicant: | Agent: |
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|---------------------------------------|---|
| Fortnum Developments Ltd c/o agent | Jon Dingle Ltd 29 The Green Winchmore Hill London N21 1HS |
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ANALYSIS INFORMATION

| Land Use Details: | | | |
|-------------------|-----------|--|---------------------------|
| | Use Class | Use Description | Floorspace (GIA) |
| Existing | | <i>B8 - Storage or Distribution</i> | <i>2,100m²</i> |
| | | <i>B1a Business – Office</i> | <i>748m²</i> |
| | | <i>D1 – Non-residential Institutions</i> | <i>795m²</i> |
| Proposed | | <i>C3 - Dwelling House</i> | <i>7,031m²</i> |
| | | <i>B8 - Storage or Distribution</i> | <i>4,360m²</i> |
| | | <i>B1a - Office</i> | <i>1,798m²</i> |
| | | <i>A3 - Restaurants and Cafes</i> | <i>95m²</i> |
| | | <i>D1 – Non-residential Institutions</i> | <i>0m²</i> |

| Residential Use Details: | | | | | | | | | | |
|--------------------------|------------------------|--------------------------|-----------|----------|----------|----------|----------|----------|----------|----------|
| | Residential Type | No. of Bedrooms per Unit | | | | | | | | |
| | | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9+ |
| Existing | <i>Flat/Maisonette</i> | | | | | | | | | |
| Proposed | <i>Flat/Maisonette</i> | <i>24</i> | <i>29</i> | <i>7</i> | <i>0</i> | <i>0</i> | <i>0</i> | <i>0</i> | <i>0</i> | <i>0</i> |

| Parking Details: | |
|------------------|--------------------------|
| | Parking Spaces (General) |
| Existing | <i>20</i> |
| Proposed | <i>10</i> |

OFFICERS' REPORT

Reason for Referral to Committee: This application is reported to the Planning Committee because it is a major development involving the construction of more than 10 new dwellings and more than 1000m² of non-residential floorspace (part 3(i)).

1. SITE

- 1.1 This application includes two properties located on the western side of Highgate Road in the northern area of Kentish Town, which are the Highgate Centre at 19-37 Highgate Road and the A&A Self-Storage building (formerly Lensham House) at 19 Greenwood Place. Highgate Road fronts the site to the northeast with Greenwood Place wrapping around the north facing (side) and rear elevations. The Christ Apostolic Church (23 Highgate Road) lies adjacent to the south and is a grade II listed building.
- 1.2 The Highgate Centre is a Council-owned site with a D1 (community/healthcare) use. The centre provides a group work psychotherapy-orientated Pathways Service providing practical and emotional support and is part of the Camden and Islington NHS Foundation Trust. It includes a two storey brick structure of 795m² (GIA) which fronts onto the eastern side of Highgate Road with its own car park providing 10 spaces and a loading bay (both accessed off of Greenwood Place). The building contains a pitched roof, and was purpose built in 1970 with red brick walls and exposed horizontal concrete slabs. It sits just outside the Kentish Town Industrial Area.
- 1.3 The A&A Self-Storage property includes a warehouse structure that was built in the 1970s. It is three storeys high with a pitched roof set behind white painted brick walls. There are two storeys of storage (B8) with an office (B1a) on the upper floor. The building is occupied by a self-storage company providing secure storage for domestic and business purposes. It is located behind the Highgate Centre and contains a parking area accessed from Greenwood Place. The property is located within the Kentish Town Industrial Area.
- 1.4 The Greenwood Centre (25-27 Greenwood Place) lies to the rear (west) of the site and does not form part of this application. The centre was previously run by the Council and has been vacated to commence development under 2013/5947/P to provide a new Centre for Independent Living (CIL). The development will comprise of three main floors of accommodation (3,228m² (GIA)) plus a small area of basement. The CIL will provide a combination of dedicated, shared and ancillary spaces including for mental health, profound and multiple learning disabilities, autistic spectrum condition (PMLD/ASC) and persons with dementia.
- 1.5 The application site is subject to a land use proposal under the Local Development Framework's Site Allocations Document (proposal Site 39) which includes both the Highgate and Greenwood day centres and the A&A Self-Storage building. The allocation suggests a mixed-use redevelopment including replacement D1 community facilities, new flexible employment floorspace and housing. The subject application only includes the Highgate Centre and A&A Self-Storage building with

the Greenwood Centre being developed separately to provide the essential D1 (community uses). A previous scheme approved under 2013/5947/P related to the Highgate and Greenwood centres only. The Highgate Centre part of the site included a 7-storey building with 42 residential units and 100m² of social enterprise space in flexible retail, restaurant/café, office or community use (Classes A1/A3/B1/D1). The A&A Self-Storage building did not form part of that approval so would be left undeveloped if that scheme were to be brought forward. The scheme has been implemented through the demolition and commencement of the construction of the Greenwood Centre element of the site. The extant permission is therefore not time sensitive and could be implemented at any stage. If the proposed application scheme were not to come forward, the residential element of the extant permission would be likely to come forward as part of the Council's Community Infrastructure Project (CIP) programme. Fundamentally, a residential scheme needs to be built to fund the construction of the Greenwood Centre. Therefore, the extant permission is a material consideration as a fallback position as it is likely that it would come forward in the event of the proposed development (the subject of this report) does not come forward.

- 1.6 Other area specific designations affecting the site are an Archaeological Priority Area; Contaminated Sites Potential; Underground Development Constraints (subterranean (groundwater flow), surface water flow and slope stability); article 4 direction (to remove permitted development rights for change of use to residential (C3) and the Strategic Viewing Corridor for the protected view from Kenwood to St Pauls Cathedral.
- 1.7 The site is not within a designated conservation area. Dartmouth Park Conservation Area is located approximately 50m to the north along Highgate Road. The adjacent Christ Apostolic Church, which sits between the Highgate Centre and Greenwood Place to the south, is grade II listed. Directly abutting Greenwood Place on its southern side is The Forum music and entertainment venue, which is also grade II listed. Linton House to the north is a locally listed building (a non-designated heritage asset).
- 1.8 The area is generally mixed in character. Large-scale office/warehouse buildings up to 6-7 storeys in height are located northwards of the site on the western side of Highgate Road. The streetscene and roads leading off Highgate Road are predominantly residential on the eastern side of Highgate Road heading north. To the west and north-west are various industrial depot facilities and commercial properties within the Kentish Town Industrial Area. These include Deane House, next to the Greenwood Centre to the north-west, and J Murphy and Sons Commercial Yard bounding the Greenwood Centre to the south-west. The four-storey Deane House is Council-owned and although predominantly commercial in use provides accommodation for the Camden Society at ground floor level. Camden Society operates an employment and training facility for people with learning disabilities.
- 1.9 Linton House (aka The Maple Building) has recently been converted on the upper floors to residential and given a two-storey roof extension. This conversion occurred on the first-fourth floors through a number of prior approvals refs: 2014/4618/P, 2014/4619/P and 2014/4620/P. Planning permission for a roof

extension and seven units on the fifth and six floors was granted under 2013/3494/P (amended by 2015/1627/P and 2015/6513/P). The development has resulted in residential units to the adjacent side (southeast facing) elevation of the application site (on the opposite side of Greenwood Place).

- 1.10 The site is in a highly accessible location with a PTAL score of 6a (excellent). A short distance to the south of the site is the designated Kentish Town Centre frontage. The Kentish Town Tube and Overground Stations provide the closest rail connections being approximately 300m away. The site is well served by a bus stop on Highgate Road immediately in front of the Highgate Centre.



Figure 1 (above): The application site (outlined in red) including the A&A Self-Storage and Highgate Centre buildings with the Greenwood Centre to the rear, Apostolic Church to the south and Linton House to the north.

2. THE PROPOSAL

Background

- 2.1 The Council has a programme to rationalise and enhance the adult social care services it provides to its residents with an element being the consideration of how the Council's properties can be reworked to ensure it is making the very best use of assets. As part of the programme, the Council has been looking at how it provides services for people with learning difficulties, disabilities and mental health problems. A series of consultation events held in 2011 focused upon an initiative to bring together the services currently being run from various Council facilities including Raglan House in Kentish Town (dementia), New Shoots on Shoot Up Hill (learning disabilities) and the Highgate Day Centre (mental health conditions).
- 2.2 Following consultation a range of options were put forward to the Council Cabinet meeting in April 2012 with a recommendation to agree the comprehensive development of Greenwood Place. The proposals to redevelop Greenwood Place

and Highgate Centre to provide new and purpose built facilities were adopted at the Cabinet meeting on 18th April 2012. The proposed facilities included the following:

- people with dementia using the Raglan Centre;
- people with mental health problems using the Highgate Centre;
- younger people with profound and multiple learning disabilities and autism;
- people with learning disabilities using the New Shoots service at Shoot Up Hill who want to continue to use a building based service;
- a new Centre for Independent Living (CIL) accessible for all Camden disabled people including people with low and moderate needs; and
- eight affordable rental housing units for people with social care needs within the residential element of the scheme

- 2.3 The proposals formed part of the development approved under 2013/5947/P to comprise Camden's first CIL – Centre for Independent Living, which would give people with disabilities a centre for advice, guidance and support, with the latest equipment and technology to help people live more independently. The development of the Greenwood CIL has commenced and it is expected to be completed by 2018. As stated in paragraph 1.5 (above) the permission under 2013/5947/P included the creation of the CIL at Greenwood Place along with a new 7 storey building to replace the Highgate Centre with 42 residential units and 100m² of social enterprise in flexible retail, restaurant/café, office or community use (Classes A1/A3/B1/D1). This scheme was led by the Council's Property Services working in close collaboration with Adult Social Care service commissioners and Housing to form part of the Council's Community Investment Programme (CIP). The A&A Self-Storage site did not form part of the development.
- 2.4 The Council's Adult Social Care service has determined that the inclusion of the A&A Self-Storage site as part of the redevelopment for the Greenwood CIL is desirable as it would create a more comprehensive scheme with additional benefits (as envisioned by the Site Allocations Document). The inclusion of the A&A Self-Storage site would allow the creation of a direct pedestrian access from Highgate Road to the new Greenwood CIL. It would also allow the Greenwood CIL to be visible from Highgate Road.
- 2.5 The extant approval under 2013/5947/P is a material consideration as the Highgate Centre's development has been agreed in principle and could be implemented. There is a reasonable prospect of it being built out in the event that the application proposal is unsuccessful or the scheme fails to come forward. This scheme allowed the loss of the Highgate Centre and the introduction of 42 residential units (including 8 x 1 bed assisted living units) along with a 100m² 'community' café. In summary the current proposal would bring forward the same quantum of affordable housing and the 'community' café as per the approved scheme and allow a more comprehensive development of the wider site to provide a pedestrian route through along with other public benefits. It would also enable the development of the Greenwood CIL by the funds secured through the development of the Highgate Centre for housing.

Proposals summary

2.6 Planning permission is sought for:

- The demolition of the Highgate Centre (D1) and the A&A Self-Storage (B1a and B8) buildings (description of buildings paras 1.2-3)
- Construction of two new buildings (Building 1: 8 storeys and Building 2: 6 storeys) with a 2 storey basement
- 4,360m² (GIA) of self-storage (B8) space
- 1,798m² (GIA) of office (B1a) space
- A 95m² (GIA) 'community' café (A3)
- 60 self-contained residential flats (C3) including 52 market units (16x1 bed, 29x2 bed, 7x3 bed) and 8 social rented units (8x1 bed)
- creation of a pedestrian walkway through the site running east to west linking Highgate Road with Greenwood Place
- creation of a vehicular access from Greenwood Place and loading bay
- associated alterations including the provision of 10 parking spaces, green/brown roofs, plant equipment, roof terraces and balconies, cycle parking, refuse

2.7 The proposed development includes two detached buildings (with maximum heights of 8 and 7 storeys with a 2 storey basement underneath). Building 1 has a larger footprint, particularly at ground and first floor, with an L-shaped form at the upper levels (floors 2-7). It would have a height of 7 storeys facing Highgate Road with the building increasing up to a maximum of 8 storeys following the slope of the land. The first floor would have a void to the front of the building to allow a lower height at street level. The upper floor (7th floor) would be setback significantly from the front elevation, with smaller setbacks on the side and rear elevations, behind a landscaped buffer zone and amenity terraces for the residential units. Building 2 would have a rectangular form and a height of 6 storeys fronting Highgate Road with a maximum height of 7 storeys. The upper floor (6th floor) would have a significant setback from the front and rear elevations with smaller setbacks from the sides. The buildings are predominately brick on their true storeys and the upper most floors would be finished in reconstituted stone. The other materials and treatments include precast cladding, aluminium frames, timber panels and glass balustrades.

2.8 The basement would have two storeys, a footprint of 2,174.39m² taking up the vast majority of the site and a maximum depth of 7.9m below ground level. Level -1 would have a net internal area of 1,768m² and level -2 would have an area of 2,030m². The basement would include plant and storage space for the self-storage business.

2.9 The existing self-storage unit that exists on the site (A&A Self-Storage) would be re-provided within the new proposal on the ground floor of Building 1 plus the 2 basement levels. The main reception area and offices would front Highgate Road with the car park (10 spaces) and servicing area for customers accessed from Greenwood Place. The new area would exceed the existing provision and be of superior quality.

- 2.10 Office space (B1a) is proposed on the second and third floors of Building 1. It would benefit from an external amenity terrace at second floor level with an area of 215m².
- 2.11 A social enterprise 'community' café (A3) is proposed to the south eastern corner of the site at street level (within Building 2). It is proposed that this would be delivered to Camden under specific requirements as set out within a S106 Agreement. The café would be closely linked to the Greenwood CIL and would provide training and employment experience for its users. The café would be provided to the Council on a 125-year lease on a peppercorn rent basis (to be secured via S106) following the practical completion of the building.
- 2.12 The proposal includes 60 units in total with 52 being market and 8 affordable. The affordable units would comprise 8 assisted living units that would be fitted out in a bespoke fashion to fit the needs of the end user and would be transferred to the Council on a 125-year lease at a peppercorn rent (to be secured via S106). All of the units within the proposal benefit from external amenity space. A private access to the ground floor affordable units within Building 2 is provided through a pathway between the building and the adjacent church. The pathway would be named Church Walk.
- 2.13 A new pedestrian walkway is proposed through the middle of Buildings 1 and 2. It would provide a safe, accessible public route from Highgate Road to the proposed new Greenwood CIL on Greenwood Place. The route through would have high quality paving with directional and coloured elements leading towards the centre, creating a visual link between the route and the building at the end.

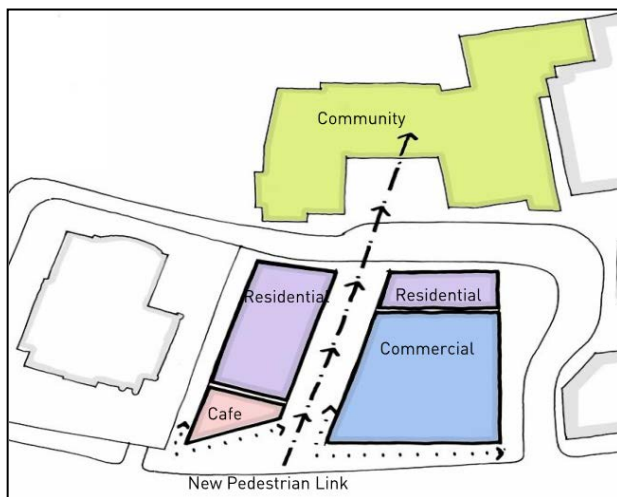


Figure 2 (left): The proposed pedestrian link from Highgate Road through to Greenwood Place. The plan shows the ground floor uses.

- 2.14 Overall, 177 cycle parking spaces would be provided:
- 8 x Sheffield Stands in front of the buildings on Highgate Road (short-stay/visitor spaces)
 - 4 x Sheffield Stands on the side of Building 1 on Greenwood Place (short-stay/visitor spaces)
 - 14 x double stacked/Josta spaces within the ground floor A&A Self-Storage car park

- 4 x double stacked/Josta spaces within the ground floor A&A Self-Storage reception
- 20 x double stacked/Josta spaces for residential use on the first floor of Building 2
- 44 x double stacked/Josta spaces for residential use on the first floor of Building 1
- 26 x double stacked/Josta spaces for office use on the first floor of Building 1
- 57 x dedicated cupboards for cycle storage within the market units

2.15 The roof of Building 1 would include a brown roof, photovoltaic (PV) panels and plant equipment. Building 2 includes a green roof and a vent/extraction fan for the café and plant.

2.16 An 'A&A' sign is included on the side elevations of Building 1 to label the proposed A&A Self-Storage business. It would be recessed in brick within the elevations and non-illuminated. The details on the drawing are indicative and would be secured by condition.

Revisions

2.17 Formal revised drawings were submitted on 11/05/2017. The changes are summarised below:

- The visitor's cycle parking on Highgate Road was amended to be Sheffield stands
- Additional visitor's cycle parking was provided on Greenwood Place
- Further cycle parking was provided for the A&A Self-Storage use
- Detailed drawings of the entrances, shopfronts, windows, balconies, attic storeys, apertures and elevations were submitted
- The front building line of Building 2 was setback and realigned to improve its relationship with the adjacent listed church
- The ground floor assisted living units access to the main communal residential entrance in Building 2 was removed to ensure that they would not be liable for service charges
- The recessed entrance for Building 1 was reduced to prevent loitering and anti-social behaviour
- The corner balconies on floors 2-5 of Building 2 were amended to fill in the void with solid on the elevation facing the adjacent church
- The sixth floor terraces on Building 2 were setback from the front, sides and rear with landscaped buffer zones introduced
- The seventh floor terraces on Building 1 were setback from the front, sides and rear with landscaped buffer zones introduced
- PV panels were added to the roof of Building 1 and the plant was setback further from the Highgate Road frontage
- Obscure glazing was added to windows within the side elevation facing Linton House
- The southeast elevation of Building 2 was refined to improve its relationship to the adjacent listed church. Balustrades were made solid, window openings were reduced in width and the balcony openings on the corner with Highgate Road were made solid to create a more reserved elevation

3. RELEVANT HISTORY

Greenwood Centre (25-37 Greenwood Place) and Highgate Centre (19-37 Highgate Road)

- 3.1 **2013/5947/P:** Planning permission was granted for the demolition of the existing buildings and redevelopment to provide a new Centre for Independent Living (D1) comprising 3 storeys (plus basement) at Greenwood Place; a part 5 part 7 storey mixed-use development at Highgate Road comprising 42 residential units (including 8 supported affordable housing units) and 100m² social enterprise in flexible retail, restaurant/café, office or community use (A1/A3/B1/D1) at ground floor level along with highway improvements to Greenwood Place and associated plant, landscaping, servicing and disabled car parking. The development was granted on 18/06/2014 with a shadow section 106 legal agreement. Construction has commenced on the centre on Greenwood Place. Whether the remainder of the scheme will be implemented (i.e. the development fronting Highgate Road) is dependent on the outcome of the current scheme. Council Officers in the CIP projects team have confirmed that if the current scheme were not to go ahead then this scheme would need to be built. The building of the residential development would be fundamental to fund the costs needed for the Greenwood CIP.
- 3.2 **2015/3151/P:** A minor material amendment was approved to vary the above permission (2013/5947/P) for the Greenwood CIL building on 29/07/2015. The amendments to the original permission include alterations to the internal reconfiguration; reduction in building footprint; increase in basement to provide hydrotherapy pool and plant; new glazed walkway and other minor external changes.
- 3.3 **2016/0936/P:** A non-material amendment was approved to vary the above permission (2013/5947/P) on 12/05/2016. The amendments include the relocation of the café within the Greenwood CIL to a more prominent location within the building.

Raglan House, 1 Raglan Street

- 3.4 **2013/6025/P:** Planning permission was granted for change of use from day centre (D1) to provide 5 residential flats along with associated external works on 18/06/2014. The existing facilities are intended to be transferred to the new purpose-built facilities at Greenwood CIL (approved under 2013/5947/P).

People's Centre for Change, 96-98 Shoot-up Hill

- 3.5 **2016/0697/P:** Planning permission is currently being considered for the change of use from day care centre (D1) to 6 residential flats including a replacement 2 storey rear extension, porch and associated external works. The existing facilities are intended to be transferred to new purpose-built facilities at Greenwood CIL (approved under 2013/5947/P). The application was deferred by the Planning Committee on the 12th of April 2016 due to insufficient information. Members were

concerned with the consultation on the application (regarding the provision of housing) and that the replacement community facility at the Greenwood CIL is not a suitable replacement (due to its location and lack of direct transport links from Shoot-up Hill). More details regarding whether sufficient time was allowed for service users to buy the site was requested.

4. **CONSULTATIONS**

Statutory Consultees

- 4.1 Historic England on 03/10/2016 – Confirmed that the Council should determine the application in accordance with national and local policy guidance.
- 4.2 Historic England GLAAS on 17/10/2016 – The site lies within the Kentish Town Archaeological Priority Area, which defines an area of medieval settlement. The submitted Historic Environment Assessment (MOLA, May 2016) indicates that the main potential is for palaeoenvironmental remains associated with a tributary of the ancient Fleet River and the footings or foundations of post-medieval buildings. The proposed development includes a basement across the entire footprint of the site, which could remove any potential archaeological remains. A condition is therefore recommended to require a two stage process of archaeological investigation comprising - first, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation.
- 4.3 Thames Water on 18/10/2016 – a number of comments and suggestions were made:
- 'Grampian Style' condition was recommended to secure a drainage strategy detailing any on and/or off site drainage works.
 - Preferred option would be for all surface water to be disposed of on-site using SUDs as per policy 5.13 of the London Plan.
 - Applicant should incorporate protection to the property by installing, for example, a non-return valve or other suitable device to avoid the risk of backflow at a later date, on the assumption that the sewerage network may surcharge to ground level during storm conditions.
 - There are public sewers crossing or close to the development. Approval should be sought from Thames Water where relevant.
 - A groundwater informative was recommended that would be attached to the decision notice.
 - A flow rate informative was recommended that would be attached to the decision notice.
 - A planning condition requiring a piling method statement was recommended that would be attached to the decision notice.
 - The site falls within the highly flood sensitive Counters Creek catchment, surface water attenuation for Greenfield run-off rates is expected as a minimum. A site drainage strategy is required that clearly identifies the point(s) of connection to the public sewer for foul and surface water for both the pre- and post- development scenario, including peak discharge rates for each point.

Conservation Area Advisory Committee

4.4 N/A

Local Groups

4.5 Kentish Town Neighbourhood Forum (KTNF) on 04/11/2016 objection – confirmed that KTNF have no objection in principle to the redevelopment of this site and that they are pleased to note that in compliance with the Kentish Town Neighbourhood Plan (the Plan) the scheme provides for increased employment space and more housing. Despite this, the KTNF made the following objections/comments:

- 1) The residential element will not assist the vision of the Plan for a '*diverse but balanced population... in a mix of housing ranging from private to affordable*' (p.12 of the Plan)
- 2) The scheme does not sufficiently increase '*the availability of affordable housing*' (p.12 of the Plan)
- 3) Only 13% of the residential element in the scheme is social rented/affordable, substantially below the policies of Camden and the Mayor of London for 50-60%
- 4) The residential element in the scheme is substantially higher than in an earlier application, 42 units, without any increase in the number of social rented/affordable units
- 5) The design of the scheme does not comply with the Plan's design policies (D3)
- 6) The height, shape and massing of the proposed buildings do not contain the '*appropriate design cues*' (D3). The buildings are more than one floor higher than the neighbouring Maple Building and overall the mass of the scheme is too great for the site
- 7) The building line is further forward than in the past adding to the massing issue
- 8) The view of the church next door is obstructed by the scheme
- 9) KTNF would have liked to have been consulted further by the applicant on some design issues before the application was lodged, having raised the point in a meeting with the developer in April 2016
- 10) Assurance is required that there will be no mechanical plant, lift overruns, plant rooms, or other obstructions at roof level

4.6 Evangelist Road Residents Association on 10/11/2016 objection – The development as proposed should not be granted planning permission as it needs substantial revision and scaling down. Their objection is summarised below:

- **Scale:** primary concern is that the proposed buildings are of a scale that is out of keeping with existing buildings and will negatively impact the neighbourhood and streetscape. Building 1 is considerably higher than the adjacent Linton House, including the recently constructed penthouse level. The massing on the Highgate Road frontage is also considerably greater and gives an impression of overbearing dominance. Building 2 is substantially higher than the body of the church to the south and the solid massing is out of keeping with the openness of the church with its spires.

This also results in a feeling of dominance. The new Greenwood Place Centre for Independent Living will also suffer from the proximity of the buildings of such height and massing, giving a sense of enclosure as well as dominance.

- **Overbearing and outlook:** The proposed development will present a dominant and overbearing aspect for the residents of Elsfield, directly opposite, thus damaging their outlook and amenity. In addition, their light will be significantly reduced, as is detailed in the Daylight survey submitted with the application.
- **Urban landscape:** Highgate Road is a heavily trafficked road that currently presents a harsh urban environment. The small green space, which currently exists on the site, will be built on, and the half dozen trees/shrubs outside the Highgate Centre will be removed. There is no attempt in these plans to provide any landscaping improvements, for example the inclusion of trees, on the Highgate Road frontage. This should be an opportunity to improve the streetscape – something that is desperately needed on this lower stretch of Highgate Road.
- **Affordable/social housing:** It is unacceptable that there is such a small proportion of social housing in this development when there is such a need for affordable accommodation. Eight assisted living units out of a total of 60 is totally unacceptable and goes against Council guidelines.
- **Traffic:** A development of this size will create a substantial amount of traffic from deliveries, maintenance personnel and visitors. There is no provision on-site for such traffic and the local streets are already too full. It is not only residents who have permits but local businesses. Any new businesses in the development should not be allowed to purchase a permit or visitors permits.
- **Local infrastructure:** With the proposed 60 new units, this will increase demand for the already stretched services in the area. Already the doctors and schools are oversubscribed. What provision is proposed to cope with the additional residents?
- **Renewable energy:** There is no provision for generation of renewable energy proposed on the site. Camden should seek to encourage the developers to use the extensive roof space for solar panels.

Adjoining Occupiers

| | |
|---|--|
| <i>Number of letters sent</i> | 4 originally, then 14 as part of re-consultation |
| <i>Total number of responses received</i> | 14 |
| <i>Number in support</i> | 0 |
| <i>Number of objections</i> | 14 |

4.7 In addition to letters to adjoining occupiers, a press release was made on 07/10/2016. Three site notices were displayed from 04/10/2016; these were displayed in front of the application site, on the opposite side of Highgate Road and to the front of Linton House. Following the submission of revised plans and an amended application form on 11/05/2017, letters were sent to all those who were originally consulted and those that made written representations and included their address. Three further site notices were displayed from 17/05/2017. One objection

was received following re-consultation, from a resident at 4 Evangelist Road who objected as part of the original consultation. The objector confirmed their original objection to the scheme.

Applicant's own consultation

- 4.8 The applicant organised a public exhibition, which took place on the 8th December 2015 at the Kentish Town library to display and explain the emerging proposals to local residents. 29 people attended the exhibition, including a local councillor, members of local amenity groups, residents and business owners from the neighbouring streets. Six responses were submitted at the exhibition and further emails and written correspondence were received.
- 4.9 A Development Management Forum, organised by Council officers, was held on 8th of March 2016 at the Ingestre Road Community Centre. There were 15 members of the public present at the meeting, which included an overview of the site, an explanation of the emerging plans and a Q&A session.
- 4.10 Following the above, a follow up session was arranged with representatives of the Kentish Town Neighbourhood Forum (KTNF) on the 14th of April 2016 at The Forum on Highgate Road.
- 4.11 A meeting took place with the owners/operators of The Forum on the 3rd of March 2016.
- 4.12 Finally, the scheme was presented to Councillors and officers at a Developer's Briefing on 26th April 2016.
- 4.13 Feedback from the various consultations is included within the Statement of Community Involvement that was submitted as part of the application. The principal issues related to the quantum of affordable housing, the scale/massing of the proposed buildings, landscaping and access/servicing. As a result of the applicant's own consultation they made significant changes to the scheme, including the reduction of the height and massing of the proposed buildings along with to the detailed design and materials; an enhanced landscaping scheme associated with the public realm to give a greener feel and further work to ensure that the servicing arrangements are robust.

Objections received

- 4.14 14 objections were received in addition to those outlined in paras 4.1-6 above. They were submitted by residents from Lady Somerset Road, College Lane, Burghley Road, Evangelist Road, Alma Street, Fortess Road and The Maple Building (formally Linton House), 39-51 Highgate Road. Detailed letters were also received from the Academy Music Group (who own The Forum at 9-17 Highgate Road) and Savills on behalf of Norman Linton (Holding) Ltd (freeholder of The Maple Building).

Academy Music Group on 03/11/2016 (with Acoustic Report attached) objection

- 4.15 Concerned regarding the impact of the proposed development on the operation of The Forum, which is a very popular and lively music and entertainment venue. Summary of concerns:

- The addition of new residential accommodation would result in an acoustically sensitive residential use being located in close proximity to The Forum. Noise levels could result in complaints from prospective occupiers who could take action, which would have a negative impact on its operation.
- The existing business should not have restrictions placed upon them that could affect their operation. Any new development should be appropriately mitigated to protect The Forum from complaints.
- An Acoustic Report was commissioned and paid for by the applicant on behalf of The Forum. The report, attached to the objection letter, suggests that amendments need to be made to the proposal, including glazing to certain areas of the development, to ensure noise levels are acceptable.
- The Academy Music Group confirmed that they are in discussion with the applicant to ensure that an agreement is reached so the uses can co-exist. Until an agreement is reached they have no option but to object to the proposal.

Letter from Savills on behalf of Norman Linton (Holding) Ltd (freeholder of The Maple Building) objection

4.16 The adjacent building (northwest) to the development at 39-51 Highgate Road (renamed The Maple Building, formally known as Linton House) has recently been converted into residential use and extended at roof level under a series of planning applications and prior approvals (permitted development). While the freeholder of The Maple is not averse to the development taking place, a number of concerns have been raised in relation to potential impact on the amenity and quality of life of the prospective occupiers within the building (summarised):

- **Overlooking and privacy:** Potential for overlooking of the terraces and windows on the upper levels of The Maple Building from the top floors of the proposal. The additional height of the proposal would allow residents to look down into the terraces, bedroom windows and living room windows within The Maple Building. The distance across Greenwood Place is predominantly between 9-12m. The terraces proposed for the top floor should be removed or setback with screening.
- **Daylight/sunlight:** The submitted report has inconsistencies. The floor plans of the residential layouts of The Maple Building that are attached at Appendix 4 of the report do not reflect those layouts that have been built out. It is claimed that the light enjoyed by the nearest habitable rooms in The Maple Building will not be materially affected by the proposed development because the windows serve a dining space with windows on several elevations. This is not correct – the windows of the nearest elevation serve both bedrooms and living rooms. As such, the claim made that the internal space is served by multiple windows is also incorrect. The submitted report by the applicant refers to three residential floors within The Maple Building. This is also incorrect – residential accommodation has been developed in accordance with approvals on the first, second, third and fourth floors of the existing building as well as the new storey at roof level (five residential floors in total). The lowest floors of residential accommodation have not been assessed. Therefore, the daylight/sunlight analysis should be run again to both reflect the correct residential layouts and assess all residential floors.

- **Outlook and enclosure:** There would be an enclosure of the lower floors of The Maple Building due to the additional massing along the northern flank of the development site. The extant permission under 2013/5947/P limits the seven-storey development to the Highgate Road frontage (i.e. effectively alongside The Maple Building), the current proposal maintains a similar massing along the entire Greenwood Place frontage. This further massing would sit very close to the residential windows of The Maple Building, which would significantly alter the outlook from The Maple Building compared to the extant development proposal.

Summary of other objections

4.17 The objections received from surrounding occupiers are summarised below:

Height/bulk/design/heritage

- Development would overshadow area
- Would harm the setting of the adjacent listed church, The Forum and other listed buildings on the road
- Scale and height is huge and would tower over existing and surrounding buildings (including adjacent church and Linton House) and be out of character with the streetscene
- Heritage Statement is insufficient and does not adequately assess the proposal
- The frontage is too large
- Sense of enclosure, overshadowing and increased urban feel to Highgate Road. Would also affect adjoining roads (i.e. Burghley Road)
- Building line too close to edge of pavement increasing sense of enclosure/claustrophobic effect

Residential amenity

- Loss of outlook, views of skyline and light
- Overlooking, loss of privacy, loss of light, loss of property value, sense of enclosure, overbearing to occupiers with Linton House
- Light pollution
- Loss of views from Fortress Road to the southwest
- Future living conditions of residents within the development would be undesirable due to noise and traffic from Highgate Road, surrounding railway lines and nearby works yard
- Noise and general disturbance through the construction process

Land use

- Do not need more luxury flats dominating the landscape
- The existing building (Highgate Centre) serves a useful purpose
- Loss of community space (D1 use)
- Lack of affordable housing
- Infrastructure is stretched and more is required due to increase in population for this and other developments – schools, doctor's surgeries, hospitals, transport buses, local services etc.

- Community Café should be conditioned to provide education and supported employment and permitted development rights should be removed. Without this would be an inappropriate use

Transport and parking

- Little regard to increase traffic especially given the small single road (Greenwood Place) that serves it
- Would generate a lot of traffic, noise, disruption and pollution
- A S106 for car-free would be unenforceable
- Added pressure on already strained public transport

Natural environment and sustainability

- Little regard for green development, climate change, nature, green landscaping or renewable energy
- Local water infrastructure does not have enough capacity to accommodate the development. SUDs does not seem practical
- The application form claims there are no trees or hedges on site. Accordingly, consent is not applied for in respect of development operations involving the removal of any trees or hedges. There are in fact several trees and hedges on site and the grant of permission should make clear that their removal is not permitted

Other

- Benefits from the Development Agreement are not relevant to the Local Planning Authority who must make their decision based on the planning merits of the application
- Bin stores sited in a poor location that would have safety issues from reversing vehicles
- Narrow alleyway to social housing would provide poor observation, facilitate break ins and encourage anti-social behaviour. Its construction would harm the setting of the adjacent listed church
- Signage on building is inappropriate and would unacceptably draw the attention of drivers on this busy road
- Walkway between the buildings would be attractive to criminals and for anti-social behaviour. Adequate provisions should be provided to arrange for upkeep of the area
- Proposal would include a large area of storage with no practical control over what is stored, how flammable it is, other hazardous substances etc. It is undesirable under residential accommodation
- Consultation did not include community café (A3) use in description and the postcode for 19-37 Highgate Road was incorrect

5. **POLICIES**

- 5.1 Set out below are the LDF policies that the proposals have primarily been assessed against. It should be noted that recommendations are based on the assessment of the proposals against the development plan taken as a whole together with other material considerations. In making the recommendations, account has been taken of all relevant statutory duties including section 38(6) of the Planning and

Compulsory Purchase Act 2004 and section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

LDF Core Strategy and Development Policies

- CS1 – Distribution of growth
- CS4 - Areas of more limited change
- CS5 – Managing the impact of growth and development
- CS6 - Providing quality homes
- CS7 – Promoting Camden’s centres and shops
- CS8 – Promoting a successful and inclusive Camden economy
- CS10 - Supporting community facilities and services
- 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 and encouraging biodiversity
- CS16 - Improving Camden’s health and well-being
- CS17 - Making Camden a safer place
- CS18 - Dealing with waste and encouraging recycling
- CS19 - Delivering and monitoring the Core Strategy
- DP1 - Mixed use development
- DP2 - Making full use of Camden’s capacity for housing
- DP3 - Contributions to the supply of affordable housing
- DP5 - Homes of different sizes
- DP6 - Lifetime homes and wheelchair housing
- DP12 – Supporting strong centres and managing the impact of food, drink, entertainment and other town centre uses
- DP13 – Employment premises and sites
- DP15 - Community and leisure uses
- 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
- DP27 - Basements and lightwells
- DP28 – Noise and vibration
- DP29 – Improving access
- DP30 - Shopfronts
- DP31 - Provision of, and improvements to, public open space and outdoor sport and recreation facilities
- DP32 - Air quality and Camden’s Clear Zone

5.2 Supplementary Planning Policies

Camden Planning Guidance (CPG)

- CPG1 Design 2015
- CPG2 Housing 2015
- CPG3 Sustainability 2015
- CPG4 Basements and lightwells 2015
- CPG5 Town centres, retail and employment 2013
- CPG6 Amenity 2011
- CPG7 Transport 2011
- CPG8 Planning obligations 2015

Kentish Town Place Plan, February 2012

Kentish Town Neighbourhood Plan 2015

Policies D3 (Design Principles); D4 (Non-Designated Heritage Assets) and SP2 (Kentish Town Potential Development Area).

Camden Site Allocations Local Development Document 9th September 2013 (Proposal Site 39)

Intermediate Housing Strategy (HASC/2016/08)

5.3 **London Plan 2016**

5.4 **National Planning Policy Framework**

On 27th March 2012, the Government published the National Planning Policy Framework (NPPF). The policies contained in the NPPF are material considerations, which should be taken into account in determining planning applications.

5.5 **Camden Local Plan Submission Draft 2016**

The Inspector's report on the Local Plan was published on 15 May 2017 and concludes that the plan is 'sound' subject to modifications being made to the Plan. While the determination of planning applications should continue to be made in accordance with the existing development plan until formal adoption, substantial weight may now be attached to the relevant policies of the emerging plan as a material consideration following publication of the Inspector's report, subject to any relevant recommended modifications in the Inspector's report.

Policies: G1 Delivery and location of growth, H1 Maximising housing supply, H2 Maximising the supply of self-contained housing from mixed-use schemes, H4 Maximising the supply of affordable housing, H6 Housing choice and mix, H7 Large and small homes, C1 Improving and promoting Camden's health and well-being, C2 Community facilities, culture and leisure, C4 Safety and security, C5 Access for all, E1 Promoting a successful and inclusive Camden economy, E2 Employment premises and sites, A1 Managing the impact of development, Policy A2 Provision and enhancement of open space, A3 Protection, enhancement and management of biodiversity, A4 Noise and vibration, A5 Basements and Lightwells, D1 Design, D2 Heritage, D3 Shopfronts, CC1 Climate change mitigation, CC2 Adapting to climate change, CC3 Water and flooding, CC4 Air quality, CC5 Waste, TC2 Protecting and enhancing Camden's centres and other shopping areas, T1 Prioritising walking,

cycling and public transport, T2 Car-free development and limiting the availability of parking, T3 Improving strategic transport infrastructure, T4 Promoting the sustainable movement of goods and materials, DM1 Delivery and monitoring.

6. ASSESSMENT

6.1 The principal considerations material to the determination of this application are summarised as follows:

- 7. Land Use
- 8. Housing Mix, Unit Size and Quality of Accommodation
- 9. Affordable Housing
- 10. Design, Conservation and Heritage
- 11. Basement
- 12. Neighbouring Amenity
- 13. Transport and Access
- 14. Nature Conservation and Biodiversity
- 15. Sustainable Design and Construction
- 16. Air Quality
- 17. Trees and Landscaping
- 18. Flooding and Drainage
- 19. Community Safety
- 20. Waste
- 21. Local employment and procurement
- 22. Play and Open Space
- 23. Contaminated Land
- 24. Archaeology
- 24. Other Matters
- 25. Section 106, s.16 of the Greater London Council (General Powers) Act 1974 Obligations and other local authority powers
- 26. Community Infrastructure Levy (CIL)

7. Land Use

Existing situation

7.1 The site lies within Kentish Town and comprises the Highgate Centre at 19-37 Highgate Road (Council owned) and the A&A Self-Storage building (formerly Lensham House) at 19 Greenwood Place. Kentish Town is one of the nine place shaping areas along with Kings Cross, Euston, Camden Town, Gospel Oak, St Giles to Holborn, Swiss Cottage, West Hampstead and Kilburn where 'Place Plans' have either been prepared or are in preparation, and which are considered to be the areas of greatest opportunity for investment. The Highgate Centre forms part of a proposed development with the Greenwood Centre under 2013/5947/P. It was noted within the Committee Report on that application that ideally the opportunity would be taken to include the A&A Storage building within a comprehensive redevelopment (as per the Site Allocation Plan - Site 39) for a mixed-use scheme including community and industrial uses. The Council does not own the A&A Self-

Storage building and was therefore unable to bring forward the three sites as part of a comprehensive redevelopment package. The Greenwood Centre, which does not form part of this application, is being implemented independently by the Council's Adult Social Care service under the extant permission. The current application has the benefit of creating a more comprehensive scheme across the Highgate Centre and A&A Storage sites that would allow the creation of a direct pedestrian access from Highgate Road to the new Greenwood Centre for Independent Living (CIL), and for the expansion of employment floorspace and further residential in addition to the emerging community facilities.

- 7.2 The Highgate Centre is a Council-owned site with a D1 use. It runs group work psychotherapy-orientated Pathways Service providing practical and emotional support and is part of the Camden and Islington NHS Foundation Trust. The Centre is currently open and providing day care resources for adults with special needs. The Council's plan is for it to continue providing services until the Greenwood CIL is constructed and open. The service will then move to the Greenwood CIL, most likely in late 2018. Subject to gaining planning permission, once the Highgate Centre is vacated the applicant would take possession of the site and commence building out their scheme.
- 7.3 The A&A Self-Storage building includes two storeys of the self-storage (B8) business with office space (B1a) on the upper floor. The self-storage company provides secure storage for domestic and business purposes on the lower floors. In addition, they lease fully serviced offices on the upper floor at weekly rents that are inclusive of business rates and utilities. This includes space for established businesses and start-ups and occupiers are usually local companies on short-term leases. The company A&A Self-Storage currently own and operate two other North London self-storage sites at King's Cross and Watford. They are seeking to remain on the application site after the proposal is built out and expand their existing business.

Community facility

- 7.4 Policy DP15 of the Council's Development Policies and CS10 of the Core Strategy work in conjunction with one another to ensure a range of community facilities are provided to support Camden's growing population and that a range of suitable premises are provided. DP15 seeks to protect existing community facilities by resisting their loss unless a replacement facility is provided that meets the needs of the local population. Policy C2 of the emerging plan states that the Council will ensure that community facilities and services are developed and modernised to meet the changing needs of the community and reflect new approaches to the delivery of services.
- 7.5 The decanting of the Highgate Centre and other community facilities to the Greenwood CIL are part of a wider scheme that is being led by the Council's Property Services working in close collaboration with Adult Social Care service commissioners and Housing. The Greenwood CIL forms part of the Council's Community Investment Programme (CIP), which seeks to make the best use of the Council's land and property to enable needed investment in its schools, homes and community facilities. As part of this programme the Council has been looking at the way it provides services for people with learning difficulties, disabilities and mental

health problems and engaged in a process of consultation with residents and user groups. The redevelopment of the Greenwood Centre and the Highgate Centre to provide the new purpose built Greenwood CIL was agreed at the Council Cabinet meeting of 18th April 2012. It also includes facilities to replace the Raglan Centre and the New Shoots service at Shoot Up Hill. The New Shoots day care facility is still in operation. A planning application is still ongoing under 2016/0697/P for the conversion of the community facility into 6 residential flats. Justification for this change of use included that the facilities would be relocated into the Greenwood CIL. The application was deferred from the Planning Committee on the 12th of April 2016 as Members were concerned regarding the lack of consultation on the proposal to convert the proposal to private housing. They also requested further information regarding the existing users and how the Greenwood CIP would cater to their needs. More time is being given to allow specific community groups to respond to further consultation.

- 7.6 The proposals go beyond simply re-providing existing facilities but include provision for services that do not currently exist in Camden such as support for younger people with profound and multiple learning disabilities and autism. They also comprise Camden's first CIL – Centre for Independent Living, which would give people with disabilities a centre for advice, guidance and support, with the latest equipment and technology to help people live more independently. Facilities and spaces will be included that can be used by all of the community such as a café or juice bar and meeting rooms for hire. The intended opening date of the Greenwood CIL is 2018 whereupon the existing services at the Highgate Centre, Shoot Up Hill and the Raglan Centre would cease and their buildings would be released for sale.
- 7.7 The Highgate Centre has a floor area of 795m² including staff areas and provides mental health services. The proposed dedicated space in the Greenwood CIL, which is currently being constructed, would be 373m² with its own separate entrance. In addition, there would be access to 1,616m² of shared CIL space, kitchen and staff areas. The recovery-focused services would continue in the new centre benefiting from new facilities and opportunities for training, adult education, supported employment and leisure activities. Therefore, the functions and facilities are re-provided as well as there being an increased range in facilities offered and numbers of service users catered for. The requirement of policy DP15 part c) to provide a replacement facility would therefore be met. It is also relevant to note that the loss of the Highgate Centre has been approved in principle through 2013/5947/P and the works to redevelop it could take place as that permission is extant.

Mixed-use development

- 7.8 Policies DP1 of the Development Plan and H2 of the emerging plan require a mix of uses in development in all parts of the borough, where appropriate, including a contribution towards the supply of housing. The application site does not lie within the Central London Area or one of the specified town centres within the policy. Despite this, a mixture of uses is required given the size of the new build development and a significant contribution of housing is expected, if appropriate. Policy H2 seeks to maximise the supply of self-contained housing from mixed-use schemes.

7.9 The proposal would deliver a mix of uses including new residential accommodation (C3), extended self-storage space (B8), additional office (B1a) and a new community café (A3). The overall increase in floorspace would be 11,485m² (GEA) which is comprised of the following (all figures in GEA and relate to the uplift in floor area):

- Residential (C3): 7,934m² (69.1%)
- Self-storage (B8): 2,401m² (20.9%)
- Offices (B1a): 1,035m² (9%)
- Community café (A3): 115m² (1%)

7.10 The proposed development provides a mixture of uses including a large quantum of housing which accounts for the vast majority of the proposal. The provision of a significant contribution to housing is in line with the borough's aims of providing residential as the priority land use. Furthermore, the existing employment based uses are being retained, increased and enhanced.

Employment space

7.11 Camden policy, including emerging policies E1 and E2, seeks to retain land and buildings that are suitable for continued business use and recognises that the borough has a very restricted supply of sites and premises suitable for light industrial, storage and distribution uses. CPG5 (Town Centres, Retail and Employment) identifies three main categories of business/employment sites and premises in the borough. The existing employment space (the A&A Self-Storage site) is considered to be category 1, which is the highest quality of purpose built accommodation that is rare within Camden and will always be protected. The Site Allocations Document states that any proposal should support the successful function of the borough's designated industrial area while ensuring that it does not prejudice the operations of existing or future business occupiers by introducing inappropriate or conflicting uses. Any redevelopment should minimise the loss of B1 and B8 uses, and should be used to consolidate and improve the business environment, such as new modern floorspace and enhanced servicing.

7.12 The proposed development includes an increase in floorspace of the existing B8 use on site from 2,800m² to 5,201m²; an increase of 2,401m² (all figures GEA). The B8 use would be for the existing self-storage business (A&A Self-Storage) and include a shopfront/reception, car park and servicing area within the ground floor of Building 1, and two floors of storage (for customers) within the basement. The existing occupier would be accommodated on-site with a significant uplift in floorspace that would be of superior quality. The storage areas would be subterranean which would be a more efficient use of space as these areas do not require natural daylight, sunlight or ventilation. Officers consider that the continued use as a self-storage centre would be compatible with the other uses on-site given that heavy machinery and industrial processes are not required. The main activity would be customers delivering, visiting and removing their goods from storage and the impacts are unlikely to be greater than uses within the B1 use class. It is recognised that the broader range of uses within the B8 (Storage and Distribution) use class includes wholesale warehouses, distribution centres and repositories which could potentially harm the amenity of prospective occupiers through noise

and general disturbance. To prevent this from occurring, any planning permission would be subject to a condition limiting the B8 use to a self-storage centre only.

- 7.13 The existing office space (B1a) would be retained and increased in size from 997m² to 2,032m² (uplift of 1,035m²) to provide employment space on the second and third floors of Building 1. The proposed office provision would be significantly upgraded to a modern standard with a second floor amenity terrace, a dedicated entrance, cycle storage, and toilet/changing/showering facilities. Areas and rooms of a variety of sizes would be provided with the floor area flexible for co-working and small and medium-sized enterprises (SMEs). The applicant is expected to let out the proposed floorspace, largely in the way it currently does on the basis of short-term and flexible leases to local companies. All-inclusive charges including rent, rates, insurance and service charges would be continued. Economic Development welcome the additional employment space and advised that local companies value flexibility in terms of tenancy options and have expressed an interest in the employment floorspace that would be provided through the scheme. In response, Officers recommend the use of the S106 to secure flexible office space, with a range of unit sizes and tenancy/license terms, which are suitable for SMEs and include a commitment to marketing the space locally.
- 7.14 The significant increase in employment floorspace and the resulting quality and type of spaces provided is in accordance with the Council's Core Strategy and Development Plan, which sets out the need to protect and enhance existing employment sites while meeting the needs of modern industry and encouraging a mix of employment facilities and types.

Community café

- 7.15 A 'community' café (use class A3) is proposed within the ground floor of Building 2. It would front Highgate Road and create an active frontage for the building whilst also marking the entrance to the pedestrianised public route through the site. The café would be transferred into Council ownership and be used in association with the Greenwood CIL. It would provide training and employment to users of the centre. Officers consider this use to be acceptable in terms of it activating the street frontage and by providing additional facilities to enhance the new centre being constructed on Greenwood Place. The transfer of the proposed 'community' café would be secured as part of the land transfer between the developer and the Council (as landowner) and its planning use (as a 'community' café) would be secured under the S106 legal agreement.

Proposed residential use

- 7.16 The application proposes 60 self-contained residential flats and an additional 7,934m² (GEA) of residential floorspace. The provision of additional residential floorspace within the borough is strongly supported by policies CS6 and DP2, as well as emerging policy H1, which highlight the need to maximise the supply of housing. The principle of the redevelopment of the site to include a significant uplift in housing has already been granted under 2013/5947/P, which allowed 42 units. The Site Allocations Document states that any development of these sites would be expected to '*optimise opportunities for residential accommodation, including affordable housing*'.

Housing density

- 7.17 In order to make the most efficient use of land and meet the objectives of Core Plan policies CS1 and CS6 and emerging policy H1, higher density development is encouraged in appropriately accessible locations and there is an expectation that densities will be towards the higher end of the density ranges set out in the London Plan. The emphasis on higher density development is reinforced by policy DP2 of the Development Plan, but should at all times be subject to other policies such as those protecting resident and neighbour amenity and securing the height, scale and massing appropriate to an area in terms of good design.
- 7.18 London Plan Policy 3.4 sets out the considerations for determining appropriate density levels for sites. Using Table 3.2 (density matrix) of the London Plan the local built environment characteristics are identified as 'urban' and the site has a PTAL rating of 6a (excellent). The proposed development would provide 60 units, with the number of habitable rooms 164, across a site footprint of 0.27ha (approx. 2,700m²). This equates to a density of 222 units/ha and 607 habitable rooms/ha which falls within the upper range of the density matrix within the London Plan for 'urban' sites (70-260 units/ha and 200-700 habitable rooms/ha).
- 7.19 Paragraphs 1.3.69-1.3.72 of the Mayor's Housing Supplementary Planning Guidance (SPG) March 2016 provides guidance for calculating density in vertically mixed schemes (i.e. where housing is on top of non-residential uses). It states that it may be appropriate for the size of the site to be reduced, in accordance with the proportion of non-residential uses, before calculating residential density. The proposed development includes a two-storey basement of self-storage (B8) use that extends across the entire footprint of the site. Therefore, it would not be appropriate to use this method for calculating the residential density as it would result in a misrepresentation of the actual plot ratio due to the large percentage of the non-residential floor area lying below ground. A more usual comparison is against the extant permission under 2013/5947/P, which provided 42 units over the Highgate Centre part of the site. The proposed scheme would include the A&A Storage property to the rear and provide a total of 60 units, a similar sized community café and 6,158m² of employment space. While the residential density of the proposed development would be lower than that under 2013/5947/P, which had a much higher density of 910 habitable rooms per hectare, the significant contribution of employment space is welcomed.

Conclusion

- 7.20 Overall, the proposed development is considered to have an appropriate mixture and density of uses for the site that would enhance the existing spaces while benefitting a number of the Council's policy objectives by contributing towards a successful economy while maximising the supply of housing.

8. Housing Mix, Unit Size and Quality of Accommodation

Housing mix

- 8.1 The proposed development would comprise 52 market units and 8 social rented (assisted living) units. Policy DP5 and emerging policy H7 seek to provide a range of unit sizes to meet demand across the borough. In order to define what kind of mix should be provided within residential schemes, policy DP5 includes a Dwelling

Size Priority Table which seeks the provision of at least 40% of market units to be 2 bed. 1-bed and studio units are of a lower priority and 3 bedrooms (or more) are medium priority. Similarly, table 1 of the emerging plan policy H7 considers 2 bedroom units to be of high priority, with 1-beds and studios having a lower priority. 3-bed units have a high priority with 4-beds or more being of a lower priority.

| Housing Mix Table for Proposal | | | | | |
|---------------------------------------|--------------|--------------|--------------|---------------|--------------|
| | 1 bed | 2 bed | 3 bed | 4+ bed | Total |
| Market units | 16 | 29 | 7 | 0 | 52 |
| Social rent | 8 | 0 | 0 | 0 | 8 |
| Total | 24 | 29 | 7 | 0 | 60 |

8.2 The proposed mix comfortably exceeds the target of 40% in the priority 2-bedroom size range for market housing by providing 55.8%. It is also in accordance with policy H7 which gives this unit size and tenure a high priority. A scheme of this size would normally be expected to achieve more 'medium priority' 3 bed or more sized units to be considered a balanced mix, and less of the lower priority 1 bed unit sizes. The emerging policy places less priority on larger units but considers 3 bedroom units to have a high priority. Policies DP5 and H7 acknowledge that it will not be appropriate for every development to meet the aims as set out in the priorities table. Account may be taken of the site size and any other constraints on including homes of different sizes. The character of the site and its surroundings, including its main road (Highgate Road) location and the semi-industrial nature of the surroundings, make the development site less readily suited to family type accommodation than smaller sized units. The inclusion of the 7 x 3 bedroom units (13.5% of the mix) is welcomed with some of these larger units, including flats 2.5.4 and 1.7.4, benefitting from large private amenity spaces. Overall, the provision is in accordance with both current and emerging policy as a mix of unit sizes are provided.

8.3 The constraints of the site, coupled with the opportunity to link in with the associated Greenwood CIL facilities in a practical way has informed the affordable mix which consists entirely of 1 bedroom supported units for social rent. The six ground floor units of the affordable housing are designed as fully accessible wheelchair accommodation while two further affordable units would be located on the first floor. The one bedroom unit type is ideally suited to the needs of the client group for supported living and is to the specification of the Council's Adult Social Care service. Affordable ground floor mobility units of this type are a particularly valuable contribution to Camden's housing stock as the opportunity rarely arises for such significant affordable units of this quality. The Housing Commissioning and Partnerships Team of HASC fully support the proposals.

8.4 Based on the above, the proposed unit mix is therefore considered acceptable.

Unit size

8.5 The Department of Communities and Local Government (DCLG) released nationally prescribed space standards in March 2015, which are now incorporated in the emerging Local Plan. The minimum gross internal floor areas are set by the number of bedrooms and bed spaces/occupiers in each dwelling. The development consists of 1 bed 2 person; 2 bed 4 person and 3 bed 6 person units which require

a minimum of 50m², 70m² and 95m² respectively. All of the units comply with the national standards and the majority of units comfortably exceed them. The average size of the 1-bed units is 64m²; the 2 beds have an average size of 94m² and the 3 beds 113m².

Quality of accommodation

- 8.6 The residential accommodation would occupy both of the proposed buildings – Building 1, the larger 8-storey building and Building 2, the smaller 7-storey building. A minimum distance of 8m is achieved between the buildings at the narrowest point and widens to 20m. Six of the assisted living units would be located on the ground floor. They would be set behind the commercial uses to provide a buffer from Highgate Road, have landscaped gardens fronting the new pedestrian route to provide defensible space, individual private amenity spaces and the units in Building 2 would have a private access way (named Church Walk) adjacent to the church. The first floor residential units of both buildings would benefit from a buffer from Highgate Road as they would be set behind voids. Building 1 contains market flats on floors 4-7 while the market units within Building 2 would occupy floors 1-6. The entrances to the residential cores have been arranged along the new route through the site. Secondary entrances to the assisted units are provided from Greenwood Place, the newly created private access way and the main pedestrian route. A secondary access to the rear core of Building 1 is located on Greenwood Place.
- 8.7 Layout, ventilation, ceiling heights – The general layout of the units is acceptable providing functional and practical spaces. The ceiling heights of the residential spaces are over the 2.4m minimum standards within CPG2 (Housing) with at least 2.5m per floor. All of the units have openable doors and windows (i.e. passive/natural ventilation) in addition to mechanical ventilation.
- 8.8 Daylight, sunlight, outlook and aspect – The site benefits from a good provision of daylight and sunlight given the setback, orientation and size of the adjacent church building; the location of Greenwood Place wrapping around the side and rear elevations along with the proposed height of the Greenwood CIL building to the rear; and the generous width of Highgate Road meaning the buildings on the opposite side are substantially setback. The layout of the flats allows over 90% to be dual aspect with the majority benefitting from south facing living rooms with balconies or terraces. A large number of the habitable rooms themselves are served by multiple windows with many being dual aspect. The provision of light and outlook for the units would be of a high standard due to their design, orientation and aspect. All residential units would benefit from full height glazing; the depth of all living spaces and bedrooms have been kept to a minimum thereby increasing the uniformity of light within the rooms; plant, circulation spaces and non-habitable rooms such as bathrooms have been contained within areas of the scheme where the daylight availability is lower, prioritising living spaces and bedrooms.
- 8.9 Amenity space – Private external amenity space in the form of balconies and roof terraces is provided for all of the units and exceeds the minimum requirements of the London Plan. The spaces are predominantly facing towards the listed church or Greenwood Place to ensure they are away from Highgate Road. Those units which have amenity space fronting Highgate Road are at an upper level and this is limited

to 13 of the 60 units. The uppermost amenity spaces on both buildings are setback behind landscaped buffer zones. Amenity spaces are not proposed on the elevation of Building 1 which would face the new and proposed residential units within Linton House, apart from the 7th floor level terraces which would be set behind landscaped buffer zones with further screening details conditioned.

- 8.10 Access and inclusive design – New build residential developments 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 expects all new build housing development to go above the minimum mandatory Building Regulations with a requirement to meet Building Regulations part M4 (2); and in this case for 10% of the units to meet part M4 (3) (wheelchair housing). This is applied to new build housing providing 10 or more units as required by policy DP6 of the Development Plan, emerging policy H6 and London Plan policy 3.8 (Housing Choice).
- 8.11 All of the residential accommodation has been designed in accordance with the above and to comply with the Lifetime Homes Standards. 10% of the market units are capable of being easily adapted for wheelchair accessibility. The assisted living units have been designed in accordance with the Camden Wheelchair Design Guide, providing not just accessible accommodation but also allowing for care and assistance from professionals in resident's homes. Signage indicating the entrances would be provided from the approach on Highgate Road and the entrances with colour contrast signage allowing visually impaired persons to locate them clearly. The details of the above would be secured via planning condition.
- Noise for prospective occupiers
- 8.12 The proposed residential development would be located above employment uses and surrounded by industrial uses including the J Murphy and Sons Limited Commercial Yard (Murphy's) to the south. Another source of noise and disturbance is the O2 Forum Kentish Town (The Forum), which as a music venue generates considerable noise from performances and attendees in the local streets, including the south end of Greenwood Place. In addition, a railway lies beyond the Murphy's site and the proposal fronts Highgate Road, which is a busy primary route that connects Kentish Town to Dartmouth Park and beyond to Highgate Hill. As mentioned throughout the report, residential development has been approved along the Highgate Road frontage under 2013/5947/P. Camden's Environmental Health Officers assessed both the previous and current proposal for noise impacts on prospective occupiers and found them to be acceptable subject to the submission of full details of a scheme for noise mitigation.
- 8.13 An 'Acoustics Planning Report' was submitted by Hilson Moran to support the current planning application. Based on the results of the environmental noise survey, the noise levels are within the parameters of Table B of policy DP28 as well as Table B of Appendix 2 (noise thresholds) of the emerging plan where the Council can normally consider attenuation. The report proposes acoustic laminated double-glazing along with enhanced sound insulation between the commercial and residential uses through wall and floor constructions.

- 8.14 At this stage, the exact locations and technical specification of the plant equipment are not known, and therefore it is not possible to predict the associated noise levels at the nearest noise sensitive properties. Despite this, it is considered that the plant design is sufficiently flexible to ensure that quiet, non-tonal plant can be procured and mitigation options can be included (e.g. plant enclosures/screening) to ensure the above noise limits are not exceeded (i.e. limited to at least 5/10dB below background levels). Following the final selection of plant items, a number of measures would be employed to ensure the external plant noise level limits are not exceeded. This includes low-noise plant; use of appropriate external acoustic linings around plant areas; atmospheric duct-mounted attenuators on air moving plant and a detailed acoustic mitigation assessment.
- 8.15 Following a thorough assessment of the proposal, the Council's Environment Officers support the proposal subject to the following details being secured via planning conditions:
- An enhanced sound insulation value $D_{nT,w}$ and $L'_{nT,w}$ of at least 5dB above the Building Regulations value, for the floor/ceiling/wall structures separating different types of rooms/uses in adjoining dwellings
 - Sound insulation of the floor/ceiling/walls separating the commercial parts of the premises from noise sensitive premises. The sound insulation value $D_{nT,w}$ and $L'_{nT,w}$ must be enhanced by at least 10dB above the Building Regulations value
 - Noise level in rooms shall meet the noise standard specified in BS8233:2014 for internal rooms and external amenity areas
 - Detailed design of mechanical plant, demonstrating at least 5dBA lower than the lowest existing background noise or 10dBA where the source is tonal
 - Servicing Management Plan (this would be within the S106)
 - Demolition Method Statement and Construction Management Plan (secured via S106)
- 8.16 In order to satisfy the above planning conditions the maximum noise levels from The Forum (in addition to all uses) will need to be taken into account in the design. The submitted noise report indicates that the background survey has been taken from a typical night at the venue. The measured noise readings during this night-time activity were compliant with policy DP28 (and Appendix 2 of the emerging plan) subject to an appropriate level of attenuation. A post-construction occupation testing condition for the building envelope is recommended to ensure that the final design adequately mitigates noise from the surrounding uses. Based on the above, it is considered that the proposal would result in an adequate quality of life for the prospective occupiers of the new residential units and that it would not prejudice existing and proposed commercial operations.

Conclusion

- 8.17 The proposed units have spacious proportions, good access to outside terraces or balconies, achieve recommended daylight levels, and are ideally located to take advantage of all the amenities and public transport facilities of Kentish Town Centre. There are a number of background noises that could lead to issues for prospective occupiers; however, subject to details of mitigation secured through the detailed design it is considered that the standard of living accommodation would be acceptable and within guidelines.

9. Affordable Housing

- 9.1 The borough seeks to maximise affordable housing provision with an on-site contribution towards affordable housing being sought in development schemes providing 10 or more units. Policy DP3 introduces a sliding scale for developments between 10 and 50 units. The 50% target operates on a sliding scale for housing developments, subject to financial viability, with a norm of 10% for 1,000m² of additional housing and 50% for 5,000m². Emerging policy H4 has a steeper scale between one or more additional homes to 25, starting at 2% for one home and increasing by 2% for each home added to capacity (the 50% target is reached at 25 homes). The proposal includes 60 additional residential units and 7,934m² (GEA) of floorspace meaning that a policy compliant provision would require 50% of the housing to be affordable. This would equate to 3,967m² on a floor area basis and 30 units on a per units basis. Paragraph 173 of the NPPF imposes an obligation on Councils to ensure viability when setting requirements for affordable housing. Therefore, any contribution would have to regard the viability of the development proposal.
- 9.2 The proposed development proposes 60 units of which 52 are for private sale and 8 for supported needs social rent which would be 13.3% based on proportion of units. The affordable component has a GEA of 824m², which at 10.4% by floorspace falls significantly below the 50% affordable housing target. Therefore, the proposal would fall well short of the requirements of policies DP3 and H4. However, this provision reflects the viability of the overall scheme.
- 9.3 The affordable housing provided is in the form of 8 x 1 bed assisted living units that have been designed in coordination with the Council's Adult Social Care service. They would be provided directly to Camden upon practical completion, at nil value, on a 125-year lease. The applicant will be responsible for the construction and fit out costs. The units would be fitted out and fully wheelchair accessible, with private amenity and dedicated access. Adaptions to the units would be designed towards the fit out stage, as each unit would be bespoke in accordance with the needs of the end user. The units of assisted living would be linked to the Greenwood CIL by providing accommodation for people who attend the centre. This is in accordance with the aims of the centre, which would provide services and shared facilities to support and enable people with disabilities to live as independently as possible as well as opportunities for social enterprise and access to work. Therefore, while the provision of affordable housing is well below policy expectations in terms of quantum, the units are bespoke and adaptive in nature, residents would be able to live near the CIL and the units would be constructed and transferred to the Council at nil cost. In addition to the affordable housing offered to the Council, the applicant would provide 95m² of community space in the form of a café. It would be operated

by the Council in association with the Greenwood CIL giving employment training for users of the centre. This space would be provided at practical completion to the Council at nil value on the basis of a 125-year lease. In light of the above requirements, the development cannot viably support more affordable housing.

- 9.4 Whilst the affordable housing secured under planning permission 2013/5947/P provided 8 affordable supported units as part of a 42-unit scheme, the affordable units to be provided within the current proposal are of higher cost and value. Under the previous approval, the emphasis was on single aspect flats with many of them fronting Highgate Road on the ground floor. The affordable units proposed in the current scheme are dual aspect apart from one unit, have defensible space, amenity space, are setback from Highgate Road and some of them have independent access and a dedicated pathway (Church Walk) in addition to the main pedestrian route through the site. The proposed affordable offer would provide a better quality of life for its prospective occupiers. As the quality of the affordable housing is superior this is considered to be of public benefit. Furthermore, the costs of implementing the affordable housing of the proposed development is significantly more, impacting on viability. Notwithstanding this, the below 50% provision of affordable housing would only be acceptable subject to scheme viability, which is assessed below.
- 9.5 It is noted that part of the justification for the approval of 2013/5947/P, which included a below provision affordable housing offer of 16.6% by floorspace, was due to the financial returns generated from the private unit sales of that development being able to fund the Greenwood Centre CIL. The proposed development would be subject to a Development Agreement (between the applicant and the Council) that would help directly fund the Greenwood CIL and ensure that it is successfully implemented. In addition to the funding of the Greenwood CIL, the Council uses its CIP funding amongst other things to provide additional units of affordable housing within the borough. Subject to the scheme being acceptable in policy terms by including the maximum provision that it can viably offer, the development would lead to other public benefits (i.e. the Greenwood CIL and other projects) in addition to affordable housing on other sites through CIP funding that would be gained from the Development Agreement.

Viability

- 9.6 The application is supported by 'Affordable Housing and Economic Viability Assessment' prepared by Allsop LLP. The report examines the development economics of the scheme and came to the conclusion that under current market conditions, the proposed scheme cannot viably meet the Council's policy compliant level of affordable housing nor can it afford to make any form of additional S106 payments.
- 9.7 Based on the market assumptions outlined and using the residual valuation method, the viability appraisal produced a negative land value of approximately -£4,571,000. The usual standard profit on cost requirement for a developer on a scheme with planning consent is approximately 20%. The applicant has assumed a zero land value because they already own their site (including the £10 million enabling land payment for the Council's site). Based on this assumption the appraisal generates a profit on cost of 9.8%. The benchmark land value, as

calculated by BPS who were instructed to review the viability report (see para 9.9), was calculated at £10.4 million. This is considered to be reflective of what the developer is paying for the site as they have assumed zero value for their land and would pay the Council £10 million for the Highgate Centre part of the site. In addition, it should be noted that the developer is transferring 8 affordable units and 'community' café at nil value to the Council.

9.8 The viability report claims that no ordinary developer would proceed with the development due to the deficit. The incentive that leads to an exception in this case is that the applicant currently owns, operates and runs the storage unit at the rear of the site. As part of the development, they would benefit from a substantially larger, modern and more efficient facility with the added benefit of excellent road frontage on Highgate Road, which acts as one of the main thoroughfares through Highgate and its retail area. A&A Self-Storage would not be able to undertake such a large expansion of their own business and gain road frontage without buying the land and proving the mixture of uses that the Council expects as outlined in the Site Allocations Document. Therefore, an alternative party would not be able to justify (financially) proceeding with the proposed development. Based on the fundamental lack of viability demonstrated within their report, in combination with the collective receipts for Camden outlined, Allsop conclude that it is clear that no additional affordable housing or financial compensation can be viably provided as part of the scheme.

9.9 BPS was instructed to undertake an independent review of the viability report by Allsop. A redacted copy of their review is included as Appendix 1. BPS acknowledged that whilst the 13% affordable housing delivery by unit falls short of the target of 50%, this housing would contribute nil value to the developer, as the affordable units would be commuted for nil consideration to the Council. This represents a considerably larger cost to the developer (in terms of income forgone) than typical affordable housing delivery wherein revenues are received from Registered Providers that purchase the units. BPS note that the -£4.57m deficit of the development as calculated by Allsop is mostly due to the substantial costs within the Development Agreement between the applicant and the Council, and the provision of the café and 8 assisted living units. The cost to the Council of £10 million for its part of the site would be second only to the cost of construction and is thus a significant burden on the scheme. It is noted that the submitted viability report calculated an estimated benchmark land value of £4.75 million for the Council's part of the site. BPS agreed with this valuation of the Council's land. Additionally, based on present day sales values, a sales revenue overage payment (based on any revenue achieved over £850psf on the private residential units) would be made to the Council of more than £1.9 million. This potential payment is considered by BPS to effectively be a form of land payment. They therefore argue that the total land payment would be £11.9 million, which would in addition to the 'payments in kind' in the form of the café and assisted living units at a peppercorn (i.e. at nil consideration). BPS also expect that the private units as part of the development will be as popular if not more so than Allsop's valuations. Therefore, the overage payment could exceed the applicant's estimate and stands as a significant cost to the scheme. BPS reviewed the cost and values that were applied by Allsop in the appraisal, and suggested that the proposed scheme's office values and its build costs should be amended. Despite this disagreement, BPS

acknowledge that even after these amendments the scheme cannot currently afford any additional affordable housing contributions. Officers therefore consider that the offer of 8 assisted living units maximises the amount of affordable housing that can be gained from the development.

- 9.10 BPS recommended that given the potential popularity of the scheme, that a post-construction review of viability could take place. A post-construction review would use actual costs and values to give a clearer idea of the scheme's ability to make further affordable housing contributions. Despite this BPS gave weight to the overage requirement within the Development Agreement that would deliver 50% of any uplift in revenues as further overage payments. This would substantially reduce the size of potential surpluses available for affordable housing contributions and BPS recognised that there is limited potential for any financial contributions to be gained from adopting a review. Moreover, the extent of the viability deficit means that there is a relatively small chance of a surplus arising.

Review mechanism

- 9.11 As stated in paragraph 4.4 of CPG2 (housing), the Council expects reappraisal of viability when a development is substantially completed. This is to capture an accurate estimate of the value of the development using current values and costs at the time of implementing the scheme rather than forecasted ones. A subsequent viability review determines the extent of any top-up payments that can be secured towards the shortfall in provision against the Council's affordable housing target.
- 9.12 Given that the proposal fails to meet policy required levels of affordable housing, planning permission would normally be subject to a review mechanism provided within the S106 agreement. This would protect the applicant's ability to clear the scheme deficit before any deferred contributions become payable and would potentially allow the Council to secure money towards affordable housing in the event of circumstances in terms of viability changing. The applicant has refused the addition of a head of term within the legal agreement requiring a further viability review. They stressed the unusual nature of the scheme, which has a delivery based upon a Development Agreement between the applicant and the Council. Their acquisition of land owned by the Council is subject to a payment, which would be invested in the Greenwood CIL and associated facilities for adult social care that are under development. The cost to the development has been included within the affordable housing appraisal and is one of the main reasons why the application can provide 8 affordable units and no more. In addition to the lump sum payment, the Development Agreement includes a review mechanism on the sales values with the Council receiving 50% of any increase in sales values. Should a review mechanism be included within the S106 agreement there would be two clawback provisions with potentially significant implications for the schemes deliverability. For these reasons, the applicant is not willing to agree to a review mechanism, as the scheme is already offering significantly more than it can viably afford and there is already an overage clause, which would result in further payments to the Council. The overage payments are based on the sale value of the units only (i.e. the scheme's profit and viability are not relevant to the overage payment, only the resulting sales values).

- 9.13 Officers note that the scheme is subject to a Development Agreement, which restricts the scheme's viability and it has been demonstrated that it would result in a significant deficit that a normal developer would not normally consider implementing. There is also already a form of review mechanism between the developer and the Council, which would result in the Council receiving 50% of any net sales receipt higher than £850psf for the private units. It is acknowledged that this is likely to have a significant return for the Council and is far more likely to result in payments than any post-construction viability review would. A post-construction review through S106 would only result in payments to the Council in the event of the scheme clearing any deficits, with the resulting profits split with the developer up until a cap (which would be approximately £8,328,950 based on the shortfall of affordable housing (3,967m²) x the payment in lieu multiplier (£2,650 per m²)). The overage payments through the Development Agreement are based on the sales values only, so would be made regardless of the scheme's profit, even if it fell further into deficit as a result of construction costs or other losses to the development. If sales prices are larger than expected payments would be made to the Council's CIP team. These payments would significantly reduce the chance for any potential surpluses to the scheme, making affordable housing contributions through any S106 review mechanism unlikely.
- 9.14 Any profits made by the Council from the overage payments would first contribute towards the Greenwood CIL as at present this development would have a net capital cost to the Council. Any overage after this point would be available to contribute towards funding the wider CIP programme that is delivering new affordable housing, schools and community facilities. This is in accordance with the approved scheme under 2013/5947/P, which proposed to use the financial returns generated by the market housing element of the development for the Greenwood CIL. Any surplus funds resulting from the overage payments would help pay for the centre, much like how the profits of the sales values from the extant permission intended to. The CIP Financial Advisor has given Officers comfort that any funds beyond this would be used in their wider programme (including affordable housing).
- 9.15 On balance, it is considered that there is a very limited prospect of any deferred contribution arising through a post-construction viability review and any such review mechanism would in this case be likely to frustrate development altogether. Given this and the requirements of the Development Agreement with the Council, it is considered that a review mechanism is not appropriate or necessary in this instance and Officers do not recommend that a clause be secured via S106.

10. Design, Conservation and Heritage

Context

- 10.1 The application site lies to the west of Highgate Road. To the south along Highgate Road is the listed Christ Apostolic Church and then The Forum. To the north along Highgate Road is Linton House, a sizable building of an industrial Edwardian character rising to seven generous storeys (with five storeys plus a lower ground floor up to a raised parapet and two storeys above). Adding to the varied context, a 20th century fire station sits opposite. To the north, period terrace houses begin to climb up towards Highgate. The site is not within a conservation area; however, the

southern end of Dartmouth Park Conservation Area does begin just in view further up Highgate Road.

- 10.2 The site is occupied by a two-storey (Highgate Centre) and three-storey (A&A Self-Storage) building. Both are 20th century infill buildings of low architectural merit. This site presents an opportunity to reunite this bit of townscape with a positive new infill development.
- 10.3 The consented Greenwood CIL is located on Greenwood Place, behind the proposed site. A key urban design objective for this site includes providing direct pedestrian access from Highgate Road to give it visible presence and to improve accessibility to the site.
- 10.4 Prior to the two storey Highgate Centre, the site was occupied by a Georgian terrace. This terrace was mirrored on the south side of the church on the site of the present Forum, providing a formal, balanced setting for the church. A key urban design objective is to reintroduce a balanced composition on either side of the church

Height, scale and massing

- 10.5 The application site is divided into two buildings to provide a new public route from Highgate Road through to Greenwood CIL as stated above. The proposed route and division of the overall built form is welcomed as it would help to break up this large block and provide a finer grain along the street.
- 10.6 The buildings have been designed to differentiate in scale and design to respond to the height and building lines of their neighbouring context. The proposed building to the north (Building 1) would rise to six storeys on the Highgate Road frontage with a seventh storey set back. The proposed height of this building would be comparable to the neighbouring Linton House and the industrial buildings around it. The smaller building to the south (Building 2) would be five storeys on the Highgate Road frontage with a sixth storey setback. This height and the building's footprint would be comparable with The Forum further to the south and would help to provide a balanced composition across the adjacent listed church. The proposed height and massing has been reduced through the design process in an attempt to address officers' concerns regarding the impact of this building on the streetscene. The resulting height would be similar to its neighbouring buildings and is therefore considered to fit in comfortably in the street scene and not appear overly large or dominant along the street. Figure 3 (below) shows the proposed buildings in context with the neighbouring structures.



Figure 3 (above): Context elevation showing how the proposed buildings would relate to the adjacent church and Linton House. Note: the blue line is the extant permission under 2013/5947/P, the pink line is the parapet of Linton House and the orange line the proposed buildings as part of this application.

New pedestrian route through

10.7 The need to provide a safe and accessible space through the site is important to the success of the scheme. The proposed route would provide an activated and animated area while also providing privacy and security for the assisted living ground floor units. Four ground floor flats would have direct access from the street through external front doors. Three other communal entrances provide access to the upper residential and commercial uses and a café would be situated on the corner of Highgate Road and the new path. As such, the proposal has a high level of interaction at ground floor level along the new route through the site. The residential units at ground floor would be buffered, with a landscape frontage to provide defensible space and visual interest. The quality of the hard and soft landscaping along this route will be important in its contribution to the overall public realm. The detailing of this would be conditioned subject to a successful application.

Design

10.8 The elevation of each building is articulated differently to respond to the neighbouring typologies. The varied design approach is considered to be an appropriate response to the varied architectural context and would help support local distinctiveness.

10.9 The detailed design of the block to the south (Building 2) has a strong presence, clear hierarchy and in responding to the curve of the street provides a positive relationship with the streetscape and the adjacent church. The southern flank wall would be lightly articulated to provide a muted backdrop to the listed church. This approach mirrors that of the Forum on the southern side of the church and helps to reintroduce a balanced composition on either side of the church.

10.10 The larger block to the north (Building 1) would have a warehouse type aesthetic with a strong rhythm of vertical piers to respond to the neighbouring buildings to the north. This is considered the right design approach for this building. The main elevations would be clad in a brick. Reconstituted stone and glazing would define the top storey. Brick is used extensively in the surrounding context and the proposed use of brick is considered an appropriate response to context that would support local distinctiveness. Overall, the proposed palette of materials is considered appropriate for the context and the windows within the proposal would have acceptable proportions and would be generally well articulated. Details and samples of the materials and detailed design elements (openings, reveals, balconies, shopfronts etc.) would be secured by planning condition to ensure superior quality.

Signage

10.11 The proposal for 'A&A' signage on the side elevations of Building 1 is considered acceptable in principle, subject to details. The signage would comprise of relief

brick and would appear traditional and appropriate to the building's warehouse typology and context. As currently shown on the proposed drawings, officers consider the signage to be overly large and dominant. Therefore, any approval would include a not withstanding condition requiring full details of the signage, including its size and zone.

Strategic viewing corridor

- 10.12 The strategic views in the London View Management Framework (LVMF) have been considered. Viewing Location 3A - Kenwood: the viewing gazebo, crosses the site although the height threshold is much higher than the proposed buildings. The maximum height of the proposal, to the small area of plant above Building 1, would be 63.450m above ordnance datum (AOD). This height is significantly lower than the thresholds of 90-95m for view 3A as set out in the LVMF. The application site is near Viewing Location 2A - Parliament Hill: the summit, which has a threshold of 85-90m. It can therefore be concluded that the development would not have an impact on the viewing corridor to St. Paul's from either of these locations. Figure 4 (below), shows the application site in relation to St. Paul's Cathedral from a panorama taken across London from the Kenwood House Gazebo. Due to the relative height of the proposals to the tree line in front of Kenwood House, the proposed buildings would not be seen in this view.



Figure 4 (above): Panorama from Kenwood House Gazebo (in Hampstead Heath)

Conservation and heritage

- 10.13 The primary heritage matters to consider relate to the setting of the grade II Forum music and entertainment venue as well as the grade II listed Christ Apostolic Church, both of which lie in close proximity to the site.

Impact on the setting of adjoining listed buildings

- 10.14 The relevant legislation and planning policy is summarised below:

- **The Planning (Listed building and Conservation Area) Act 1990:** In considering developments affecting a listed building or its setting, Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) requires that local authorities shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. The duties imposed by

section 66 of the Act are in addition to the duty imposed by section 38(6) of the Planning and Compulsory Purchase Act 2004, to determine the application in accordance with the development plan unless material considerations indicate otherwise.

- **The National Planning Policy Framework 2012:** The NPPF sets out the approach required in its chapter 12, Conserving and enhancing the historic environment. Paragraph 129 requires that Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal. Paragraphs 132-134 and 138 set out the approach to be taken to the consideration as to the impact of a proposed development on the significance of a designated heritage asset and assessment of the identification of any harm. Any harm to a designated heritage asset must be accorded considerable importance and weight in the overall balance.
- **Camden Development Plan 2010:** The proposal shall comply with the relevant Camden Local Development Framework Core Strategy policy which is CS14(a-c) 'Promoting high quality places and conserving our heritage'. The relevant Development Plan policies are DP25 'Conserving Camden's heritage' which provides more detailed guidance on the Council's approach to protecting and enriching the range of features that make up our built heritage. It states that the Council will not permit development that it considers would cause harm to the setting of a listed building.
- **Local Plan Submission Draft 2016:** Policy D2 'Heritage' requires the Council to preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including Conservation areas, listed buildings, archaeological remains and locally listed heritage assets.

Christ Apostolic Church

- 10.15 The church, as it appears today, dates from the mid-19th Century but may have origins of a former chapel, which stood on the site. The Church was built to house a larger congregation in response to the rapid urbanisation of Kentish Town. The original setting for the church was suburban, located between two terraces of substantial houses.
- 10.16 Over time the surrounding area become more industrialised. Consequently, the setting of the church became industrial and commercial. In the early 20th Century, Linton House was constructed on land formally occupied by houses. The Kentish Town Forum Theatre was completed in 1934 and replaced the terraces of houses immediately to the southeast of the church. The Highgate Centre (to the front of the application site) replaced the remaining adjoining terrace of houses after World War II (WWII).
- 10.17 The church has seen continual change to its setting. Most of this change has slowly eroded the original domestic arrangement of the church, which was setback from the road and flanked between groups of terraced houses and their rear gardens.

The Kentish Town Forum Theatre

- 10.18 The Forum was completed in 1934 to serve the rapidly growing population of Kentish Town. The area saw significant change during this time and by the mid-20th Century the large footprints and massing of the Victorian era industrial buildings and other large, standalone buildings were introduced.
- 10.19 The Forum's architectural language is one of a townscape building designed to respond to the classical style and regular rectangular form of the adjoining domestic houses but with architectural detailing of its period and double height columns highlighting its distinctive use and style.
- 10.20 The setting of the former theatre has continued to be architecturally varied with typical Victorian terraced houses grouped between larger warehouses and a cluster of 20th Century infill buildings such as the fire station opposite. The surrounding buildings vary in footprint, plot size, distance from pavement edge and height. This provides a diverse setting to the listed buildings.

Impact on the setting of the heritage assets by the proposal

- 10.21 The development of the area has resulted in continual change to the setting of both listed buildings. The original setting for the church was suburban. It was flanked by terraces of housing offering a more defined setting to the church at the road edge and toward the middle and rear. At present, The Forum provides a hard solid edge to the south of the church whilst the low-level warehouse of the existing site affords a more open aspect. The proposed development would offer a solid edge along its whole boundary providing a boundary more closely related to The Forum. This would help redefine and rationalise the flank boundaries of the site and offer a more harmonious relationship than what has existed since the existing site was developed.
- 10.22 The openings and fenestration pattern to the residential units on the southern boundary of the site does not allow for a completely solid or consistent flank elevation to the church in the same manner the flank of The Forum does. This is a symptom of the building's residential use, which requires openings and external areas for the prospective occupiers. Revisions have been received throughout the design development to ensure that this façade provides as neutral a backdrop as possible. The solid to void ratio, opening widths and solid treatment of the balustrades satisfactorily tones down the appearance of this elevation. The scale of the building immediately adjoining the church (Building 2) is one that would not over dominate by allowing the spires of the church to remain prominent.
- 10.23 The Forum frames the church to the south, providing a mass and scale reminiscent of the density of development that surrounded the church in the 19th Century. The new development adds to the development in the area with similar density and scale of development to The Forum (especially in terms of its depth and width of the built form). The proposed development would help to unify the townscape with a comparable scale of residential development that reflects the urban form and urban environment of the theatre. The Forum is architecturally distinctive with its own particular character and its setting is not considered to be harmed by the proposals.

10.24 In conclusion, for the reasons set out above, it is considered that the proposal would preserve the setting of the listed buildings and the features of special and historic interest that they possess. Therefore, no harm to the designated heritage assets would result.

Setting of the Dartmouth Park Conservation Area

10.25 The Dartmouth Park Conservation Area is 50m north along Highgate Road. Policy DP25 and emerging policy D2 provides for the protection of the setting of the conservation area. The proposal is not considered to harm the setting of the conservation area. Linton House, which is a large former warehouse, stands between the site and the southern end of the Dartmouth Park Conservation Area at a height of 7 storeys following a recent addition to its roof. Officers consider that the proposed development would not change the existing relationship and context for this area and the boundary of the conservation area.

Impact on non-designated heritage asset

10.26 Linton House is a non-designated heritage asset under Ref508 of the Local List 2015 for its architectural and townscape significance. The description notes that it is a massive red brick warehouse building dating to early 20th Century, and that it is part of a group of light industrial/warehouse buildings in the immediate location. Officers note that building's parapets have been raised and two additional storeys have been added to its roof since the listing. Given its scale, robust warehouse character and its location within a cluster of large warehouses already, it is considered that the proposal would not harm the setting of the non-designated heritage asset.

11. Basement

11.1 Policy DP27 states that developers will be required to demonstrate with methodologies appropriate to the site that schemes maintain the structural stability of the building and neighbouring properties; avoid adversely affecting drainage and runoff or causing other damage to the water environment; and avoid cumulative impact upon structural stability or water environment in the local area. Emerging policy A5 (Basements) similarly has these requirements and states that the siting, location, scale and design of basements must have minimal impact on, and be subordinate to, the host building and property. The policy includes a number of criteria for basement developments on smaller scale schemes. These include that basements should not be more than one storey, not exceed 50% of the garden and not be more than 1.5 times the footprint of the host building in area. The policy wording notes that exceptions to these criteria may be made on large comprehensively planned sites. Paragraph 6.128 clarifies that this applies to new major development, large schemes located in a commercial settings or developments over an entire or substantial part of an urban block. Given the proposed development includes the demolition of all the buildings on-site and its comprehensive redevelopment, this exception is considered to apply. A further requirement is that the basement should be set back from neighbouring property boundaries where it extends beyond the footprint of the host building. The basement would be largely within the footprint of the two proposed buildings, excluding the pedestrian pathway between them, and close to the boundary edges around the site. It is noted that the site is bound by public highway (Highgate Road

and Greenwood Place) on three sides. The remaining boundary is shared with the adjacent listed church, which benefits from a generous setback from the basement proposal. Subject to the impacts of the basement development on the natural and built environment being acceptable, which has been assessed below, the proposal is considered to comply with the above criteria within policy A5.

- 11.2 The existing buildings on-site are above ground with no subterranean development. They would be demolished as part of the proposal and a double storey basement would be created beneath the footprint of the site. The proposed basement would have a maximum depth of 7.9m below ground level with level -1 having a net internal area of 1,768m² with level -2 having 2,030m². It would include plant and storage space for the self-storage business (B8). The basement would lie adjacent to a grade II listed building, the Christ Apostolic Church, and the site contains underground development constraints (subterranean (groundwater) flow, surface water flow and flooding and slope stability).
- 11.3 A number of documents were submitted by the applicant in support of the basement proposal, including: a Ground Investigation Report by Ground Engineering, a Basement Impact Assessment (BIA) by Card Geotechnics Limited (CGL), Flood Risk Assessment (FRA) by Hilson Moran, a Civil & Structural Concept Report by Meinhardt Limited and various other documents and supporting information from CGL. The Council's independent auditor Campbell Reith has independently reviewed these documents. Campbell Reith undertook an initial review on February 2017 and a subsequent review on April 2017 following the submission of further information including details of the surface water flood risk within the FRA, clarification on ground investigation details, outline retaining wall designs and an outline monitoring strategy. The audit reviewed the BIA for potential impacts on land stability and local ground and surface water conditions arising from basement development in accordance with Camden's policies and technical procedures. Campbell Reith confirmed that a well-known firm of consultants who possess relevant qualifications and experience carried out the BIA.
- 11.4 The submitted BIA refers to the FRA and Environment Agency Data indicating that the site and surrounding streets are at medium risk of surface water flooding and at low risk from reservoir flooding. Suitable mitigation measures are proposed such as a manually operated flood barrier and groundwater drainage scheme. The proposed development is located within a Critical Drainage Area (Group 3_003) and appropriate attenuation has been presented within the sustainable urban drainage (SUDS) proposals. This would be secured via planning condition. Discussions with Thames Water have commenced and would be required as part of further drainage details.
- 11.5 Campbell Reith accept that there are no slope stability concerns. The ground conditions described in the BIA are accepted for the purposes of design and planning at this stage. Campbell Reith have recommended that further ground investigation would be required to inform detailed temporary and permanent works design and groundwater control measures within a Basement Construction Plan (BCP). A historic tributary of the River Fleet ran through the site and as such, alluvial deposits and groundwater are likely to be encountered. Suitable outline mitigation to potential hydrogeological impacts is presented within the BIA;

however, Campbell Reith requires this assessment to be confirmed following further investigation and monitoring within a BCP.

- 11.6 Assumptions have been made in the BIA on the outline retaining wall design, construction sequences and temporary support systems required to safely excavate and construct the 2-storey basement. Campbell Reith stated within their independent audit that following further investigation the temporary and permanent structural scheme should be confirmed within a BCP. The ground movement and building damage assessment within the BIA predicts damage no greater than Burland Category 1 (Very Slight) to neighbouring buildings. These assessments would need to be reconsidered within the BCP following further analysis of the site-specific ground conditions and details of the structural scheme. An outline monitoring strategy is also proposed for all structures and assets within the development's zone of influence. It would include appropriate trigger values and contingency action plans and form part of the BCP.
- 11.7 A groundwater drain is proposed to mitigate any rise in groundwater levels due to the construction of the basement. Campbell Reith are satisfied by this but require further investigation to confirm ground and groundwater conditions and an appropriate period of subsequent groundwater monitoring including waterproofing and flood risk protection measures through the BCP.
- 11.8 Based on the above and considering the initial BIA and revisions, Campbell Reith confirmed that they are satisfied with the basement proposal subject to a BCP being secured by S106 to include:
- Further site specific ground investigation to establish the ground and groundwater conditions
 - Further investigation and monitoring of an outline mitigation to potential hydrogeological impacts
 - The permanent and temporary structural scheme should be confirmed and presented
 - The ground movement and building damage assessments should be reconsidered following further investigations and development of the site specific ground conditions and structural scheme
 - Outline monitoring strategy for all structures and assets within the development's zone of influence, to include appropriate trigger values and contingency action plans
- 11.9 Subject to the securing of a BCP via Section 106 legal agreement, the development would accord with the objectives of Policy DP27 and CPG4.

12. Neighbouring Amenity

- 12.1 Adopted policies CS5, DP26 and DP28, emerging policies A1 and A4, and CPG6 (Amenity) seek to ensure that the existing residential amenities of neighbouring properties are protected, particularly with regard to visual privacy, outlook, daylight and sunlight, noise and air quality. Policies DP26 and A1 state that the Council will only grant permission for development that does not cause harm to amenity. The surrounding properties are labelled in figure 5 (below).



Figure 5 (above): Surrounding properties

- 12.2 The application site is immediately surrounded by Highgate Road to the front (northeast), Greenwood Place along the northern side and rear (southwest) boundaries and the Christ Apostolic Church shares the southern side boundary. The entrance and parking area to the J. Murphy & Sons Limited industrial estate lies to the south of the site behind the church along with the Greenwood CIL (currently under construction). To the east lies Deane House and the Highgate Business Centre buildings, which are predominantly in employment (B1) use.
- 12.3 Adjacent to the application site, on the opposite side of Greenwood Place to the northwest and fronting Highgate Road, lies Linton House which has recently been converted into 57 residential units on the upper floors and renamed as The Maple Building. Linton House has been the subject of a series of prior approval applications to convert the office (B1a) space on the 1st to 4th floors into 50 units under refs: 2014/4616/P, 2014/4618/P, 2014/4619/P and 2014/4620/P. A further 7 units have been constructed within a 5th and 6th floor extension under 2013/3494/P (as amended by 2015/1627/P and 2015/6513/P).
- 12.4 Further residential properties lie on the opposite side of Highgate Road including Elsfied House at 42 Highgate Road, which contains a 4-storey block of flats. There are flats located above a shop at 28a and 28b Highgate Road (between Elsfied House and the fire station). A pair of semi-detached properties are located at 44-46 Highgate Road on the corner with Burghley Road. Further to the above Burghley Road itself contains a street full of residential properties.

Daylight/sunlight

- 12.5 A Daylight and Sunlight report by Gordon Ingram Associates (GIA) dated 23/09/2016 (updated by an addendum document on 13/01/2017) has been submitted with the application. It provides an assessment of the potential impact of

the development on sunlight, daylight and overshadowing to neighbouring residential properties based on the approach set out in the Building Research Establishment's (BRE) 'Site Layout Planning for Daylight and Sunlight: A Good Practice Guide (2011)'. The extant permission 2013/5947/P is a material consideration for any impacts on daylight and sunlight. It includes a 7-storey building along the frontage of Highgate Road and now has an unlimited date for implementation as works to the permission have commenced.

12.6 The report makes use of four standards in the assessment of existing versus proposed daylight and sunlight levels:

- Vertical Sky Component (VSC) - A measure of the amount of sky visible at the centre of a window. The BRE considers that daylight may be adversely affected if, after development, the VSC is both less than 27% and less than 0.8 times (i.e. a reduction of more than 20%) its former value
- No Sky Line (NSL) - The area at desk level inside a room that will have a direct view of the sky. The NSL figure can be reduced by up to 20% before the daylight loss is noticeable
- Average Daylight Factor (ADF) - A measure of the ratio of the luminance in a room to the external unobstructed sky. It is mostly used to assess daylight in new dwellings but can be an additional test to VSC when the layout of the existing units are known
- Annual Probable Sunlight Hour (APSH) - A measure of the amount of sunlight that windows within 90 degrees of due south receive and a measure of the number of hours that direct sunlight reaches unobstructed ground across the whole year and also as a measure over the winter period

12.7 The daylight and sunlight report carried out an assessment on 42 (Elsfield House), 44, 46 and 28a and 28b Highgate Road as well as the newly constructed and partly occupied units within Linton House. It assessed 133 habitable rooms for VSC, 70 rooms for NSL and 70 rooms for APSH within surrounding residential properties. In addition, the existing and proposed ADFs for Linton House were calculated as the units are recently constructed and their layout is known. The report notes that the application site is underdeveloped in comparison with some of the surrounding buildings, as the Highgate Centre occupies around half the site with a 2-storey structure and an open car park and the A&A Self-Storage building is 2 storeys with a setback upper storey. The properties assessed currently receive very good levels of daylight and sunlight due to their open aspect onto the road and the existing low-rise nature and openness of the site. It is therefore likely that any meaningful development on-site would result in some impacts outside of the BRE guidelines. The assessment by GIA acknowledges the extant consent, which was deemed acceptable in daylight and sunlight terms, and that the current proposal contains similar massing but is slightly higher on Highgate Road with the inclusion of the A&A Self-Storage part of the site, which is less sensitive to the majority of the residential properties. Overall, the report concludes that while some of the surrounding residential buildings would see alterations to their daylight and sunlight

because of the proposed development, the retained daylight and sunlight in almost all cases can be considered good given the urban location of the site.

- 12.8 Linton House - This building, especially on the upper floors, currently receives light over the application site, which is much lower and open in comparison. This is an uncharacteristic situation given the location of the building and its surrounding context and results in very high existing daylight and sunlight values. The conversion from office to residential and the extension of the upper floors to provide flats were applied for and approved after the extant permission 2013/5947/P (for a 7-storey building opposite) was approved. The units within Linton House were therefore designed with the expectation that there would be a substantial building adjacent to it. An objection from Savills on behalf of the freeholder of Linton House was made on 21/12/2016. The contents were duly considered by Officers and forwarded to the daylight/sunlight consultant (GIA) who submitted an addendum to address the concerns raised. The addendum included ADF calculations to show that the resulting ADF levels would comply with BRE and British Standard recommendations. The further assessment was based on the implemented residential layouts at Linton House.
- 12.9 Of the 54 windows that have been assessed for VSC, mainly on the side elevation of the building facing the application site, 32 (59%) would achieve the BRE guidance. The quantum of change is significantly affected by the fact that Linton House is currently overlooking an underdeveloped site (i.e. an open car park and low-rise buildings) and enjoys relatively unobstructed views to the southeast. Therefore, any reasonable amount of massing on this site would lead to reductions in VSC. The 23 windows that do not achieve BRE guidance would see relatively high percentage reductions of between 20% and 60% VSC. Officers consider that it is undeniable that there would be a noticeable impact to the VSC of the side elevation facing the proposed development, which is unavoidable if a building of any meaningful mass is to be achieved on the site including the extant permission under 2013/5947/P, which could theoretically be built out.
- 12.10 The daylight distribution analysis under NSL judges the effect of the proposed building on the daylight within the room of the adjoining property rather than just one elevation. The habitable rooms on the upper floor of Linton House facing the proposal are set well back from the application site and are dual aspect, with a secondary window to either the front or rear, meaning that although light might be limited from the side elevation the daylight within the room would be less affected. The upper floor habitable rooms of Linton House nearest to the development are shown in figure 6 (below).

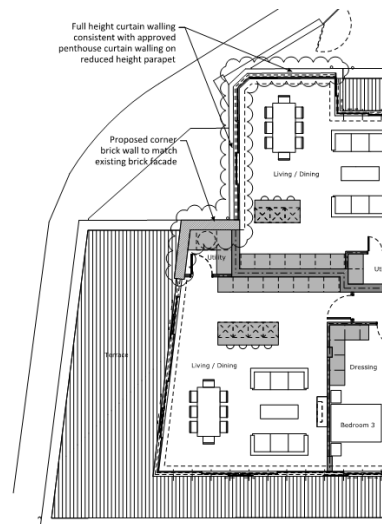


Figure 6 (above): Upper floor flat at Linton House adjacent to proposal

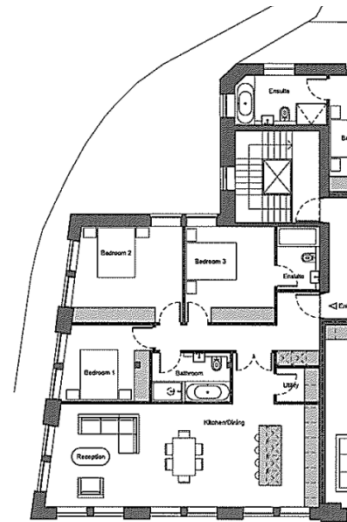


Figure 7 (above): Flat at floors 1-4 of Linton House adjacent to proposal

12.11 Floors 1-4 of Linton House have a similar layout as approved under the prior approval applications mentioned above (para 12.3). On the elevation near the proposed development the front units would all benefit from a large reception/kitchen/dining room with two windows facing the application site and six windows facing Highgate Road meaning the main habitable room would be well-lit and dual aspect. Two of the bedrooms would have aspects facing the rear, away from the site, with one of those units being dual aspect with three windows in total. The smallest bedroom within the units (bedrooms have the lowest priority for habitable rooms in terms of daylight) would have two windows facing the development. The other windows on the elevation facing the proposal serve cores or bathrooms. Figure 7 (above) shows the layout of the flats within floors 1-4 which face the application site. Based on the layout of the rooms, which are mostly dual aspect, GIA stated that when looking at the NSL assessment there would be no impact outside of the BRE guidelines to any habitable room within Linton House.

12.12 Given the consents for Linton House have now been fully implemented, GIA decided to look at the absolute daylight levels in the proposed residential units following the implementation of the proposed scheme by undertaking an Average Daylight Factor (ADF) analysis. The ADF provides an accurate indication of the daylight amenity within the room, to demonstrate whether the habitable spaces receive sufficient daylight for the specific room use. Bedrooms are considered to have the least importance for natural light and therefore require only 1% ADF, living rooms are required to achieve 1.5% and kitchens require the highest level of daylight at 2%. The ADF assessment is possible as accurate room dimensions and uses are available through the various permissions. Of the rooms that face the site, all would achieve the recommended British Standard for ADF. The existing and proposed measurements show that the rooms most affected are the bedrooms of the lowest floor (floor 1) facing the development. These rooms would still comfortably pass the minimum requirement (1%) for bedrooms with proposed values of 2% and 2.2%.

- 12.13 The daylight and sunlight report tested the 13 habitable rooms within Linton House that face within 90 degrees of due south as required by the BRE guidelines. This assessment demonstrates that all rooms will receive the BRE recommended 25% annual APSH. Three rooms would experience reductions in their winter APSH below the BRE recommended 5%. These rooms however, only see reductions between 3% and 4%, and given their use as bedrooms the BRE considers them to be less important than other habitable rooms when it comes to sunlight. Officers therefore consider the impact on the sunlight amenity to the building is acceptable.
- 12.14 While some impact to daylight would result to the southeast facing windows of the building, the technical analysis from GIA shows that there would be an almost negligible impact in terms of daylight received within the habitable rooms that face the proposal as they would pass NSL and ADF tests. The impact to the affected windows must also be considered against the fallback position of the extant permission under 2013/5947/P and the context of the existing site, which is relatively low in height, scale and density. The proposal is unlikely to be materially worse than what has been permitted, and can still be built, and the site circumstances should not prevent development of a height, orientation and massing that is appropriate for the area in townscape terms.
- 12.15 46 Highgate Road – This property is located to the north of the application site on the opposite side of Highgate Road. Nine windows were tested for VSC with none of them receiving an alteration outside of the BRE recommended levels, meaning occupiers would be unlikely to notice the change in light levels. Five windows were assessed for NSL with two breaches. One of the rooms would have a minor reduction of 26%, being just over the recommended 20%. The other room would have a more substantial reduction of 60%, which is due to it being at basement level below the street frontage (i.e. its ability to receive adequate daylight is limited by it relying on a lightwell). Where a room is predominantly below ground level the view of the sky is limited due to what is effectively a wall very close to the window. This reduces the view of the sky (on which both VSC and NSL are based) to a small pool at the front of the window. The location of Linton House (7 storey building opposite) means that this room currently enjoys a large portion of its light over the largely underdeveloped application site, with it lying diagonally across from the open car park. Therefore, any development on the application site would be likely to cause such an impact. The retained values are likely to be the same or higher than other rooms in similar situations within the properties further along Highgate Road.
- 12.16 Five rooms were assessed for APSH with all rooms exceeding the annual BRE recommendation of 25%. Only the basement room fails the winter APSH by 1%. On balance, Officers consider the minor shortfall acceptable given it relates to a basement room. The basement the unit benefits from a rear garden and amenity space within the lightwell. Due to only the front basement room experiencing reductions outside the BRE guidelines, with basement levels having a lower expectation of daylight and sunlight, it is considered that the impact on no. 46 would be acceptable. The current use of the basement room is unknown. Historic plans show it as a living room; however, it is the same size as the bedroom behind it and any occupier could feasibly use the unit as they wish. It is important to note that the main obstruction for this property and no. 44 is Linton House. The construction of

the scheme would result in reductions to daylight and sunlight levels; however, they would still be commensurate with the next-door properties at 58, 60 and 62 Highgate Road.

- 12.17 44 Highgate Road – The building is located on the junction with Burghley Road and is attached to no. 46. It is triple aspect (windows on 3 elevations) with amenity space to the front, side and rear with a lightwell that wraps around to a sunken garden. The upper level mansard benefits from dormers and rooflights. 24 windows were assessed for VSC with seven windows experiencing reductions of between 20-26%, which are considered minor transgressions over the BRE suggested 20%. Of the 12 rooms tested for NSL, only one room would receive a substantial reduction, being the basement room much like at 46 Highgate Road. The reduction would be 60% and while the use of the room is unknown, the basement flat benefits from another large habitable room with a rear facing aspect and a large external amenity space. All 12 rooms assessed for APSH exceed the minimum APSH levels for annual and winter sunlight and is therefore compliant on this front. Considering the level of the reductions, with the main room impacted in terms of daylight being a street facing basement room, the impact is considered to be acceptable.
- 12.18 Elsfield House (42 Highgate Road) – This property relates to a four storey residential housing block the freehold of which is owned by Camden Council. The 23 flats with 20 garages to the rear were granted planning permission in 1967 under F11/3/A/3808. The building contains parking at the lower ground floor level, single storey flats at upper ground and first floor levels and maisonettes over the second and third floors. Each unit benefits from a projecting balcony on Highgate Road, is dual aspect (front and rear) and has access to a large communal terrace behind the building. The front facing rooms overlook the open car park on the Hampstead Centre site and the two-storey structure, and therefore enjoy uncharacteristically high levels of daylight and sunlight in the existing situation. The ground and first floor windows are located beneath overhanging balconies that limits the view of the sky and causes a greater reliance on the light received from over the site. The planning approval under 2013/5947/P, which included a frontage building along Highgate Road, recognised that these flats are very vulnerable to losing much of their existing light due to the presence of balconies. Overhanging features create a greater reliance on light being received from low areas in the sky rather than from above where the greatest concentration of light is available. As part of that approval, the impact on daylight and sunlight was noticeable and beyond the guidelines; however, it was not considered unreasonable given the presence of the balconies. Issues of overshadowing were given less weight as preserving the current conditions of evening sunlight would virtually sterilise the development potential of this brownfield site.
- 12.19 The daylight and sunlight appraisal under 2013/5947/P stated that all of windows on the upper ground floor (with the exception of one window) and over two thirds of the windows on the first floor would have reductions of over 20% of their existing values, which means that these windows all failed to meet BRE guidelines. This was deemed acceptable by the light consultant and by officers given the rationale above.

12.20 40 windows were assessed for VSC with 18 (45%) achieving the BRE guidance. Of the 22 windows that would see alterations outside of the BRE guidelines, 21 would retain at least 15% VSC. A VSC value of 15% is considered a good level of retained daylight given the site's urban location (i.e. near a town centre), the undeveloped nature of the application site and the limitations of the projecting balconies at all but the uppermost levels. One window would retain slightly less than 15% VSC; however, it is located in a compromised position on the first floor, underneath a balcony and next to a significant return in the building that limits the view of the sky (see figure 8 below). These losses are similar to the extant permission as mentioned above. It is important to note that the top two floors of the building, which are not obstructed by balconies, all retain over 26% VSC and therefore it is clear that the balconies are the main source of impact on VSC for the floors below.



Figure 8 (left): The first floor window (highlighted in yellow) at 42 Highgate Road would retain less than 15% VSC; however, it is compromised by its position below a balcony and adjacent to a return. The rooms with a yellow highlighted window do not achieve winter APSH.

12.21 Although a large number of windows would fall under the BRE guidance, 75% of the rooms (27 out of 36) would achieve the BRE guidance for NSL. This means that while most of the windows would be affected in terms of VSL beyond BRE guidelines, the vast majority of the rooms would still achieve good daylight distribution. The rooms that do not meet the guidance would retain NSL to over 62% of the room area, which means that they would have sky views at desk height for the majority of the room. This is considered acceptable given the site context (i.e. opposite an underdeveloped site, which is being infilled). The BRE guidelines state that *'supplementary artificial lighting will be needed if a significant part of the working plane lies outside of the No Sky Line'*. Given the layout of most rooms, whereas the working plane will be closest to the window and the back of the room will usually be entrance/doorway/circulation space, it is considered that NSL to over 50% of the room will constitute a significant part of the room as within the working plane. 36 rooms were tested for APSH with 34 (95%) achieving the BRE guidance. The two rooms that do not meet the guidance are located behind a return of the building. These rooms receive almost all of their winter APSH across the application site, which currently has a building low in height and site coverage. The

affected rooms are the lower rooms shown in figure 8 (above), both rooms have one of the windows highlighted in yellow.

- 12.22 Following the request of officers, GIA provided a further addendum to their report on 30/05/2017 to create an alternative baseline assessment. The supplementary analysis created a 'mirror' of Linton House (which lies adjacent) on the application site and undertook an assessment on the impacts of the properties at 42 Highgate Road to compare against the proposed scheme. The results of the assessment show that the proposed development would cause less impact to no. 42 than Linton House would if it were implemented on the application site. Of the 40 windows tested for VSC, 33 would see no change or improvements over Linton House. The remaining windows had an increased impact of between 0.1%-0.5% VSC, which is negligible and would be unnoticeable by an occupant. 35 of the 36 rooms would see improvements, some significant, from the proposed scheme over the baseline position of Linton House. The remaining room would have a negligible impact. These results demonstrate that the impact caused by the proposal is less than it would be if the massing of Linton House were replicated on the site, which is not considered an unreasonable baseline position as it would continue the building line along the western side of Highgate Road. Therefore, the retained levels of light for occupiers within no. 42 are commensurate given the surroundings and urban location of the property.
- 12.23 In conclusion, the flats within the property would undoubtedly notice the alteration to existing levels of daylight and sunlight. GIA consider that the level of amenity remaining would be acceptable in terms of the technical calculations of the report given the urban location of the building. Officers note that these units are all dual aspect with private amenity space, communal amenity space and they currently benefit for uncharacteristically high levels of light given the nature of the application site. In this context and due to the extant permission, which would have a similar impact, the proposal is considered acceptable on balance.
- 12.24 28a and 28b Highgate Road – The submitted assessment concludes that the upper floor residential units would receive no alteration to their existing VSC, NSL and APSH levels.

Outlook

- 12.25 The existing site contains buildings of two and three storeys that do not cover the entire frontage of the property. The proposed development includes two new buildings of seven and eight storeys, which extend across the majority of the Highgate Road frontage and the full depth of the site where it meets Greenwood Place. Due to the open and underdeveloped nature of the site, any reasonable development would have some impact on outlook of neighbouring occupiers in that they will enjoy less of an open view than they currently have. The extant permission under 2013/5947/P included a part five part seven storey building along the Highgate Road frontage. This development did not include the development of the A&A Self-Storage site to the rear.
- 12.26 The building at Elsfeld House (42 Highgate Road) is located more than 24m on the opposite side of Highgate Road. Given the setback of the building, across a main arterial route, it is not considered that those occupiers would be materially impacted

by way of a loss of outlook or overbearing impact. The other residential buildings on the opposite side of Highgate Road (no.s 28a, 28b, 44 and 46) would have similar setbacks.

12.27 Linton House (aka The Maple Building) has been converted into residential units on floors 1-6 and has windows, which would face Building 1, on its southeast elevation. The Linton House building has a generous parapet that is approximately half a storey lower than the parapet of Building 1. Linton House benefits from two additional storeys with the recently constructed winter gardens being of a greater height than the proposal. Given that the proposed building would have a similar setback from Greenwood Place as Linton House, with its parapet height not significantly larger and the maximum height being slightly less, it is not considered that the resulting development is an unreasonable neighbour.

12.28 Floors 1-4 of Linton House have three habitable rooms (2 x bedrooms and a living/dining/kitchen room) with aspects on the southeast elevation of each floor. This layout is shown in figure 7 above. The rooms within these units have a setback of 9-9.8m from Building 1; however, the units are triple aspect with outlooks to the front and rear in addition to the side towards the proposal. The main habitable (living/dining/kitchen) room for these units have six windows facing Highgate Road in addition to the secondary windows towards the development. The applicable units also benefit from two rear-facing bedrooms, including a dual aspect bedroom with an outlook towards Building 1, with windows that do not face the development. The other bedroom within these units have a single aspect bedroom looking towards Building 1. These rooms would experience a loss of outlook given that a new building would be constructed around 9m away. On balance, Officers consider this impact to be acceptable for the following reasons:

- the affected single aspect rooms are bedrooms (which have less importance than main habitable rooms);
- the bedrooms are within triple aspect units (with outlooks to the front and rear);
- the fallback position of the extant permission 2013/5947/P (which is 7 storeys opposite the bedrooms) is a material consideration and;
- the affected bedrooms would look out over Greenwood Place onto a building of a similar height and setback as Linton House, meaning that it would still have a reasonable outlook considering its urban context.

12.29 The rooms within the fifth floor of Linton House benefit from a much greater setback from Building 1. The units that would face Building 1 are dual aspect, have large terraces at fifth floor level and winter gardens on the sixth floor with wide and multidirectional views. Overall, while the existing units within floors 1-6 of Linton House would experience some loss of outlook over the existing situation, it is not considered an unreasonable level. This is due to the current underdeveloped nature of the application site and given that the affected units are dual aspect with the main habitable rooms benefitting from their primary outlooks across Highgate Road. The extant permission under 2013/5947/P is also relevant as the fallback position includes a 7 storey building opposite Linton House. As there would be a realistic prospect of this permission coming forward in the event of the proposed development failing, it is considered to be a material consideration. The built form

of the extant permission is similar depth and height of Linton House so would result in a similar loss of outlook to the affected side facing windows in terms of them directly facing a new built form.

Overlooking/loss of privacy

12.30 Given the setback of the proposed buildings from the residential occupiers on the opposite side of Highgate Road, it is not considered that the proposal would result in a material level of overlooking or loss of privacy for those properties.

12.31 Building 1 includes residential units on floors 4-7. The units on floors 4-6 would have windows on the side elevation facing Linton House with a setback of between 9-9.8m. Although these windows would face each other over Greenwood Place, at different heights and alignments, a potential for mutual overlooking exists. To prevent potential instances of mutual overlooking, a number of the proposed windows on Building 1 would be obscurely glazed and non-openable to a height of 1.7m. Details of the proposed obscure glazing have been submitted (see figure 9 below) and would be secured by planning condition. Building 1 includes a roof terrace on the 6th floor and residential units on the 7th. The balustrade for the terrace is setback behind a landscaped buffer zone with the habitable windows of the rooms set further behind the balustrade. Given the height differences and setbacks between the upper floor terrace and windows of Building 1 and the upper floors of Linton House, material levels of mutual overlooking are unlikely to result. Furthermore, the terraces and units for both buildings are dual aspect with the outlooks towards each other being secondary.



Figure 9 (left): Level of translucent glass on the side elevation of Building 1 which faces Linton House. Windows on the upper floors that are opposite habitable rooms would be obscured and fixed shut below 1.7m.

Noise and general disturbance

12.32 The proposed development includes a 'community' café on the ground floor of Building 2 fronting Highgate Road. Café uses have the potential to cause noise and disturbance to residents depending on the nature of the operation. As the use would be run in association with the Greenwood CIL, officers consider that detrimental impacts to surrounding occupiers would be unlikely. A condition would be attached to any planning permission restricting the operation of the 'community' café to be run as part of the Greenwood CIL. Noise from the comings and goings of customers would be readily addressed by an hours of use condition to prevent customers from being on the premises outside of the 08:00-23:30 timeframe which

is in line with new A3 uses typically approved on main road locations near town centres such as this. Details of the flue extraction and other such external equipment would be secured through planning conditions.

- 12.33 The proposal would include the retention and expansion of the existing self-storage (B8) use on-site. Officers consider that the use is unlikely to result in a significant level of harm to the living conditions of adjoining occupiers, as the activity is limited to customers delivering and collecting their storage. Furthermore, the resulting use would be less harmful in terms of its current impact, as the use would be largely subterranean and within a significantly upgraded building with higher quality fabric and insulation. As per para 7.11, the use of the self-storage space would be restricted via planning condition to prevent it from being used for other activities within the B8 use class.
- 12.34 The activity generated by the proposed office and residential uses would not result in an unacceptably detrimental impact on neighbouring amenity given the site's urban location and the nature of the existing and surrounding buildings. Building 1 includes a second floor level amenity terrace for office use. A condition would be attached to restrict the use of the terrace for employment uses (B1) only and between 08:00 and 21:00 Monday-Friday.
- 12.35 As discussed in paras 8.13 and 8.14, an Acoustics Report has been submitted in support of the planning application. The report measures the background noise levels for the surrounding area and includes details of how the proposed plant equipment would be designed to minimise noise impacts. The Council's Environmental Health Officers have reviewed the details and suggested a number of conditions, including the detailed design of plant equipment, secured noise levels and any-vibration measures.

13. Transport and Access

- 13.1 The site is easily accessible by public transport with a public transport accessibility level (PTAL) rating of 6a (excellent). Bus stops are located nearby on Highgate Road, Fortess Road and Kentish Town Road. A northbound bus stop is located directly adjacent to the Highgate Road frontage. The nearest rail station is Kentish Town to the south of the site. This station is served by the London Underground Northern Line and First Capital Connect services. Kentish Town West station is located to the southwest of the site and is served by London Overground services.

Trip Generation

- 13.2 Trip generation analysis of the existing site versus the proposed development was undertaken by the applicant to determine the net impact of the proposal. The analysis predicts an additional 65 two-way trips in the morning peak and an additional 63 two-way trips in the evening peak hours. The analysis goes on to predict an increase of 22 and 21 underground trips in the morning and evening hours respectively. Additionally, it predicts an increase of 12 bus trips in the morning and evening peak hours. These additional trips would be associated with the new office and residential units and would have a negligible impact on the transport network in the local area.

- 13.3 The self-storage unit (A&A Self-Storage, existing use being expanded) is predicted to generate approximately two vehicular trips during each peak hour. Officers consider that this would have a negligible impact on the transport network in the local area.
- 13.4 Trip generation analysis by the applicant predicted the following modal split for additional trips associated with the development:
- Public transport (61%)
 - Cycling (13%)
 - Walking (13%)
 - Motor vehicles (12%)
 - Other (1%)

In reality, Transport Officers consider the modal share for motor vehicle trips is likely to be lower than the predicted figure due to the car-free nature of the proposed development.

- 13.5 The development would be car-free (secured via S106), resulting in the vast majority of trips taking place by sustainable modes of transport (i.e. walking, cycling and public transport). This would be supported by the provision of 139 secure cycle parking spaces. These measures along with travel plans for the commercial and residential uses would help to encourage trips by sustainable modes of transport rather than by private motor vehicle.

Car parking

- 13.6 The site is located within the East Kentish Town Controlled Parking Zone (CPZ) CA-M, which operates on Monday to Friday between 0830 and 1830 hours. There are no parking bays on Highgate Road in the immediate vicinity of the site. A number of parking bays exist on Greenwood Place:
- 7 resident parking bays (4 adjacent to the Greenwood Centre and 3 adjacent to the Highgate Business Centre).
 - 7 pay to park bays (5 adjacent to the Forum and 2 adjacent to Linton House).
 - 2 disabled parking bays and a motorcycle parking bay adjacent to the Greenwood Centre.
- 13.7 The submitted plans show works to Greenwood Place and the Greenwood Centre; however, they are labelled as indicative and are outside the redline boundary of the application site and the applicant's ownership. These amendments do not form part of the planning application and would need to undertake a separate public consultation exercise via the Highways Act by the Council's Transport Design Team. They would need to be supported by officers in Parking or Transport Strategy and the local community. Any proposal to remove on-street parking would involve advertisement of the proposed amendments to existing traffic management orders.
- 13.8 The existing site has space for at least 20 motor vehicles to be accommodated within the site boundary. The proposal would retain 10 spaces for the reconfigured

storage facilities (B8). This is acceptable and the reduction of on-site provision is welcomed. The spaces would be for customers of the facility. This would comply with emerging policy T2, which states that car parking for operational or servicing needs is acceptable for new developments (part a. ii). Such spaces are necessary for the operation of the self-storage facility as customers need to park when dropping off and collecting their items. They would be for the sole use of customers and a parking management plan would be secured by S106.

- 13.9 The proposal would otherwise be a car-free development in order to be compliant with Core Strategy policy CS11, Development Plan policies DP18 and DP19, and emerging Local Plan policy T2. On-site parking spaces would not be provided and residents/staff of all the uses would not be able to obtain on-street parking permits from the Council. A car-free development would be secured via a covenant under s.16 of the Greater London Council (General Powers) Act 1974 and other local authority powers if planning permission is granted.
- 13.10 The proposal includes eight wheelchair accessible residential dwellings that would be handed over to the Council as part of a S106 Agreement. The Council's parking standards generally require such dwellings to be provided with a dedicated accessible parking bay within the site boundary. The proposal does not include any provision for disabled parking spaces within the site. Although this may have been useful, it is worth noting that the site is easily accessible by public transport. It should not be assumed that any disabled residents, staff or visitors would have an essential need for a private motor vehicle or a dedicated parking space. In addition, residents, staff and visitors with a recognised disability and in possession of a blue badge would be able to park on the public highway in the general vicinity of the site, in the same way as residents in possession of a residents parking permit. The applicant has stated that the level of care required for the residents of these supported dwellings means that they would not own their own cars. Officers in the Council's Regeneration team have confirmed this. The proposal is considered acceptable on this basis and is similar to what was agreed under 2013/5947/P.

Cycle Parking

- 13.11 DP18 requires developments to sufficiently provide for the needs of cyclists. Emerging policy T1 promotes accessible, secure cycle parking facilities as well as the provision of facilities including changing rooms, showers and lockers. The London Plan provides guidance on minimum cycle parking standards and these are outlined in Table 6.3 of the London Plan. To meet the requirements of the London Plan, the following would need to be provided:
- 'Community' café (A3) = 0 spaces as below the threshold of 100m²
 - Office (B1) = 20 Long Stay, 4 Short Stay
 - Self-storage (B8) = 9 Long Stay, 4 Short Stay
 - Residential (C3) = 96 Long Stay, 2 Short Stay
 - Overall = 125 Long Stay, 10 Short Stay
- 13.12 The proposal includes 177 spaces overall, including 12 visitor/short stay Sheffield stands. The overall quantum comfortably exceeds the London Plan minimum standards in line with policy T1. Although 12 Sheffield stands are proposed on the

exterior of the buildings for visitors, officers consider that they could accommodate 15 cycles as there is space either side of 3 of the stands. The proposed cycle parking spaces would benefit from step free access being at street level, on the ground floor or accessible via lifts.

- 13.13 121 spaces would be provided for the residential uses, including 64 within three separate bicycle stores on the first floor of Buildings 1 and 2, while the 52 market units would benefit from their own internal storage cupboards (57 in total). The provision of cycle parking within the individual units and communal storage facilities offers prospective occupiers a choice of where to store their cycle(s) and ensures the cycle parking is convenient and secure. Visitors would be able to use the short stay cycle parking facilities within the hard landscaped areas.
- 13.14 Internal cycle storage is not proposed for the 'community' café, which is acceptable given its size (less than the 100m² threshold within the London Plan). Staff and visitors would be able to use the short stay cycle parking facilities provided externally within the hard landscaped areas. Additionally, they would potentially be able to use spaces dedicated to the commercial spaces on-site or the Greenwood CIL to the rear.
- 13.15 26 internal spaces are proposed for the office use within the first floor of Building 1. Visitors would be able to use the spaces provided externally as mentioned above. Changing rooms, showers and lockers for staff are provided on the second and third floors.
- 13.16 The applicant initially failed to provide spaces for the self-storage use with their justification being that it only employs 1-2 staff members and visitors typically do not arrive by cycle given they deliver and collect their goods from storage (i.e. they are most likely to arrive by motor vehicle). Following negotiations with officers, the applicant is providing 18 spaces within the ground floor car park and reception area of the self-storage part of the development. This provision is welcomed and would be available for staff and visitors as required.
- 13.17 Overall, the provision of cycle parking is considered acceptable. The 177 spaces and details of the specific types of facilities would be secured by condition if planning permission is granted. The details would need to be designed in accordance with CPG7 (Transport).

Deliveries and servicing

- 13.18 Deliveries and servicing for the site would take place in the following ways:
- From the single yellow line on Highgate Road at times when loading and unloading is permitted
 - From single yellow lines and pay to park bays on Greenwood Place
 - From the dedicated loading bay to be located within the site boundary adjacent to the northern section of Greenwood Place
- 13.19 The proposal is likely to lead to a slight increase in trips associated with deliveries and servicing activity (e.g. deliveries to the café, offices and residential dwellings). These additional trips would have a negligible impact on the transport network in the local area so long as they are managed in a coordinated manner.

13.20 The Council needs to ensure that the impacts of deliveries and servicing activity are minimised (e.g. access, traffic congestion, road safety, amenity issues). A delivery and servicing management plan (SMP) would be secured via S106 if planning permission is granted. This would help ensure that deliveries and servicing activity would have a negligible impact on the transport network in the local area.

Travel planning

13.21 Framework Travel Plans have been submitted in support of the planning application for the commercial and residential uses. This is welcomed as travel plans would help encourage and promote trips by sustainable modes of transport (i.e. walking, cycling and public transport) as an alternative to private motor vehicles. More detailed Travel Plans and associated monitoring contributions of £3,122 for each travel plan would be secured via S106 if planning permission is granted.

Highways works

13.22 The summary page of Development Policy DP21 states that 'The Council will expect works affecting Highways to repair any construction damage to transport infrastructure or landscaping and reinstate all affected transport network links and road and footway surfaces following development'. The Council will undertake highway works connected to a development proposal at the developer's expense in accordance with paragraph 6.11 of the emerging Local Plan.

13.23 The proposal would most probably lead to significant levels of damage to the public highway in the general vicinity of the site on Greenwood Place and Highgate Road. The Council would need to repair any such damage. The application suggests that all construction vehicles would access the site directly from Greenwood Place; however, Transport Officers consider that there may be benefits in providing a temporary access directly from Highgate Road. This would minimise the impact of construction on other occupiers of Greenwood Place. This can be considered during the preparation of a pre-commencement construction management plan, subject to approval of planning permission.

13.24 The extant permission under 2013/5947/P included a number of proposed improvements to the layout of Greenwood Place to facilitate the Greenwood CIL. These improvements include the creation of a raised table across the entrance of the centre to Greenwood Place to the south; improvements to the existing raised table across Greenwood Place to the north; widening and resurfacing of the footways; dropped kerbs and tactile paving at the vehicle access to Highgate Business Centre and Deane House and new turning heads. An option to prohibit motor vehicles from using the section of Greenwood Place between the site and The Forum (adjacent to the church) is being investigated. These works are indicative and require the Council to undertake a separate public consultation exercise via the Highways Act. The above highway improvements are subject to detailed design and consultation with Camden's Transport Team and are mostly being funded through the financial contributions received under 2013/5947/P, which created the need for the improvement works through the introduction of the Greenwood CIL.

- 13.25 The highway works described above relate to land within the public highway and would be designed and constructed by Camden. A highways contribution (estimate to be confirmed by the Council's Engineering Service) for any repair, repaving and tying in works created by the development would be secured via a S106 planning obligation if planning permission is granted.

Pedestrian, Cycling and Environmental Improvements

- 13.26 New developments of a large scale can have wider impacts and may increase the demands on a transport network that at certain times already operate above capacity. Paragraphs 10.10-10.13 of CPG8 (Obligations) state that the Council may seek contributions to enhance the existing provision of public transport services and fund area-based network improvements. Given the scale of the proposed development, a contribution towards pedestrian, cycle, and environmental improvements could be negotiated subject to its wider impacts being demonstrated and a specific project requiring funding being found.
- 13.27 The extant permission under 2013/5947/P was required to pay a sum of £50,000 towards pedestrian and cycle improvements at the Kentish Town Road/Highgate Road/Fortess Road junction, which is located approximately 100m from the application site. These improvements include widening the footway on the eastern side, removing the staggered central islands and altering the signal settings so that pedestrians can cross all arms of the junction at the same time. Adult Social Care clients specifically requested improvements to this junction as part of the Greenwood CIL project. Any contribution as part of the current scheme would need to meet the requirements of regulation 122 of the CIL Regulations. The Council would need to demonstrate whether an improvement is necessitated by the development. Negotiations with officers and the applicant are continuing on this matter.

Internal public realm works – new route through

- 13.28 The proposal would deliver an improved public realm within the site. This would include a new pedestrian route through the site, which would provide a valuable connection between Highgate Road and the Greenwood CIL on the western section of Greenwood Place. It would also provide an area for occupiers of the development to access the cores of the building, located off the new route. The public realm proposals are welcomed as they would provide a pleasant environment for pedestrians. The public realm proposals are shown on the landscaping plan. Details including hard and soft landscaping material specifications would be secured by condition if planning permission is granted.

Basement excavations adjacent to public highway

- 13.29 The proposal would involve basement excavations directly adjacent to the public highway. The Council has to ensure that the proposed basement excavations do not compromise the stability of the public highway adjacent to the site.
- 13.30 The applicant would be required to submit an 'Approval in Principle' (AIP) report to the Council's Highways Structures and Bridges Team within Engineering Services as a pre-commencement S106 obligation. This is a requirement of British Standard BD2/12. The AIP would need to include structural details and calculations to demonstrate that the proposed development would not affect the stability of the

public highway adjacent to the site. In addition to these details, an explanation of any mitigation measures would be required.

- 13.31 The AIP and an associated assessment fee of £5,400 would need to be secured via S106.

Construction management

- 13.32 Development Policy DP20 and emerging policy A1 state that Construction Management Plans (CMP) should be secured to demonstrate how developments would minimise impacts from the movement of goods and materials during the construction process (including any demolition works). Policies DP21 and A1 relate to how a development is connected to the highway network. For some developments, this may require control over how the development is implemented (including demolition and construction) through a CMP. A draft CMP has been submitted in support of the planning application. This provides some useful information and follows the Council's approved format; however, it lacks detail as a principal contractor has yet to be appointed.
- 13.33 Various schools are located nearby (including Eleanor Palmer Primary, Acland Burghley, Kentish Town Church of England Primary, St Patrick's Primary, William Ellis and Parliament Hill) and this part of the borough suffers from severe traffic congestion during peak periods. The Council's primary concern is public safety and the need to ensure that construction traffic does not create (or add to existing) traffic congestion in the local area. The proposal is likely to lead to a variety of amenity issues for local people (e.g. noise, vibration, air quality, temporary loss of parking, etc.). 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 be secured via S106.
- 13.34 In order to minimise traffic congestion and road safety issues during development works, construction vehicle movements would need to be scheduled to take place between 0930 and 1500 hours on weekdays and between 0800 and 1300 hours on Saturday during school term time. During school holidays, construction vehicle movements could be scheduled to take place between 0930 and 1630 hours during weekdays and between 0800 and 1300 hours on Saturday. Specific details would need to be agreed with Camden during development of the CMP. The CMP would need to be approved by Camden prior to any works commencing on site. The development would also need to be registered with the Considerate Constructors' Scheme.
- 13.35 Pre-commencement consultation on the proposed construction arrangements would need to take place with the local community and a construction-working group would need to be formed prior to a CMP being approved by the Council. The Council has a CMP pro-forma that must be used when planning permission is granted and once a Principal Contractor has been appointed. The development, if approved, would require significant input from officers. This would relate to the development and assessment of the CMP as well as ongoing monitoring and enforcement of the CMP during demolition and construction. A CMP

Implementation Support Contribution of £17,500 would need to be secured via a S106 planning obligation.

Summary of requirements

13.36 The proposal would be acceptable in terms of transport implications subject to various conditions and S106 planning obligations being secured:

- Condition to secure the provision and ongoing maintenance of 177 secure cycle parking spaces
- Condition to secure hard and soft landscaping details (e.g. material palette specifications and cycle parking location details for the internal courtyard and pedestrian route)
- S106 to secure the new pedestrian route through the site to be recognised as a public right of way in perpetuity
- S106 – Car-free development
- S106 - Servicing management plan
- S106 - Landscaping management plan
- S106 - Parking management plan
- S106 - Construction management plan (CMP)
- S106 - CMP Implementation Support Contribution of £17,500
- S106 - Travel plan and associated monitoring fee of £6,244
- S106 - Approval in principle report and associated assessment fee of £5,400
- S106 - Highways contribution (estimate to be made) and levels plans

14. Nature Conservation and Biodiversity

14.1 An 'Ecology Appraisal' by Hilson Moran was submitted as part of the application to establish the ecological value of the site and its potential to support notable and/or legally protected species. The report includes recommendations for enhancing the ecological value of the site. Enhancement opportunities within the proposed development include the provision of street-level landscaping, a landscaped terrace on the second floor of Building 1, an extensive green roof on Building 1 and a biodiverse green roof on Building 2. Species included within the planting would focus on native species of local provenance. In addition to the landscaping, artificial faunal habitat aids have been recommended to improve the biodiversity value of the site, and the local area, for birds, bats and invertebrates. These include bird and bat boxes, sparrow terraces, invertebrate features such as log/rubble piles, water features for birds such as bird baths, bird feeders and insect nests. The long-term management of the landscaped habitats and artificial habitat aids is recommended through a Landscape and Ecological Management Plan. The plan would ensure the biodiversity enhancements are incorporated and maintained for a minimum of five years post-construction. This would be secured via S106.

14.2 The Council's Nature Conservation Officer has reviewed the Ecology Appraisal and considers it to be a comprehensive document and is satisfied with its conclusions that there are no ecological constraints to development. The site is within the vicinity of the Northern Line strategic wildlife corridor and Site of Importance for nature conservation, so biodiversity enhancements should seek to complement this and would be secured via planning condition/S106.

15. Sustainable Design and Construction

- 15.1 Policy DP22 (Promoting sustainable design and construction) states that the Council will require development to incorporate sustainable design and construction measures. All developments are expected to reduce their carbon dioxide emissions by following the steps in the energy hierarchy (be lean, be clean and be green) to reduce energy consumption. Emerging policy CC1 states that the Council aims to tackle the causes of climate change in the borough by ensuring developments use less energy and assess the feasibility of decentralised energy and renewable energy technologies. Policy CC2 of the emerging Local Plan requires development to be resilient to climate change through increasing permeable surfaces and using Sustainable Drainage Systems, incorporating bio-diverse roofs/green and blue roofs/green walls where appropriate and including measures to reduce the impact of urban and dwelling overheating.
- 15.2 To comply with the London Plan the proposal must secure a minimum 35% reduction in regulated CO₂ emissions below the maximum threshold allowed under Part L of the Building Regulations 2013. Where the London Plan carbon reduction target cannot be met on-site, the Council may accept the provision of measures elsewhere in the borough or a financial contribution (charged at £90/tonne CO₂/year over a 30-year period) to secure the delivery of carbon reduction measures elsewhere in the borough.
- 15.3 The proposals for the site are for a mixed-use development with residential units, offices and self-storage units. All viable measures within the 'be Lean, be clean and be green' sections of the energy hierarchy have been maximised for the development. The proposed development would achieve an overall carbon reduction of 16.68% beyond Part L. While the overall regulated CO₂ emission reduction is only 16.68%, the residential component of the scheme taken in isolation achieves a performance of 38% which exceeds the 35% threshold. The non-residential component of the scheme consists of offices and self-storage units, which taken in isolation only achieve a performance of 3.65%. The self-storage units consist of two levels of basement for storage and a small reception and office area on the ground floor. Consequently, the self-storage component of the scheme has a limited heating demand. High efficiency variable refrigerant flow (VRF) units meet the cooling demand associated with the office and reception areas. The Combined Heat and Power (CHP) would provide all of the domestic hot water demand for the wider development. The warehouse would benefit from efficient lighting and photocell control dimming is proposed for the associated office areas. The warehouse component of the scheme presents no further opportunities to demonstrate a carbon reduction and therefore, it is not considered feasible to further improve the carbon performance of the non-residential component of the scheme.
- 15.4 As the carbon reduction target cannot be met on-site, the Council in this instance would accept a financial contribution of £106,893 to be secured via S106. The cost per tonne of carbon when the application was submitted (pre-October 2016, before the zero carbon homes policy commenced) was £90 per tonne. The financial

contribution is calculated based on the failure to reduce carbon by 1187.7 tonnes (over 30 years) x £90 = £106,893.

- 15.5 The proposal includes a gas fired Combined Heat and Power (CHP) which would be future proofed to enable connection to a decentralised energy network should one become available and should connection be considered viable at that point in time. This would be secured through the S106. The system would need to be designed following recommendations set in the 'District Heating Manual for London' and an allowance made for indicative pipework routes and heat exchanger positions within the design. The CHP would be sized to meet hot water demands for the development and the electrical demand from the commercial and residential common areas. A 40kWt gas-fired CHP (with backup boilers) is proposed. Sizing and required thermal storage are to be confirmed at the detailed design stage. This results in a 14.35% reduction in carbon.
- 15.6 Comfort cooling is proposed in the top floor flats of Building 1 to 'mitigate the identified risk of overheating'. The risk of overheating is only relevant to a couple of living rooms and a condition would be attached to restrict it to those areas. The Council would only accept comfort cooling in the living rooms that fail the overheating criteria. Cooling within properties for market expectation purposes is therefore resisted and will be prohibited by planning condition. Modelling for the supported living apartments in the form of an overheating assessment would be secured via condition. These units would be bespoke and handed over to Camden on completion, meaning the exact details will be unknown until the detailed design has been developed.
- 15.7 The provision of renewable energy has been outlined within the Energy Efficiency and Renewable Plan, which would be secured by S106. The proposal includes solar PVs and would be secured via planning condition.
- 15.8 The S106 would secure the following:
- Residential and non-residential sustainability measures secured through Sustainability Plan indicating: BREEAM 'Very Good' in the self-storage space and BREEAM 'Excellent' in the offices with minimum BREEAM credit targets in Energy (60%), Materials (40%) and Water (60%) for both uses
 - Carbon offset contribution of £106,893
 - CHP details and future proofing details for connecting to a decentralised energy network
 - Energy provisions secured through Energy Efficiency and Renewable Plan – 16.8% site-wide emissions reduction beyond Part L 2013
 - Water efficiency targets would be secured by planning condition

16. Air Quality

- 16.1 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. The site lies within an Air Quality Management Area, designated due to elevated concentrations of annual mean concentration of NO₂ and 24hr mean concentration of PM₁₀. Emerging Policy CC4 states that its focus is to mitigate the impact of development on air quality and to ensure exposure to poor air quality is reduced. Given the scale and location of the proposal, Hilson Moran submitted an 'Air Quality Assessment' (AQA) to support the planning application. The report concludes that with the implementation of suitable mitigation measures and good site practice, the effects from construction dust can be controlled and the residual effect would not be significant. It also predicted that the development would result in negligible residual NO₂ and PM₁₀ and it was confirmed that the absolute concentrations fall within the UK air quality objective.
- 16.2 The Council's Sustainability and Air Quality Officers sought further details of the impact of the development on local air quality, on future occupiers and impacts during construction. The applicant submitted further details regarding the CHP, modelling, air quality neutral calculations and mitigation measures. Following receipt of the additional information, the Council's relevant officers were satisfied subject to conditions relating to details of the mechanical ventilation and air quality monitoring. The submitted details and assessment by officers confirmed that the proposal would be air quality neutral as required by the London Plan. This was following an air quality neutral assessment showing compliance with the total transport and buildings emissions benchmarks.

17. Trees and Landscaping

- 17.1 The existing site contains a lack of public open space. The landscape features are not extensive and consist of a car parking area associated with the Highgate Centre. The car parking is edged with grass, informal planting, and a cherry tree and Norway maple tree. The existing pavements and public realm around the site are not particularly well finished and contain a mixed quality of materials. The pavements mostly consist of concrete paving slabs or tamped concrete and granite kerbs. At street level along Highgate Road, the greenery includes a row of six trees in front of the Highgate Centre and a Norway Maple at its eastern end close to the Greenwood Place junction. A small Cider gum lies next to the maple. No other significant trees are located within the site boundary. The extant permission under 2013/5947/P, which has commenced and the works within it can be undertaken, included the removal of these eight trees within the site. Therefore, the Council has considered the removal of these trees acceptable. The works could be undertaken in accordance with the extant approval exclusively of this application. Furthermore, no tree preservation orders are relevant to the site nor does it fall within a conservation area (so permission would not be needed in any event to remove the trees).
- 17.2 A Tree Report was prepared by Hilson Moran as an appendix to the Ecology Appraisal. The report considers that all of the trees on-site, barring the Norway Maple on the corner, are Category C trees which means they are of low quality and

value and would not usually be retained where they would constrain a development. Officers therefore do not object to their removal. The Norway Maple is considered to be a Category B2 (significant due to its landscape qualities) which means that it should be considered as a constraint to development and every attempt should be made to incorporate it into any proposed development design. The report notes that it has moderate quality and value. Officers consider that the tree is a reasonable specimen, which provides visual amenity and softens a streetscape otherwise largely devoid of trees. The retention of this tree within the development would have been desirable; however, it is noted that its loss has already been permitted under 2013/5947/P. The implications of retaining the tree for the approved and proposed development, would be to reduce the building footprint. Reducing the footprint of either scheme would affect the number of units and viability of the schemes overall. Furthermore, in terms of design and building composition, this would not be improved by setting the building back from the Greenwood Place junction and thus weakening the relationship with Linton House on the opposite side of this junction. The bulk of Linton House and its positioning hard against the back of the footway in any event limits visibility of the existing tree in views from the north along Highgate Road. On balance, it is considered that the improved relationship of the proposed building with its townscape context compared with the existing, and the benefits of the scheme generally outweigh any harm from the tree's loss.

- 17.3 The loss of the other trees (C Category) within the site is considered acceptable as they are largely poor specimens with limited amenity value. There would be opportunities for boundary planting at the front of the proposed buildings due to its setback from the footway, which would re-establish a softening of this frontage at pedestrian level. While the proposed plans do not indicate planting in this area, the applicant has agreed in principle to provide these details as part of a planning condition. They acknowledge that the site has a wide pavement and long frontage, meaning that there would be ample scope for planting along Highgate Road. The applicant would also be required to explore with the Borough's Highways Officers opportunities for replacement street tree planting elsewhere on the highway. They have agreed to pay for the costs of this through a S106 contribution.
- 17.4 Further to the street-level landscaping, which would be secured via condition and legal agreement, the proposal would include other landscaping measures throughout the scheme:
- the public route through the site with low level planting
 - planting within the large commercial terrace on the 2nd floor of Building 1
 - a green roof to Building 2
 - an extensive bio-diverse green roof to the top of Building 1
 - a row of trees alongside the A&A Self-Storage loading bays (on Greenwood Place)
 - a row of planters along the southern boundary of the site
 - landscaped buffer areas on Buildings 1 and 2
- 17.5 Planning conditions are recommended for tree protection details for an existing tree at the neighbouring church as well as a landscaping condition for the above. In addition, the applicant would be required to make a payment (S106) towards the

provision of replacement street tree planting in the vicinity of the development on Highgate Road.

18. Flooding and Drainage

- 18.1 The site is located 325m to the west of the Maitland Park Local Flood Risk Zone (LFRZ). The risk of surface water flooding is deemed to be moderate. A Flood Risk Assessment (FRA) has been submitted by Hilson Moran, which identifies Greenwood Place as having a high surface water flood risk. Highgate Road has been affected by floods and mitigation measures are therefore required. The mitigation measures proposed include the installation of manually operated hydrostatic (dismountable) flood barriers along the north and west boundaries of the site. The report also recommends that windowsill levels be raised to 600mm. The location of the flood barriers allows step free access onto Highgate Road. Responsibility for the erection of all barriers would remain with site management (the development is confirmed to have two site managers with 24/7 presence on site). Site management would register to receive EA/Met Office warnings of potential flash flooding. Anti-flood valves would also be installed. These measures are included in the proposed drawings.
- 18.2 The NPPF requires all major developments to include Sustainable Urban Drainage Systems (SuDS) unless demonstrated to be inappropriate (as set out in the Ministerial Statement by the Secretary of State on 18 December 2014). Major developments should achieve greenfield run-off rates wherever feasible and as a minimum 50% reduction in run off rates. Development should also follow the drainage hierarchy in policy 5.13 of the London Plan.
- 18.3 Infiltration SuDS are not suitable due to the presence of a two-storey basement and shallow contamination. Artificially raised planters would be proposed throughout the scheme to mitigate any loss in permeable areas as a result of the development in addition to an attenuation tank and permeable paving to attenuate and restrict flows and green/blue roofs. Full details of the SuDS extent and position, drainage network, and exceedance flows would be secured through condition.
- 18.4 The applicant is proposing 50% reduction in existing run-off rates for all peak storm events. The variable discharge rate would be achieved through 'complex flow control' 'Hydroslide', orifice plate or 'Hydrobrake'. Initial storage calculations exceed the minimum requirements, which is welcomed and final microdrainage calculations would be provided through condition at detailed design stage.
- 18.5 In addition to the above conditions Thames Water have requested details of a draining strategy and a piling method statement. These would be secured via planning condition.

19. Community Safety

- 19.1 CS17 aims to make Camden a safer place promoting safer streets and public areas. Emerging policy C5 requires developments to demonstrate that they have incorporated design principles that contribute to community safety and security. It also states that the Council will promote safer streets and public areas, and the

development of pedestrian friendly spaces. A 'Crime Impact Assessment' has been submitted as part of the Design and Access Statement, which sets out that the proposed development has been designed in accordance with 'Secured by Design' principles. The assessment anticipates that the proposal would improve the existing condition of the immediate area with safer routes through and around the site, more activity through the enlarged and new uses and careful design features at ground floor level to minimise opportunities for crime and anti-social behaviour (ASB). The measures of the proposal include well-lit public spaces with limited areas for attackers to hide; passive surveillance; good quality public realm; CCTV; controlled entry to uses; loading and storage areas would be managed and secure; open and clear signage; no blank elevations or dead ends and no features that could be used as climbing aids.

- 19.2 The proposal includes a route through the middle of the site to gain access to the residential and commercial uses within the two proposed buildings and the Greenwood CIL. This would become a public route and accommodate movements into and through the site to promote the accessing of facilities and opportunities. It would connect the development and the CIL (currently being developed) behind it to the local streetscene and the surrounding area, promoting social cohesion and a much-needed link through. Management of the new pedestrianised route would ensure appropriate levels of safety and security. The provision of gates to this main route are considered unacceptable in principle. Gates are proposed for the new side route between Building 2 and the church (named Church Walk). Details of the gates and security system would be secured by planning condition.
- 19.3 The proposal has been reviewed by a Designing Out Crime Officer who suggested specifications for elements of the design features.

20. Waste

- 20.1 A refuse bin store would be provided within the ground floor rear of Building 2 to be utilised by the residential element of the scheme. It is estimated that refuse collection would take place twice weekly. Residents would be required to transport their waste from their individual apartments directly to the waste storage area using the residential passenger lifts where they would segregate their waste into the appropriately labelled bins. Two further residential refuse stores are located within the first floor of Building 1. An office refuse store is provided at first floor level within Building 1. Its collection would be taken to the bin store by office or site management staff. The self-storage use would have its refuse storage on the ground floor within the carpark. It is not anticipated that the proposed occupier would require much space for refuse storage. If the needs of future occupiers changed there would be scope for reallocating further space within the ground floor of double storey basement.
- 20.2 Regarding the collection of refuse from Building 2, the applicant has confirmed that there would be no need for refuse trucks to pull up outside the Greenwood CIL. Appendix F of the Transport Assessment confirms the manoeuvre the refuse vehicle would perform, driving to the corner of Building 2 and then reversing and driving out the way it arrived, towards Highgate Road, and therefore stopping well short of the pedestrian walkway through the site and the Greenwood CIL. The bins

would be under the control of the building's management and the managers would bring the bins to the refuse vehicle. A condition is recommended prior to the commencement of the development for details of the location, design and method of waste storage and removal including recycled materials for both the commercial and residential uses. Therefore, these details are reserved for the Council to consider and to ensure they are satisfactory. The final details would need to be agreed the Council's Principal Environmental Services Officer.

21. Local employment and procurement

21.1 The proposed development is large enough to generate significant local economic benefits. Policy CS19, emerging policy E1 and CPG8 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. A range of training and employment benefits would be secured via S106 to provide opportunities during and after the construction phase for local residents and businesses. This would include:

- The applicant should work to CITB benchmarks for local employment when recruiting for construction-related jobs as per clause 8.28 of CPG8.
- The applicant should advertise all construction vacancies and work placement opportunities exclusively with the King's Cross Construction Skills Centre for a period of 1 week before marketing more widely.
- The applicant should provide a specified number (to be agreed) of construction or non-construction work placement opportunities of not less than 2 weeks each, to be undertaken over the course of the development, to be recruited through the Council's King's Cross Construction Skills Centre.
- As the build costs of the scheme exceed £3 million the applicant must recruit 1 construction or non-construction apprentice per £3 million of build costs, and pay the council a support fee of £1,700 per apprentice as per clause 8.25 of CPG8. Recruitment of construction apprentices should be conducted through the Council's King's Cross Construction Skills Centre.
- The applicant to sign up to the Camden Local Procurement Code, as per section 8.30 of CPG8.
- The S106 should broker a meeting between the end user and the Economic Development team to discuss our employment and skills objectives.
- The applicant should provide a local employment, skills and local supply plan setting out their plan for delivering the above requirements in advance of commencing on site.
- The applicant must recruit a specified number (to be agreed) of non-construction apprentices to be employed at the development and pay the council a support fee of £1,700 per apprentice as per clause 8.26 of

CPG8. Recruitment of non-construction apprentices should be conducted through the Council's Economic Development team.

- Alongside the normal construction phase requirements, the Council would secure a cash contribution towards employment and skills opportunities for residents as this scheme represents an uplift in employment floorspace of more than 1000m². The amount would be £87,474.52. In line with CPG8 para 8.32, the amount is calculated as follows:

Net increase in employment floorspace (3,267m²)/Floorspace per employee (12) = FTE jobs created (272)

FTE jobs created (272) x % of Camden employees in the workforce (23%) x % of Camden residents requiring training (35%) x £3,995 (cost of training per employee) = £87,474.52 (figure dependent on exact increase in floorspace proposed)

22. Play and Open Space

22.1 Policy DP31 requires an 'appropriate contribution' to open space, with priority given to publicly accessible open space. Emerging policy A2 gives priority to securing new public open space on-site, with provision of space off-site near to the development acceptable where on-site provision is not achievable. If there is no realistic means of direct provision, the Council may accept a financial contribution in lieu of provision. In this instance, one of the priorities of the development is creating a pedestrian link through the site to the Greenwood CIL. This provision reduces the scheme's ability to provide public open space on-site, as the majority of the external space at street level is designated for this purpose.

22.2 The scheme provides 60 residential units with an additional 3,436m² (GEA) of commercial (B1 and B8) floorspace. Based on the increased demand for open space from the uplift in residents and workers occupying the site, provision of open space is expected with the priority being on-site. A pedestrian route is being created between Highgate Road and Greenwood Place as mentioned above. While this would provide a valuable link through the site and would be of significant benefit to the accessibility and visual prominence of the Greenwood CIL, it is not considered to contribute towards public open space, as it would be primarily used to access the centre and the various parts of the development. Policy DP31 states that '*areas that need to be paved because of the number of anticipated pedestrians may not be considered to contribute towards the open space provision*'. The site is within 800m of Hampstead Heath, which is significantly further than the requirement of 280m for public amenity space within CPG6 (Amenity). In addition, there is no play space within the 50m Local Areas for Play (LAP) and the 280m Local Equipped Areas for Play (LEAP) - Falkland Place open space is just outside this, and across Highgate Road. 215m² of amenity space would be provided for the office uses. This could only be accessed by the private users of the commercial floorspace and is located on the first floor so would not form a contribution to public open space. Given the lack of play and open space provision in the area, it is unfortunate that there is not a provision of on-site public space. Despite this, the

benefit of providing a route through is of considerable benefit to the Greenwood CIL and the wider area considering the area behind the site (Murphy's Yard) may come forward for a comprehensive redevelopment in the future. Therefore, as there is no realistic means of direct provision, the scheme would be acceptable and in accordance with policy subject to a S106 financial contribution to local open space provision.

22.3 CPG6 requires 9m² of open space per residential occupier and 0.74m² per worker. Based on the number of units provided and their size the development it would provide 198 occupiers. The development would have a net increase in floorspace of 3,436m² which would be divided by 12 (space requirement per full-time employment) to give 286 workers. Therefore, the open space requirement for the development would be 1,782m² (198 x 9) for the residential component and 211.64m² (0.74 x 286) for the employment uses. A payment in lieu of the 1,993.64m² requirement must therefore be calculated towards the provision, maintenance and improvement of open space in accordance with CPG6 (Amenity) and CPG8 (Planning Obligations) must be calculated.

22.4 The financial contribution has been calculated in accordance with figure 4 of CPG8 with the workings for the required payment of £82,903 below:

| | Capital Cost | Maintenance | Design and Project Management | Total |
|---|----------------|----------------|-------------------------------|----------------|
| 1 beds (24) | £9,240 | £9,264 | £1,104 | £19,608 |
| 2 beds (29) | £19,663 | £16,269 | £2,320 | £38,252 |
| 3 beds (7) | £9,282 | £5,824 | £1,113 | £16,219 |
| | | | | |
| Employment Space (per 1,000m ²) | £4,132.76 | £4,194.83 | £496.59 | £8,824.18 |
| | | | | |
| Total | £42,318 | £35,552 | £5,034 | £82,903 |

23. Contaminated Land

23.1 The site is located on a former unknown industrial Coach Building Works and adjacent to a former Chemical Works and Cabinet Works all of which have a medium to very high-risk potential of causing ground contamination. The Council's Contamination Officer reviewed Hilson Moran's 'Preliminary Phase II Contamination Assessment'. The preliminary site investigation recorded the presence of TCE and PCE solvents in soils underlying the site. The levels of contamination are low and no risk is identified to current site users. The source of contamination is believed to have originated from the neighbouring former chemical warehouse (the Greenwood Centre to the rear) that was operated by Imperial Chemical Industries (ICI) around the 1950s. Site attendance records by ICI in the 1940s and 1950s confirm the storage and distribution of TCE solvent from this warehouse. No other evidence of contamination was identified; however, further investigation is necessary post planning and following clearance of the existing site

buildings. On this basis, it is recommended that contaminated land conditions be attached to any approval for high-risk situations. This would include details of a scheme of assessment, site investigation, a remediation scheme and relevant reporting and management.

24. Archaeology

24.1 The site lies within the Kentish Town Archaeological Priority Area, which is defined as an area of medieval settlement. Museum of London Archaeology (MOLA) has submitted a Historic Environment Assessment. It indicates that the main potential is for palaeoenvironmental remains associated with a tributary of the ancient Fleet River and the footings or foundations of post-medieval buildings. The report indicates that the site has low-medium potential for significant remains. Following the consultation of Historic England Greater London Archaeology Advisory Service (GLAAS), they stated that the proposed development could potentially remove any archaeological remains given it would include a large 2-storey basement. Therefore, a condition would be attached to any planning permission requiring a two-stage process of archaeological investigation. This would include an evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation.

25. Other Matters

25.1 Objections were received relating to the uplift of the 60 residential units increasing demand for the already stretched services in the area. This includes doctors, schools, hospitals, public transport and other local services. A development of this size is not expected to overly burden these existing facilities, and is not considered large enough to have a requirement to provide its own local infrastructure. On-site provision is usually appropriate for large major developments, which are defined as 200 or more units. CPG8 (Obligations) recognises in section 4 (community facilities) that Community Infrastructure Levy funds will be used to address the cumulative impacts of developments on school places, community centres, healthcare and recreation facilities. As per the estimate in para 26.1, the Community Infrastructure Levy is likely to exceed £4 million based on the total proposed floor area. Furthermore, the proposal would enable the Greenwood CIL to be funded and implemented which would provide a significant community facility.

25.2 A revised application form was received on 11/05/2017 to correct minor errors and update the proposed floor areas. The amendments include the listing of both relevant postcodes for the buildings and it was confirmed that there are trees/hedges on the development site and adjacent to the site. The description of the development was updated to confirm the height of the proposal, the floor areas of the uses, the types of uses ('community' café was included) and the creation of the terraces and balconies. Officers can confirm that the postcodes within the site address are correct for both properties.

25.3 An objection was received regarding the storing of potential hazardous substances within the self-storage (B8) use. The rationale to this issue is that people could effectively store whatever goods they wish within the basement under the buildings. Such a matter is not a material planning consideration and is covered under other

relevant legislation. Notwithstanding this, the storage units would be supervised and managed and any flammable substances or objects would be controlled by fire regulations.

26. Section 106, s.16 of the Greater London Council (General Powers) Act 1974 Obligations and other local authority powers

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

- **Affordable housing** – Delivery and transfer to Council of 8 x 1 bedroom/2 person social rented supported units on the ground floor and part first floors of the buildings
- **Construction/Demolition Management Plan (CMP)** - including monitoring contribution of £17,500
- **Car-free development** - for both residential and commercial uses
- **Employment floorspace plan** - to secure flexible office space, with a range of unit sizes and tenancy/license terms, commitment to marketing the space locally
- **Pedestrian route through** – securing the route through the site as a public right of way
- **Local employment, skills and local supply plan** - including a contribution towards employment and skills opportunities £87,474.52
- **Highways contribution (TBC)**
- **Travel Plan** - including monitoring contribution of £6,244
- **Landscape and Ecological Management Plan**
- **Parking Management Plan**
- **Approval in Principal** - associated assessment fee of £5,400
- **Public Open space contribution** - £82,903
- **Clause to prevent office space (B1a) being converted into residential**
- **Sustainability Plan** – BREEAM 'Very Good' in the self-storage space and BREEAM 'Excellent' in the offices with minimum BREEAM credit targets in Energy (60%), Materials (40%) and Water (60%) for both uses
- **Energy Efficiency and Renewable Plan** – 16.8% site-wide emissions reduction beyond Part L 2013
- **Carbon offset contribution** - £106,893
- **CHP and future proofing details for connecting to a decentralised energy network**
- **Level Plans**
- **Basement Construction Plan (BCP)**
- **Service Management Plan**
- **Street tree contribution** - £tba
- **Securing of the 'community' café use**

27. Community Infrastructure Levy (CIL)

27.1 The proposal would be liable for both the Mayor of London's CIL and Camden's CIL due to the significant net increase in floorspace and creation of residential units. 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 £4,336,025. The CIL estimate is based on the following calculations (the site lies within Zone C – Highgate, Hampstead):

- Mayoral CIL (13,284m² x £50) = £664,200
- A3 use Camden CIL (95m² x £25) = £2,375
- B1 office use Camden CIL (1,798m² x £25) = £44,950
- C3 floorspace Camden CIL (7,031m² x £500) = £3,515,500
- B8 floorspace Camden CIL (4,360m² x £25) = £109,000

28. CONCLUSION

28.1 The proposed development would result in a comprehensive, mixed-use redevelopment of the A&A Self-Storage and Highgate Centre sites with the following benefits:

- a pedestrian walkway linking the new Greenwood Centre for Independent Living with Highgate Road
- 8 assisted living units, which would be bespoke and created for the specific needs of the end user, given to be operated by the Council in association with the Greenwood Centre for Independent Living
- a 'community' café on Highgate Road would be created and provided to the Council for use in association with the Greenwood Centre for Independent Living
- additional office floorspace, with an uplift of 1,035m² (GEA), and provision of high quality and flexible spaces
- additional self-storage space, with an uplift of 2,401m² (GEA), and the enhancement of its quality and relocation to be subterranean to ensure any associated impacts are mitigated in terms of noise and general disturbance
- provision of 60 residential units that would result in a high standard of living accommodation for the prospective occupiers
- provision of a high quality public realm that provides animation to the streetscape, clearly defined entrances to buildings and defensible thresholds to sensitive ground floor residential units
- redevelopment of a site that detracts from the townscape due to its scale, poor quality buildings and public realm by providing a high quality development

- significant contributions towards the provision of local infrastructure and facilities are proposed through Community Infrastructure Levy, financial contributions in the S106 and public realm improvements

- 28.2 Paragraph 14 of the NPPF states that there is a presumption in favour of sustainable development, which should be a golden thread running through decision-making. The dimensions of sustainable development are economic, social and environmental which should be sought jointly. The proposed development would result in significant benefits through all three strands of sustainable development without any adverse impacts significantly or demonstrably outweighing them. On balance, the development is considered to be appropriate and in accordance with relevant National and Regional Policy, the development plan (Core Strategy and Development policies), the emerging Camden Local Plan Submission Draft 2016 and Camden Planning Guidance for the reasons noted above.
- 28.3 Planning Permission is recommended subject to a S106 Legal Agreement securing the clauses set out in paragraph 26.1 (above) and the planning conditions below (paragraph 29.1).

29. LEGAL COMMENTS

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

Condition(s) and Reason(s): **2016/5372/P**

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

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

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

Existing and Demolition Drawings: (JA12_Z0_)P_00_001 Rev A; E_NE_001 Rev A; E_NW_001 Rev A; E_NE_001 Rev A; E_SE_001 Rev A; E_SW_001; SS_AA_001 Rev A; SS_BB_001 Rev A; SS_CC_001 and (JC20_Z0_)E_NE_001 Rev A; E_NW_001 Rev A; E_SE_001 Rev A; E_SW_001 Rev A; P_00_001 Rev A;

Proposed Drawings: (C645_)Z0_P_00_001 Rev D; P_00_001 Rev E; P_01_001 Rev B; B0_P_02_001 Rev C; P_03_001 Rev B; P_04_001 Rev B; P_05_001 Rev B; P_06_002 Rev B; P_07_001 Rev C; P_B1_001 Rev B; P_B2_001 Rev B; P_RF_002 Rev C; B1_E_NE_001 Rev C; B1_E_NW_001 Rev E; B1_E_SE_001 Rev D; B1_E_SW_001 Rev E; B2_E_NE_001 Rev F; B2_E_NW_001 Rev C; B2_E_SE_001 Rev F; B2_E_SW_001 Rev C; Z0_NE_002 Rev G; Z1_E_01_001 Rev B; Z1_E_02_001 Rev B; Z1_E_03_001 Rev C; Z1_E_04_001 Rev B; Z1_E_05_001; Z1_E_06_001; Z1_E_07_001 Rev A; Z1_E_08_001; Z1_E_09_001 Rev A; Z2_D_001-004; Z2_E_01_001 Rev B; Z2_E_02_001 Rev C; Z2_E_03_001; Z2_E_04_001 Rev A; S_AA_001 Rev C; S_BB_001 Rev C; S_CC_001 Rev C;

S_DD_001 Rev C; Z0_SS_AA_001 Rev C; Z0_SS_BB_001 Rev C; Z0_SS_CC_001 Rev C; Z0_P_00_002 Rev A; Z0_E_NE_001 Rev G; Z1_D_001-006 and (D811_P_)00_001 Rev A; 00_002 Rev A; 01_001 Rev A; 01_002 Rev A; 00_003-006 Rev B; D_01_001.

Supporting Documents: Affordable Housing and Economic Viability Assessment dated 26/09/2016; Construction Management Plan pro forma v2.1; Daylight and Sunlight (ref: 7554) dated 23/09/2016; Design and Access Statement dated September 2016; Ecology Appraisal (ref: 20186/S/ECO01/04) Rev 04 dated 23/09/2016; Energy Strategy (ref: 17411/S/ES01/03) Rev 03 dated 26/09/2016; Flood Risk Assessment (ref: 20186/S/FRA01/03) Rev 03 dated 27/09/2016; Heritage Statement dated September 2016; Historic Environment Assessment dated May 2016; Planning Statement dated September 2016; Residential Travel Plan; Statement of Community Involvement dated September 2016; Sustainability Statement (ref: 17411/S/RT01/03) Rev 03 dated 26/09/2016; Transport Assessment; Workplace Travel Plan; Acoustics Planning Report (ref: 20186/A/AC01/03) Rev 03 dated 26/09/2016; Air Quality Assessment (ref: 20186/S/AQA03/03) Rev 03 dated 12/05/2016; BREEAM 2014 Pre-assessments Greenwood Place/Highgate Road (ref: 20186/S/BRE01/01) Rev 01 dated 26/09/2016; Preliminary Phase II Contamination Assessment (ref: 20186/S/RT02/01) Rev 01 dated 27/09/2016; Civil & Structural Concept Report Issue P2 dated 22/09/2016; Tree Report (ref: PRI20128tr) dated 10/09/2019; Health Impact Assessment dated October 2016; Basement Impact Assessment (ref: CG/18500) Rev 2 dated May 2016; Below Ground Drainage Strategy Issue P1 07/03/2016; Residential Overheating Risk (ref: 17411/S/TC01/00) Rev 00 dated 20/12/2016; HM Responses to comments received from Camden Council; CGL Response to comments (ref: CG/18500) dated 28/02/2016; Ground Investigation Report; Daylight and Sunlight (ref: 7554) dated 13/01/2017.

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

- 3 Notwithstanding the approved drawings and documents, detailed drawings, or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the local planning authority before the relevant part of the work is begun:
 - a) Details including sections at 1:10 of all windows (including jambs, head and cill), ventilation grills, external doors and gates
 - b) Plan, elevation and section drawings, including fascia, cornice, entrances, pilasters and glazing panels of the ground floor facades/shopfronts of Buildings 1 and 2 at a scale of 1:10
 - c) Manufacturer's specification details of all facing materials (to be submitted to the Local Planning Authority) and samples of those materials to be provided on site, including a sample panel of the facing brickwork demonstrating the proposed colour, texture, face-bond and pointing
 - d) Detailed drawings of the 'A&A' signage on the north west and south east elevations of Building 1, including sections at 1:10, and confirmation of its size and zone

e) Details, including security system, of the gates securing Church Walk adjacent to Building 2 including materials and elevations

f) Plan, elevation and section drawings of the balconies, balustrades and pavilion of the attic storeys

g) Details of all lighting to the public realm including external lighting to the elevations, lighting of entrance areas, control of access points and CCTV.

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

Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy CS14 of the London Borough of Camden Local Development Framework Core Strategy, policy DP24 of the London Borough of Camden Local Development Framework Development Policies and policy D1 of the Camden Local Plan Submission Draft 2016.

- 4 No lights, meter boxes, flues, vents or pipes, and no telecommunications equipment, alarm boxes, television aerials, satellite dishes or rooftop 'mansafe' rails shall be fixed or installed on the external face 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, policy DP24 of the London Borough of Camden Local Development Framework Development Policies and policy D1 of the Camden Local Plan Submission Draft 2016.

- 5 Prior to the occupation of the development, full details of screening, balustrade treatment and other measures to reduce instances of overlooking and loss of privacy to neighbouring occupiers from the commercial and residential terraces and balconies within the development shall be submitted to and approved in writing by the local Planning Authority. The development shall be carried out in accordance with the details thereby approved and permanently maintained thereafter.

Reason: In order to prevent unreasonable overlooking of neighbouring premises in accordance with the requirements of policy CS5 of the London Borough of Camden Local Development Framework Core Strategy, policy DP26 of the London Borough of Camden Local Development Framework Development Policies and policy A1 of the Camden Local Plan Submission Draft 2016.

- 6 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, amenity spaces, green/brown roofs, landscaped buffer areas and the pedestrian route through) 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 enable the Council to ensure a reasonable standard of visual amenity in the scheme in accordance with the requirements of policy CS14 and CS15 of the London Borough of Camden Local Development Framework Core Strategy, policy DP24 of the London Borough of Camden Local Development Framework Development Policies and policy D1 of the Camden Local Plan Submission Draft 2016.

- 7 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 enable the Council to ensure a reasonable standard of visual amenity in the scheme in accordance with the requirements of policy CS14 and CS15 of the London Borough of Camden Local Development Framework Core Strategy, policy DP24 of the London Borough of Camden Local Development Framework Development Policies and policy D1 of the Camden Local Plan Submission Draft 2016.

- 8 Prior to the commencement of any works on site, details demonstrating how trees to be retained (both within the site and on surrounding sites) shall be protected during construction work shall be submitted to and approved by the Council in writing. Such details shall follow guidelines and standards set out in BS5837:2012 "Trees in Relation to Construction". All trees on the site, or parts of trees growing from adjoining sites, unless shown on the permitted drawings as being removed, shall be retained and protected from damage in accordance with the approved protection details.

Reason: To enable the Council to ensure a reasonable standard of visual amenity in the scheme in accordance with the requirements of policy CS14 and CS15 of the London Borough of Camden Local Development Framework Core Strategy, policy DP24 of the London Borough of Camden Local Development Framework Development Policies and policy D1 of the Camden Local Plan Submission Draft 2016.

- 9 The 'community' cafe (A3) use hereby permitted shall not be carried out outside the following times: 07:00hrs to 23:30hrs Monday to Saturday and 08:30hrs to 10:30hrs on Sundays and Bank Holidays.

Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies CS5 and CS7 of the London Borough of Camden Local Development Framework Core Strategy, policies DP12, DP26 and DP28 of the London Borough of Camden Local Development Framework Development Policies and policies A1, A4 and TC1 of the Camden Local Plan Submission Draft 2016.

- 10 The approved office amenity space on the second floor of Building 1, as shown on the 2nd floor plan C645_B0_P_02_001 Rev C, shall be used by the office (B1a) uses of the building only and shall not be used outside the hours of 08:00 and 21:00 Monday-Friday.

Reason: In order to prevent unreasonable overlooking of neighbouring premises and noise and general disturbance in accordance with the requirements of policy CS5 of the London Borough of Camden Local Development Framework Core Strategy, policy DP26 of the London Borough of Camden Local Development Framework Development Policies and policy A1 of the Camden Local Plan Submission Draft 2016.

- 11 Notwithstanding the provisions of Class B8 of the Schedule of the Town and Country Planning (Use Classes) Order, 1987, or any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order, the self-storage use within the basement and parts of the ground floor shall be used as a self-storage business only and for no other purpose.

Reason: To ensure that the future occupation of the premises does not adversely affect the prospective occupiers of the development, adjoining premises and surrounding area by reason of noise and general disturbance in accordance with policy CS5 of the London Borough of Camden Local Development Framework Core Strategy, policies DP26 and DP28 of the London Borough of Camden Local Development Framework Development Policies and policies A1 and A4 of the Camden Local Plan Submission Draft 2016.

- 12 Prior to commencement of the development (other than site clearance and preparation, relocation of services, utilities and public infrastructure and demolition), details shall be submitted to and approved in writing by the Council, of an enhanced sound insulation value $D_{nT,w}$ and $L'_{nT,w}$ of at least 5dB above the Building Regulations value, for the floor/ceiling/wall structures separating different types of rooms/uses in adjoining dwellings, namely living rooms and kitchen above bedroom of separate dwellings. Approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.

Reason: To safeguard the amenities of the prospective residential occupiers of the development and the area generally in accordance with the requirements of policies CS5 and CS7 of the London Borough of Camden Local Development Framework Core Strategy, policies DP26 and DP12 of the London Borough of Camden Local

Development Framework Development Policies and policies A1 and H6 of the Camden Local Plan Submission Draft 2016.

- 13 Prior to commencement of the development (other than site clearance and preparation, relocation of services, utilities and public infrastructure and demolition), details shall be submitted to and approved in writing by the Council, of the sound insulation of the floor/ceiling/walls separating the commercial part(s) of the premises from noise sensitive premises. Details shall demonstrate that the sound insulation value $D_{nT,w}$ and $L'_{nT,w}$ is enhanced by at least 10dB above the Building Regulations value and, where necessary, additional mitigation measures are implemented to contain commercial noise within the commercial premises and to achieve the criteria of BS8233:2014 within noise sensitive premises. Approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.

Reason: To safeguard the amenities of the prospective residential occupiers of the development and the area generally in accordance with the requirements of policies CS5 and CS7 of the London Borough of Camden Local Development Framework Core Strategy, policies DP26 and DP12 of the London Borough of Camden Local Development Framework Development Policies and policies A1 and H6 of the Camden Local Plan Submission Draft 2016.

- 14 The noise level in rooms at the development hereby approved shall meet the noise standard specified in BS8233:2014 for internal rooms and external amenity areas.

Reason: To safeguard the amenities of occupiers of the proposed use, 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, policies DP26 and DP28 of the London Borough of Camden Local Development Framework Development Policies and policy A4 of the Camden Local Plan Submission Draft 2016.

- 15 Prior to commencement of the development (other than site clearance and preparation, relocation of services, utilities and public infrastructure and demolition), details shall be submitted to and approved in writing by the Council, of the external noise level emitted from plant/machinery/equipment and mitigation measures as appropriate. The measures shall ensure that the external noise level emitted from plant, machinery/equipment will be lower than the lowest existing background noise level by at least 5dBA, by 10dBA where the source is tonal, as assessed according to BS4142:2014 at the nearest and/or most affected noise sensitive premises, with all machinery operating together at maximum capacity. A post installation noise assessment shall be carried out where required to confirm compliance with the noise criteria and additional steps to mitigate noise shall be taken, as necessary. Approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.

Reason: To safeguard the amenities of occupiers of the proposed use, 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, policies DP26 and DP28 of the London Borough of Camden Local Development

Framework Development Policies and policy A4 of the Camden Local Plan Submission Draft 2016.

- 16 Prior to commencement of the development (other than site clearance and preparation, relocation of services, utilities and public infrastructure and demolition), details of anti-vibration measures shall be submitted to and approved in writing by the Council. The measures shall ensure that all machinery, plant/equipment, extract/ventilation system and ducting are mounted with proprietary anti-vibration isolators and fan motors are vibration isolated from the casing and adequately silenced. Approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.

Reason: To safeguard the amenities of occupiers of the proposed use, 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, policies DP26 and DP28 of the London Borough of Camden Local Development Framework Development Policies and policy A4 of the Camden Local Plan Submission Draft 2016.

- 17 Prior to occupation of the hereby approved development, details of the location, design and method of waste storage and removal including recycled materials, for all uses on-site, shall be submitted to and approved by the local planning authority in writing. The facility as approved shall be provided prior to the first occupation of any of the new units and permanently retained thereafter.

Reason: To ensure that sufficient provision for the storage and collection of waste has been made in accordance with the requirements of policy CS18 of the London Borough of Camden Local Development Framework Core Strategy, policies DP26, DP28 and DP12 of the London Borough of Camden Local Development Framework Development Policies and of the London Borough of Camden Local Development Framework Development Policies and policies A1 and CC5 of the Camden Local Plan Submission Draft 2016.

- 19 Before development commences, a site investigation shall be undertaken in accordance with the approved scheme of assessment and the written results provided to the local planning authority for their approval. Laboratory results must be provided as numeric values in a formatted electronic spread sheet. Before development commences a remediation scheme shall be agreed in writing with the local planning authority and the scheme as approved shall be implemented before any part of the development hereby permitted is occupied.

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, policy DP26 of the London Borough of Camden Local Development Framework Development Policies and policy A1 of the Camden Local Plan Submission Draft 2016.

- 20 Additional significant contamination discovered during development shall be fully assessed and any necessary modifications made to the remediation scheme shall be submitted to the Local Planning Authority for written approval. Before any part of the development hereby permitted is occupied the developer shall provide written confirmation that all works were completed in accordance with the revised remediation scheme.

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, policy DP26 of the London Borough of Camden Local Development Framework Development Policies and policy A1 of the Camden Local Plan Submission Draft 2016.

- 21 Notwithstanding the approved drawings, 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 177 spaces (including at least 10 short-stay/visitor spaces) 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 the development, 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, policy T1 of the Camden Local Plan Submission Draft 2016 and table 6.3 of the London Plan 2016.

- 22 No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the Local Planning Authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works.

If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include:

A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works.

B. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.

The written scheme of investigation will need to be prepared and implemented by a suitably professionally accredited heritage practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London.

Reason: Built heritage assets on this site will be affected by the development. The planning authority wishes to secure building recording in line with NPPF, and publication of results, in accordance with Section 12 of the NPPF and in order to ensure the identification of and minimise damage to important archaeological remains which may exist on this site, in accordance with the requirements of policy CS14 of the London Borough of Camden Local Development Framework Core Strategy, policy DP25 of the London Borough of Camden Local Development Framework Development Policies and policy D2 of the Camden Local Plan Submission Draft 2016.

- 23 Prior to implementation, detailed plans showing the location and extent of photovoltaic cells to be installed on the building shall have been submitted to and approved by the Local Planning Authority in writing. The measures shall include the installation of a meter to monitor the energy output from the approved renewable energy systems. The cells shall be installed in full accordance with the details approved by the Local Planning Authority and permanently retained and maintained thereafter.

Reason: To ensure the development provides adequate on-site renewable energy facilities in accordance with the requirements of policy CS13 of the London Borough of Camden Local Development Framework Core Strategy, policy DP22 of the London Borough of Camden Local Development Framework Development Policies and policies CC1 and CC2 of the Camden Local Plan Submission Draft 2016.

- 24 Details of integrated bird and bat nesting boxes or bricks shall be submitted to and approved in writing by the Local Planning Authority prior to any superstructure works commencing on site. Details shall include the exact location, height, aspect, specification and indication of species to be accommodated. Boxes shall be installed in accordance with the approved plans prior to the first occupation of the development and thereafter maintained. Guidance on biodiversity enhancements including artificial nesting and roosting sites is available in the Camden Biodiversity Action Plan: Advice Note on Landscaping Schemes and Species Features.

Reason: To ensure the development provides the appropriate provision towards creation of habitats and valuable areas for biodiversity in accordance with policy 7.19 of the London Plan 2016, policy CS15 of the London Borough of Camden Local Development Framework Core Strategy and policy A3 of the Camden Local Plan Submission Draft 2016.

- 25 The development hereby approved shall achieve a maximum internal water use of 105litres/person/day, allowing 5 litres/person/day for external water use. Prior to occupation, evidence demonstrating that this has been achieved shall be submitted and approved by the Local Planning Authority.

Reason: To ensure the development contributes to minimising the need for further water infrastructure in an area of water stress in accordance with policy CS13 of the London Borough of Camden Local Development Framework Core Strategy, policies

DP22 and DP23 of the London Borough of Camden Local Development Framework Development Policies and policies CC1, CC2 and CC3 of the Camden Local Plan Submission Draft 2016.

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

Reason: To safeguard existing below ground public utility infrastructure and controlled waters in accordance with the requirements of policy CS13 of the London Borough of Camden Local Development Framework Core Strategy and policies CC1, CC2 and CC3 of the Camden Local Plan Submission Draft 2016.

- 27 Prior to the first occupation of the development a plan showing details of the green/brown roofs including species, planting density, substrate and a section at scale 1:20 showing that adequate depth is available in terms of the construction and long term viability of the green roof, and a programme for a scheme of maintenance shall be submitted to and approved in writing by the local planning authority. The green roof shall be fully provided in accordance with the approved details prior to first occupation and thereafter retained and maintained in accordance with the approved scheme of maintenance.

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, policies DP22, DP23 and DP32 of the London Borough of Camden Local Development Framework Development Policies and policies CC1, CC2 and CC3 of the Camden Local Plan Submission Draft 2016.

- 28 All units hereby approved shall be designed and constructed in accordance with Building Regulations Part M4 (2) with at least 10% designed and constructed in accordance with Building Regulations Part M4 (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, policy DP6 of the London Borough of Camden Local Development Framework Development Policies and H 6 of the Camden Local Plan Submission Draft 2016.

- 29 All non-Road mobile Machinery (any mobile machine, item of transportable industrial equipment, or vehicle - with or without bodywork) of net power between 37kW and 560kW used on the site for the entirety of the [demolition and/construction] phase of the development hereby approved shall be required to meet Stage IIIA of EU Directive 97/68/EC. The site shall be registered on the NRMM register for the [demolition and/construction] phase of the development.

Reason: To safeguard the amenities of the adjoining occupiers, the area generally and contribution of developments to the air quality of the borough in accordance with the requirements of policies CS5 (Managing the impact of growth and development) and CS16 (Improving Camden's health and wellbeing) of the London Borough of Camden Local Development Framework Core Strategy, policies DP32 (Air quality and Camden's Clear Zone) and D P22 (Promoting sustainable design and construction) of the London Borough of Camden Local Development Framework Development Policies and policies CC1, CC2 and CC4 of the Camden Local Plan Submission Draft 2016.

- 30 The windows annotated as 'translucent glazing to avoid overlooking' on the north west elevation of Building 1 (as shown on drawing no. C645_B1_E_NW_001 Rev E) shall be implemented as obscurely glazed and be non-openable below a height of 1.7m and remain so in perpetuity. Details of the translucent glazing shall be submitted to and approved by the Council prior to the occupation of the development.

Reason: To protect the amenities of future and neighbouring occupiers in accordance with the requirements of policy CS5 (Managing the impact of growth and development) of the London Borough of Camden Local Development Framework Core Strategy, policy DP26 (Managing the impact of development on occupiers and neighbour) of the London Borough of Camden Local Development Framework Development Policies and of the London Borough of Camden Local Development Framework Development Policies and policy A1 of the Camden Local Plan Submission Draft 2016.

- 31 All external doorways, except for fire doors or for access to utilities, should not open outwards towards the public highway/footway/pedestrian route through the site. The proposed doors must either open inwards or have a sliding door so they do not restrict the flow of pedestrians or risk being opened onto those passing by.

Reason: In order to enhance the free flow of pedestrian movement and promote highway safety and amenity in accordance with policies CS5 of the London Borough of Camden Local Development Framework Core Strategy, policies DP21 and DP24 of the London Borough of Camden Local Development Framework Development Policies and policies D1 and T1 of the of the Camden Local Plan Submission Draft 2016.

- 32 Prior to commencement of development (other than site clearance and preparation, relocation of services, utilities and public infrastructure and demolition), full details of the overheating assessment (following the methodology set out in the Greater London Authority's Guidance on Preparing Energy Assessments) for the supported living units should be provided. The applicant should demonstrate that the Mayor's cooling hierarchy has been followed and that overheating risk has been reduced as far as possible. Where active cooling is required, details demonstrating the efficiency of the system should be provided to the Council.

Reason: To ensure the development contributes to minimising the effects of, and can adapt to a changing climate in accordance with policies CS13 of the London Borough of Camden Local Development Framework Core Strategy, policy DP22 of the London Borough of Camden Local Development Framework Development Policies and policy

CC2 of the of the Camden Local Plan Submission Draft 2016.

- 33 Notwithstanding the approved drawings and documents, no comfort cooling is permitted in any of the residential units unless it is demonstrated to the Council's satisfaction that the applicable rooms fail the overheating criteria as set out in the Greater London Authority's Guidance on Preparing Energy Assessments.

Reason: To ensure the development contributes to minimising the effects of, and can adapt to a changing climate in accordance with policies CS13 of the London Borough of Camden Local Development Framework Core Strategy, policy DP22 of the London Borough of Camden Local Development Framework Development Policies and policy CC2 of the Camden Local Plan Submission Draft 2016.

- 34 Prior to the commencement of development (other than site clearance and preparation, relocation of services, utilities and public infrastructure and demolition), full details of the mechanical ventilation including air inlet locations shall be submitted to and approved by the local planning authority in writing. Air inlet locations should be located away from roads and the Combined Heat and Power (CHP) and boiler stack to protect internal air quality.

Reason: To safeguard the amenities of the future occupiers, adjoining premises and the area generally in accordance with the requirements of policies CS5 and CS7 of the London Borough of Camden Local Development Framework Core Strategy, policies DP12, DP26 and DP28 of the London Borough of Camden Local Development Framework Development Policies and policies A1, A4 and policy CC4 of the Camden Local Plan Submission Draft 2016.

- 35 No development shall take place (other than site clearance and preparation, relocation of services, utilities and public infrastructure and demolition), until full details of air quality monitors have been submitted to and approved by the local planning authority in writing. Such details shall include the location, number and specification of the monitors, including evidence of the fact that they have been installed in line with guidance outlined in the Greater London Authority's Control of Dust and Emissions during Construction and Demolition Supplementary Planning Guidance and have been in place for 3 months prior to the proposed implementation date. The monitors shall be retained and maintained on site for the duration of the development in accordance with the details thus approved.

Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies CS5 and CS16 of the London Borough of Camden Local Development Framework Core Strategy, policy DP32 of the London Borough of Camden Local Development Framework Development Policies and policy CC4 of the Camden Local Plan Submission Draft 2016.

- 36 Prior to commencement of the development (other than site clearance and preparation, relocation of services, utilities and public infrastructure and demolition), full details of the sustainable drainage system including:

- Permeable paving (40.7m³ attenuation)
- Attenuation tank (111.4m³ attenuation)

- Green and brown roofs

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 40% provision for climate change, such that flooding does not occur in any part of a building or in any utility plant susceptible to water, and shall demonstrate a 50% reduction in run off rate in all storm events up to and including the 1 in 100 year storm. Details shall include a lifetime maintenance plan, and shall thereafter 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, policies DP22, DP23 and DP32 of the London Borough of Camden Local Development Framework Development Policies and policies CC1, CC2 and CC3 of the Camden Local Plan Submission Draft 2016.

- 37 Prior to occupation, 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 Planning 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, policies DP22, DP23 and DP32 of the London Borough of Camden Local Development Framework Development Policies and and policies CC1, CC2 and CC3 of the Camden Local Plan Submission Draft 2016.

Informative(s):

- 1 The Inspector's report on the Local Plan was published on 15 May 2017 and concludes that the plan is 'sound' subject to modifications being made to the Plan. While the determination of planning applications should continue to be made in accordance with the existing development plan until formal adoption, substantial weight may now be attached to the relevant policies of the emerging plan as a material consideration following publication of the Inspector's report, subject to any relevant recommended modifications in the Inspector's report.
- 2 You are advised that this proposal will be liable for the Mayor of London's Community Infrastructure Levy (CIL) and the Camden CIL as the additional floorspace exceeds 100sqm GIA or one unit of residential accommodation. The liable amount will be calculated on the receipt of the CIL Additional Information Requirement Form. Both CIL's will be collected by Camden after the scheme has started and could be subject to surcharges for failure to assume liability or submit a commencement notice PRIOR to commencement and/or for late payment. We will issue a formal liability notice once the liable party has been established. CIL payments will also be subject to indexation in line with the construction costs index.

- 3 You are advised that the Transport Strategy Team should be consulted regarding the construction of the crossover on the public highway and any other work to, under, or over, the public highway, including vaults and thresholds. tel: 020-7974 5543 for further advice and information.
- 4 This consent is without prejudice to, and shall not be construed as derogating from, any of the rights, powers, and duties of the Council pursuant to any of its statutory functions or in any other capacity and, in particular, shall not restrict the Council from exercising any of its powers or duties under the Highways Act 1980 (as amended). In particular your attention is drawn to the need to obtain permission for any part of the structure which overhangs the public highway (including footway). Permission should be sought from the Council's Engineering Service Network Management Team, Town Hall, Argyle Street WC1H 8EQ, (tel: 020 7974 2410) or email highwayengineering@camden.gov.uk.
- 5 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).
- 6 Your proposals may be subject to control under the Party Wall etc Act 1996 which covers party wall matters, boundary walls and excavations near neighbouring buildings. You are advised to consult a suitably qualified and experienced Building Engineer.
- 7 This site is within an area of archaeological significance/archaeological potential where development is likely to result in the destruction of ancient remains. Your attention is drawn to the British Archaeologists and Developers Liaison Group Code of Practice agreed by the British Property Federation and the Standing Conference of Archaeological Unit Managers. The Council recognises and endorses this Code and will expect the developer and approved archaeological organisations to abide by its provisions.
- 8 You are advised that the appropriate standards for tree work are set out in BS 3998: 2010. Failure to ensure that the proposed works are carried out to these standards may result in damage to the tree(s) and may result in legal action by the Council.
- 9 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 Noise and Licensing Enforcement Team, Camden Town Hall, Argyle Street, WC1H 8EQ (Tel. No. 020 7974 4444 or on the website <http://www.camden.gov.uk/ccm/content/contacts/council-contacts/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.

- 10 You are advised that the condition restricting the hours of use of the community cafe means that no customers shall be on the premises and no noise generating activities associated with the use, including preparation and clearing up, shall be carried out otherwise than within the permitted time.
- 11 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.
- 12 You are reminded of the need to provide adequate space for internal and external storage for waste and recyclables. For further information contact Council's Environment Services (Waste) on 0 20 7974 6914/5 or see the website <http://www.camden.gov.uk/ccm/content/environment/waste-and-recycling/twocolumn/new-recycling-rubbish-and-reuse-guide.en>.
- 13 With regard to conditions relating to contaminated land, the preliminary risk assessment is required in accordance with CLR11 model procedures for management of contaminated land and must include an appropriate scheme of investigation with a schedule of work detailing the proposed sampling and analysis strategy. You are advised that the London Borough of Camden offer an Enhanced Environmental Information Review available from the Contaminated Land Officer (who has access to the Council's historical land use data) on 020 7974 4444, or by email, <http://www.camden.gov.uk/ccm/content/contacts/council-contacts/environment/contact-the-contaminated-land-officer.en>, and that this information can form the basis of a preliminary risk assessment. Further information is also available on the Council's Contaminated Land web pages at <http://www.camden.gov.uk/ccm/navigation/environment/pollution/contaminated-land/>, or from the Environment Agency at www.environment-agency.gov.uk.
- 14 You are advised that Section 44 of the Deregulation Act 2015 [which amended the Greater London Council (General Powers) Act 1973]] only permits short term letting of residential premises in London for up to 90 days per calendar year. The person who provides the accommodation must be liable for council tax in respect of the premises, ensuring that the relaxation applies to residential, and not commercial, premises.
- 15 A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing wwqriskmanagement@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk/wastewaterquality.


**Appendix 1 – BPS Independent Viability Review dated
17/01/2017**

19-37 Highgate Road and 19
Greenwood Place, NW5 1LB

Independent Viability Review

Prepared on behalf of the London Borough of
Camden

17th January 2017

 **BPS**
Chartered Surveyors

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1.0 INTRODUCTION

1.1 BPS Chartered Surveyors have been instructed by the London Borough of Camden ('the Council') to review a Financial Viability Assessment ('FVA') that has been prepared by Allsops on behalf of the Applicant, Fortnum Developments Limited. This FVA relates to a proposed development at 19-37 Highgate Road & 19 Greenwood Place, NW5 1LB ('the Site'). The proposed development is detailed below:

“Demolition of existing buildings and redevelopment of the site to provide two basement levels for Class B8 (self-storage) use and two buildings above ground; Building 1 over ground, first - fifth and part sixth floors for Class B8 (self-storage), Class B1 (office) and Class C3 (residential) uses; Building 2 over ground, first - fourth and part fifth floors for Class A3 (café) and Class C3 (residential) uses; creation of a pedestrian walk-way running east-west between Buildings 1 and 2 linking Highgate Road with Greenwood Place, creation of vehicular access from Greenwood Place and loading bay adjacent to Greenwood Place, provision of green/brown roofs and plant.”

1.2 In order to complete our review, we have had reference to, among other, the following documents:

- Financial Viability Assessment (September 2016) compiled by Allsops LLP and all Appendices
- Design & Access Statement (September 2016) compiled by Squire & Partners
- Planning Statement (September 2016) compiled by Jon Dingle
- JLL Internal Valuation Report (May 2016) of the self-storage units and ancillary offices within the proposed scheme
- Accommodation Schedule by Squire & Partners
- Feasibility Construction Cost Report (September 2016) by Beadsmans

1.3 The Site is located approximately 0.2 miles from Kentish Town Underground Station. It is bounded by Highgate Road to the east and Greenwood Place to the north and west. Vehicle access to the site is via Greenwood Place. The southern part of the site shares a boundary with the Christ Apostolic Church at 23 Highgate Road. The Greenwood Centre at 25-27 Greenwood Place lies to the west of the Site, and is owned and operated by the Council. It was used for a number of years as a training centre but is now half occupied by the Camden Society and Camden People First. The walkway running between buildings 1 and 2 of the proposed scheme will improve access to the Greenwood Centre and allow it to be visible from Highgate Road.

1.4 The front (i.e. eastern) section of the Site is owned by the Council and has the benefit of extant planning permission (ref: 2013/5947/P) for a new Centre for Independent Living and a 7-storey mixed-use scheme with 42 flats (8 x affordable housing units, representing 19% on a per unit basis) and 100 sq m of social enterprise space (A1/A3/B1/D1). The current application proposes an uplift in residential units to 60 units in total, but only 8 affordable units have been offered, in line with the number consented in the extant planning permission for a smaller scheme. The affordable housing contribution has therefore decreased to 13% on a per unit basis.

- 1.5 The rear (i.e. western section) of the Site is owned by the applicant and currently comprises offices and a self-storage unit used by A&A Self Storage. The storage facility, also known as Lensham House, is a two-storey warehouse and the offices are part of the building's ancillary space.
- 1.6 There is a development agreement on the Site between the Applicant and the Council that requires the Applicant to pay £10m for the Council's land and to deliver approximately 13% affordable housing by unit. The agreement also incorporates a sales revenue overage which is applicable to the private residential sales, such that the Applicant is required to pay 50% of all uplift in sales receipts to the Council as an overage payment on any uplift over £850 per sq ft. Allsop have estimated this at an overage payment of approximately £1.91m (based on their assumed present day sales price of £930 per sq ft). Finally, the development provides the Council with a new community café (providing employment and training space for the Greenwood Centre) and Assisted Living Units.
- 1.7 Allsop conclude that the scheme has a £4,571,000 deficit. This appraisal includes a £10.0m land payment and a predicted overage payment to the vendor of £1.91m. Allsop consequently conclude that the development cannot provide any additional affordable housing contributions. The scheme is in deficit largely as a result of the substantial land payment required to be made to the Council, as well as the "payments in kind" in the form of provision of a café and assisted living units at a peppercorn (i.e. at nil consideration).
- 1.8 This Viability Review does not constitute a 'Red Book' valuation, meaning that Valuation Practice Statements 1-4 of the Red Book (RICS Valuation - Professional Standards, January 2014) are not of mandatory application. The Valuation Date for this Viability Review is the date of this report, as stated on the title page. This Viability Review has been undertaken in accordance with the Terms & Conditions provided to the Council and with any associated Letters of Engagement, and should only be viewed by those parties that have been authorised to do so by the Council.

2.0 CONCLUSIONS & RECOMMENDATIONS

- 2.1 In order to be policy compliant (according to policy CPG2), the proposed scheme would need to provide 50% of its residential floorspace as affordable housing. The current offer of 13% of all units - which is 11% of the floorspace GIA) - therefore falls 39% short of this target.
- 2.2 Whilst the 13% affordable housing delivery by unit falls short of the target of 50%, this housing is being delivered *at nil value* to the developer, as these units will be commuted for nil consideration to the Council. This represents a considerably larger cost to the developer (in terms of income forgone) than typical affordable housing delivery wherein revenues are received from Registered Providers which purchase these units.
- 2.3 Allsop conclude that given the £4.57m deficit the development cannot viably contribute a policy compliant level of affordable housing. We observe that this deficit is mostly due to the substantial costs within the development agreement between the Applicant and the Council, and the provision of the café and 8 Assisted Living Units. The applicant has agreed to pay the Council £10.0m for its part of the site, a cost second only to the cost of construction and thus a significant burden on the scheme. Additionally, based on present day sales values, the overage payment to the Council would be £1.9m.
- 2.4 We have reviewed the cost and values that are applied in the appraisal, and suggest that the proposed scheme's office values and its build costs should be amended. Given that these offices will be new-build and in proximity to Kentish Town Train Station, we conclude that Allsop's capitalisation rate of 6% may be somewhat pessimistic, and recommend adjusting the yield to 5.0-5.5%. Even after these amendments, the scheme cannot currently afford any additional affordable housing contributions. However, given the potential popularity of the scheme we would recommend a post-construction review of viability. This would use actual costs and values to give a clearer idea of the scheme's ability to make further affordable housing contributions. This review would take place once most of the units have been sold; we note that the GLA's latest Affordable Housing SPG advises that these reviews should take place once 75% of a scheme's units have been sold.
- 2.5 Given that there is an overage agreement that will deliver 50% of any uplift in revenues (over and above £931 per sq ft) as further overage payments, this would therefore substantially reduce the size of potential surpluses available for affordable housing contributions, therefore there is less potential contributions to be gained from adopting a review. Moreover, the extent of the viability deficit means that there is a relatively small chance of a surplus arising.

Benchmark Land Value - conclusions

- 2.6 Allsop conclude that the scheme has a £4,571,000 deficit. This development appraisal includes a £10.0m land payment and a predicted overage payment to the vendor of £1.91m. On this basis, it is clear that the scheme cannot afford to make any additional planning contributions.
- 2.7 By comparison, Allsop's valuation of the site leads to an estimated benchmark land value of £10.73m. This is derived from valuations of the Applicant's and Council's parts of the site at £5.98m and £4.75m land respectively.

- 2.8 Allsop state that the applicant is willing to put a nil land value on their part of the site while including the £10m land payment to the Council. This is a total land payment that is lower than the £10.73m benchmark estimate which is based on an existing use valuation of the Applicant's land and an alternative use valuation of the Council's land. We have reviewed these two valuations. The existing use value of £5.98m cited by Allsops (although they elsewhere cite £5.75m) is arrived at by capitalising an estimated rent for the existing premises. We consider the yield applied to be too low, and have increased it to 7%, which reduces the EUV to £5,660,000, although it is arguably reasonable to then add a 15% landowner premium to our revised EUV, which would give a total of £6.86m. This leads us to our revised benchmark of £10.4m, which is still higher than the £10.0m included in the appraisal.
- 2.9 The appraisal includes a £1.9m overage payment that is triggered by the estimated present day sales values, as the triggered point is a low sales rate of £850 per sqft. This is effectively a form of land payment therefore it could be argued that Allsop's appraisal incorporates an £11.9m land payment. Whilst this is higher than our revised benchmark of £10.4m, the difference is not substantial enough to render the scheme viable, given that the deficit is £4.75m.

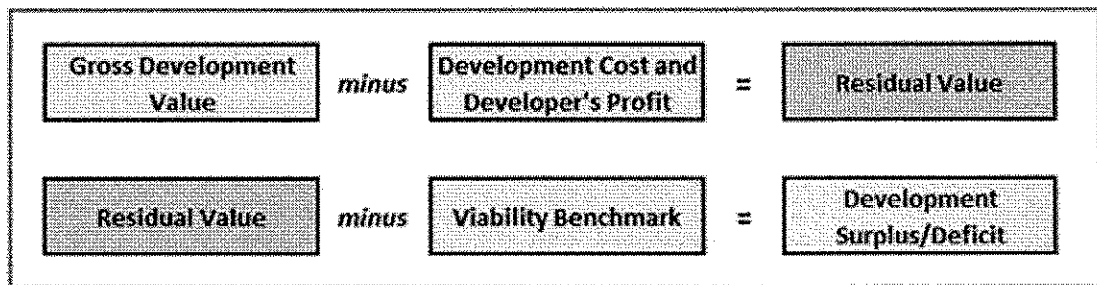
Proposed scheme values & build costs

- 2.10 We are satisfied with Allsop's adopted residential values for the proposed scheme and JLL's values assigned to the storage unit. However, regarding the proposed offices, we believe that Allsop's adopted 6% capitalisation rate is pessimistic and recommend an adjustment to 5-5.5%.
- 2.11 Allsop's Financial Viability Assessment included an elemental cost estimate by Beadmans (September 2016) that we have passed onto our Cost Consultant, Neil Powling, for assessment. His full report can be found in Appendix 3. He has made comparisons with BCIS average tender prices, and his benchmarking of the storage and office section yields an adjusted benchmark of £[REDACTED]/m² that compares to the Applicants £[REDACTED]/m² and of the residential and café section an adjusted benchmark of £2[REDACTED]/m² that compares to the Applicants £[REDACTED]/m². He therefore concludes that the applicant's costs are reasonable. However, the cost in the appraisal is higher than the cost plan by £536,960.
- 2.12 Reducing the yield to 5.0% would add £1.7m to the office values, which would be insufficient to eliminate the entire viability deficit, even allowing for the above reduction of £536,960 to the build costs (with reductions to finance costs and build cost associated cost items).

3.0 BENCHMARK LAND VALUE

Principles of Viability Benchmarking

- 3.1 Assessment of viability for planning purposes is based on the principle that if the 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.”
- 3.2 Development appraisals work to derive a residual value. This approach can be represented by the formula below:



- 3.3 The residual value is then compared to a benchmark land value. Existing Use Value (EUV) and Alternative Use Value (AUV) are standard recognised approaches for establishing a land value as they help highlight the apparent differences between the values of the site without the benefit of the consent sought.
- 3.4 The rationale for comparing the scheme residual value with an appropriate benchmark is to identify whether it can generate sufficient money to pay a realistic price for the land whilst providing a normal level of profit for the developer. In the event that the scheme shows a deficit when compared to the benchmark figure the scheme is said to be in deficit and as such would be unlikely to proceed. Regarding this development there is an unviable deficit even when the benchmark land value is zero.

Benchmarking conclusions

- 3.5 The Site currently houses two buildings: the Highgate Centre at 19-37 Highgate Road, and the former Lensham House, now A&A Self-Storage, at 19 Greenwood Place. The back of the site, containing the storage units, is owned by the applicant and has no extant planning permission, whilst the Council-owned part of the site already has planning consent for a mixed-use development. The former has been valued according to an EUV and the latter an AUV-based appraisal.
- 3.6 Allsop have estimated £5,980,000 for the Applicant's land and £4,750,000 for the Council-owned half of the Site. Our adjustments revise the value of the Applicant's land to £5,660,000, but we have not revised the valuation of the Council's land. This results in a marginal decrease in the benchmark land value to £10.4m.

EUV - applicant's building

- 3.7 Allsop's EUV estimate is £5,980,000. They have valued the existing 2,100 sq m (22,604 sq ft) B8 storage unit as £13 per sq ft, a marginal reduction to the value of the new build storage in the proposed scheme (valued by JLL at £14.50 per sq ft). This is a rent per annum of £293,850. We have not been provided with Allsop's research however their adjustments to rental values per square foot appear reasonable given the condition of the unit.
- 3.8 JLL have applied a 6.75% capitalisation rate to the proposed storage facility, therefore it seems unjustified to award a superior 6.5% yield to the tired existing units. Given the proposed units are new build, we would apply a more pessimistic yield to the existing units of 7%.
- 3.9 There is also 748 sqm (8,051 sq ft) of extant ancillary B1 office space on-site, which has been valued at £15 per sq ft (£120,765 per annum). From the A&A Storage website we have discovered that these offices are in marketable condition, fully serviced, cleaned twice a week, and have a 24-hour electronic entry system and CCTV monitoring. We are of the opinion that this rate is therefore reasonable, in the context of JLL's report for the proposed.

The total rent for the extant buildings on the Applicant's side of the site is therefore £414,615 per annum. This has been capitalised with a yield of 6.5% to make £6,378,000, which after a 6.64% reduction for purchaser's costs gives a net value of £5,980,000. However, as aforementioned, we do not believe that the storage units should be achieving a superior yield to their new-build, proposed counterparts. We have therefore increased this yield to 7%. The new EUV for the Applicant's site is therefore £5,662,181, rounded to £5,660,000.

- 3.10 No landowner's premium appears to have been applied to this benchmark. The NPPF recognises at paragraph 173 the need to provide both land owners and developers with a competitive return, to encourage landowners to release land for development. This has translated to the widely accepted practice when using EUV as a benchmark of including a premium typically in a range from 5% to 30%. Guidance indicates that the scale of any premium should reflect the circumstances of the specific site. We are of the view that where sites represent an ongoing liability to a land owner and the only means of either ending the liability or maximising site value is through securing a planning consent this should be a relevant factor when considering whether a premium is applicable. We have thus far followed Allsop by excluding a landowner premium, but would not consider a 15% premium to be unreasonable, which would lead to a benchmark land value of £6.86m.

AUV

- 3.11 Allsops have undertaken a residual valuation for the consented scheme on the Council's site. This generates a residual land value of £4.75m. We agree that valuing the site based off of its existing consent is a more realistic assumption of value than the valuation of the current social and community space on site, and therefore agree with an AUV method of valuation (although Allsop have named this an EUV).

- 3.12 The extant planning permission permits the demolition of Highgate Day Centre and the construction of a part 5, part 7 storey development comprising 42 residential units (including 8 ALU's) and 100 sqm of nil-value social enterprise space at the ground floor. Allsop's appraisal leads to a value of £4,750,000. Allsop have made the following assumptions:

| | |
|-------------------------------|---------------------------------------|
| Private residential value | £22,431,600 |
| Affordable housing value | £0 |
| Social enterprise space value | £0 |
| Ground rent | 34 x £350 per annum capitalised at 5% |
| Build cost | £226 per sq ft |
| Contingency | 5% |
| Professional fees | 10% |
| Sales fees | 2% |
| Marketing | £100,000 |
| Finance | 60/40 debt to equity at 6.5% |
| MCIL | £795,000 |
| S106 | £2,600,000 |
| SDLT | 5% |
| Profit | 20% on Cost |

- 3.13 The private residential units have been entered into the appraisal as a lump sum of £22,431,600, translating to a rate of £930 per sq ft, and Allsop have not provided a unit-by-unit breakdown of values. The 34 private units consist of 10 x 1 beds, 21 x 2 beds, 3 x 3 beds.
- 3.14 Allsops have applied the £psf for each unit type of the proposed scheme's residential units to the consented scheme, assuming specification etc. will be similar. This is £964 per sq ft to 1 bedroom units, £886 psf to 2 bedroom units, and £1,037 psf to 3 bedroom units, using average sizes found in online planning documents. We agree with this methodology and therefore conclude that £22,431,000 for the consented scheme is reasonable. We are therefore of the opinion that Allsop's £4.75m valuation of the Council's land is reasonable.

4.0 PROPOSED COMMERCIAL VALUESOffices

- 4.1 The second and third floors of the proposed scheme will consist of 1,324sqm NIA office space (1,803sqm GIA). Allsop have assigned a value of £42.50psft to these units based off of the following comparable evidence:

| Address | Lease details | Notes |
|--|---|---|
| Highgate Studios, 53-79 Highgate Road, NW5 | £38.50psf Dec-15 5 year lease (breaks in 2018) | Fully let office block with ground floor retail (restaurant) providing a beneficial amenity for staff. The conversion from light industrial was completed in 2001, and was refurbished in 2013. Shorter lease than would be expected. |
| Ryland House, 24 Ryland Road, NW5 | £45psf Asking rent | Total 10,000 sq ft offices with 4 residential penthouses on the third floor. Property hence sold earlier this year with 'residential potential'. |
| Imperial Works, Perren Street, NW5 | £45psf for 18,000sqft Dec-15 10 year lease (breaks in 2020) | Office space that is currently being extended. An application was recently refused for change of use to 14 private residential units. This unit is multi-let, which will mean smaller floorplates per business and correspondingly higher £psf. |
| The Studios, Hornsey Street, N7 | £34.90psf Mar-15 (old comp) 5 year lease Other leases in Mar-15 achieved £36.32psf-£43.63psf | Large mixed use office/ residential block with retail and leisure on the ground floor. |
| 32 Jamestown Road, NW1 | £50psf (average) No details re: size Assume Grade A | New build, in a better location. |

- 4.2 Given the above comparable evidence and the secondary location of the subject for offices we find the rental value assigned to the proposed offices to be reasonable.
- 4.3 A yield of 6% has been found by Allsop both through comparables and conversations with local agents.
- 4.4 We have analysed Allsop's investment comparables, only one of which included yield information. This yield was achieved in July 2014 at 35-37 Kentish Town Road, NW5 and is therefore outdated. This comparable also benefited from redevelopment potential, and was larger in terms of square footage than the subject. We therefore discounted this comparable.
- 4.5 As the remaining comparables did not contain any yield details we have undertaken our own research of the Camden office market, and this research is available in Appendix 1. We have taken note of the advice given to Allsop by local letting agents and attempted to find comparables that, like the subject, would benefit from single occupation (or two smaller occupiers) that are looking for headquarter premises.

- 4.6 We acknowledge that the majority of our comparables are in superior locations to the subject. Nonetheless, given the new-build nature of these offices and their proximity to Kentish Town Train Station, we conclude that a capitalisation rate of 6% is pessimistic. All things considered we recommend adjusting the yield to 5.0-5.5%.

The Basement

- 4.7 The development also involves the construction of a two-level basement that will contain 4,052sqm self-storage (Use Class B8). The applicant intends to occupy this space, running the A&A Self-Storage business currently being operated from the rear of the existing site. Relocation fees for the business do not appear to have been factored into the appraisal.
- 4.8 The basement storage space has been valued at £9,870,000 by Jones Lang LaSalle's ('JLL') specialist storage valuation team. JLL conclude that an operator with a good covenant, on an FRI lease, could expect to pay a rent of £14.50psft per annum. Applied to the subject, this would mean a rental value of £785,160 per annum. JLL have then capitalised this rent with an all-risks yield of 6.75%, assuming 18 months rent-free incentive and 6.8% purchaser's costs. Fit out costs have been set at £50psft. This provides a capital value of £9.87m for the storage units (£212psft GIA).
- 4.9 JLL's comparable evidence is fairly ambiguous. One comparable in North London has no specific address or area, just a quoted £12.50psf rate. This comparable is a self-storage container sold in 2016. Without notion of size or specification this comparable has limited usefulness. The other comparable used for rental values is Fort Box, St John's Wood. Again no specification details are given, but the signing of a 25-year lease suggests that the quality of the unit is good. We therefore consider this to be the upper-bracket of rents for self-storage units. This transaction achieved a 6.5% yield, helped by its long-leased tenant. We therefore agree that a marginally inferior yield of 6.75% for the subject units - assumed to be on 10-year leases - is suitable.
- 4.10 Given the sparsity of useful comparables we have sense-checked the assigned values by JLL with our own research. The local market, despite being competitive, is sparse in terms of property to buy or to rent for self-storage purposes. We have therefore sought large industrial units with self-storage potential, acknowledging that these comparables will be inferior to purpose-built storage units.

| Address | Asking rent | Notes |
|--|-----------------------------------|--|
| The Left Hand Car Drive Centre, 176-178 York Way, N1 | £165,000pa (£14psf) 12,135sqft | General industrial space, second-hand Grade B, advertised with 3 year lease. Subject will be far superior. |
| Unit 4, Station Road, N19 | £83,000pa (£10psf) 8,000sqft | Mixed industrial space (B1, B2, B8), second-hand Grade B, close to Tufnell Park Underground Station, includes a large ancillary warehouse and two floors of offices. Subject superior. |

Café

- 4.11 The first floor of the Greenwood Centre will consist of a 100sqm NIA café (A3). The café will be handed back to the Council at nil value on a 125-year lease and will be utilised by the occupants of the Greenwood Centre. As the café is an ancillary element of the Greenwood Centre we are satisfied to consider it at nil value.

5.0 PRIVATE RESIDENTIAL VALUES

- 5.1 The proposed development consists of 4,437 sqm (47,759 sqft) NIA residential space (52 units) spanning the first to eighth floors across both buildings on the development site. The GDV for the private residential units according to Allsop is £44,415,000 (£930psf).
- 5.2 The private units have been divided into 16 x 1 bedroom apartments, 29 x 2 bedroom apartments, and 7 x 3 bedroom apartments. These have been valued on average at £964, £886, and £1,037psf respectively by Allsop. Market comparables and our own knowledge of the local market give us the impression that these values are reasonable.
- 5.3 The 6,444sqm residential GIA means that these units have an efficiency rating of only 69%. This is relatively inefficient for residential units. This is likely down to design but we recommend care is taken to ensure that the buildings are as efficient as possible.
- 5.4 Any open market sales that achieve above £850psft are subject to an overage payment of 50% to the Council from the Applicant. Allsop estimate this will cost them £1.91m. We expect that the units will be as popular if not more so than Allsop's valuations and therefore this overage payment stands as a significant cost to the Applicant. Allsop's values have been derived from the following evidence:

| Address | Description | Average values £psf |
|--|---|---|
| The Town Apartments, NW5 | This development is significantly smaller than the subject, containing just 15 x 1-3 bed apartments. Each apartment comes with a private balcony. | 1 bed - £786-£795 2 bed - £717-£800 3 bed - £716-£807 |
| X&Y Apartments, Maiden Lane, NW1 | This is a much larger scheme totalling 265 units, 47% of which were offered as affordable housing. The units offer good views of the city. The development also features a tower block with superior views that will increase the overall average £psf. | 1 bed - £940-£1,117 2 bed - £919-£1,058 3 bed - £900 |
| Randolph Apartments, NW1 | Simple Manhattan, studio, and 1-bed collection of apartments excellently located to the tube station. The scheme sold out over a year ago, in Q2 2015, before its completion in Q3 2015. The apartments are smaller than the subject, so the £psf information is not especially useful. | 1 bed - £1,179-£1,242 |
| The Maple Building (Linton House), NW5 | A development of 50 apartments and 7 penthouses, all 1-3 bedrooms with high internal specification. Due for completion Summer 2016. Residents benefit from a 24-hour concierge and security service, and a gym (public). The development is a converted warehouse building | 1 bed - unavailable 2 bed - £1,120 3 bed - £1,160 |

| | | |
|--|---|--|
| | with penthouses as an extension. Limited information can be found. The scheme launched in February 2016 but as of March 2016, no properties were under offer. By April 2016, 10 offers had been made, all below asking price. Would be a highly comparable property should achieved sales information be found. | |
|--|---|--|

- 5.5 Of all of the comparables provided, units were smaller than the subject, which will impress higher values per square foot than might be justified. However care appears to have been taken to ensure values are considerate of the superior size of the subject units.

Ground rent

- 4.1 Ground rental income has been assumed at a rate of £350 per private unit per annum and has been capitalised at a yield of 5% to equate to a total of £363,183. We consider this to be in line with market evidence and assume the £350 per unit reflects a generic sum across all units for valuation purposes but reflects stepped rental levels according to unit size.

6.0 AFFORDABLE HOUSING

- 6.1 Having assessed the proposed schemes costs and values we have not found any areas in which improvement is substantial enough to alleviate the subject development from its considerable viability deficit. We therefore conclude that no further affordable unit contributions can be made.

Camden policy

- 6.2 The application triggers a requirement that 50% of the residential floorspace should be provided as affordable housing. Camden Planning Guidance (CPG2) details that affordable housing is required on any scheme providing over 1,000 m² of net additional housing. It explains that the sliding scale will operate so that 10% affordable will be required for sites providing 1,000 m² (gross) of additional housing, and 50% for 5,000 m² (gross) of additional housing (considered to be sites with capacity for 10 dwellings and 50 dwellings respectively).

Proposed provision

- 6.3 The current affordable housing provision is by means of Assisted Living Units ('ALU's') located on the ground and first floors for ease of accessibility. The units will be linked to the Greenwood Centre for Independent Living to provide accommodation for attendees. These units translate to a 13% affordable housing offer on a per unit basis. The units will be handed over to the Council at nil value following completion, at a cost of £1,690,000 to the applicant without any revenue in return. Consequentially they have been assigned nil value in the appraisal.
- 6.4 The proposed provision of ALU's mirrors the consented scheme at the Council's site (2013/5947/P) despite the fact that the revised scheme provides for an increase in residential floorspace. The applicant claims that no further contribution can be made due to the viability of the development.

- 6.5 All of the affordable units provided will be single bedroom units. A schedule of accommodation has been provided by Allsop, below:

| Building | Unit Type | Floor | Sqm | Sq ft | Number of habitable rooms |
|----------|-----------|--------|-----|-------|---------------------------|
| 1 | 1b2p | Ground | 73 | 785 | 2 |
| 1 | 1b2p | Ground | 71 | 764 | 2 |
| 1 | 1b2p | First | 80 | 861 | 2 |
| 1 | 1b2p | First | 75 | 807 | 2 |
| 2 | 1b2p | Ground | 73 | 786 | 2 |
| 2 | 1b2p | Ground | 73 | 786 | 2 |
| 2 | 1b2p | Ground | 75 | 807 | 2 |
| 2 | 1b2p | Ground | 78 | 839 | 2 |

- 6.6 Despite not being conventional affordable housing, we have spoken with the Council that have reassured us these units are to be treated as such, for the following reasons:

[The units] will be transferred to Fortnum Ltd through the Development Agreement so there needs to be a mechanism to transfer the units to the Council. Therefore, the units will be let on a 125-year lease at peppercorn rents (not too dissimilar to a developer letting social rent units to an RP). On that basis we don't have any problem with the assisted living units being considered as affordable.

7.0 DEVELOPMENT COSTS

- 7.1 Allsop's Financial Viability Assessment included an elemental cost estimate by Beadmans (September 2016) that we have passed onto our Cost Consultant, Neil Powling, for assessment. His full report can be found in Appendix 3. He has made comparisons with BCIS average tender prices, and his benchmarking of the storage and office section yields an adjusted benchmark of £1[REDACTED]/m² that compares to the Applicants £[REDACTED]/m² and of the residential and café section an adjusted benchmark of £[REDACTED]/m² that compares to the Applicants £[REDACTED]/m². He therefore concludes that the applicant's costs are reasonable. However, the cost in the appraisal is higher than the cost plan by £[REDACTED].
- 7.2 Contingency has been added at 5% which we consider to be reasonable. We also do not dispute the 16.5% for preliminaries, for overheads and profit.
- 7.3 Professional fees at 10% are conservative because of 'work that has already been carried out to date'. We agree that these costs are conservative and also hold the opinion that they are reasonable.
- 7.4 10.5% for a commercial letting agent and legal fees, and 2% sales agent and legal fees for residential property are both in line with standard rates. A £250,000 all-encompassing marketing cost is also reasonable.
- 7.5 The estimated cost of the overage payment to the Council is £1,910,000. We predict that in reality the units might achieve marginally higher values and thus this cost is subject to increase, however this is a reasonable estimated figure. Additionally, £10,000,000 is payable to the Council to their land. These are the terms of the development agreement, which is a significant cost to the development.

- 7.6 Finance rate 6.5% assuming 40% equity and 60% debt, all of which are reasonable assumptions.

Profit

- 7.7 The Developer requires a 20% profit on cost, translating to 16.67% as a rate of GDV. The industry norm is 20% profit for open-market housing, 15% for commercial property, and 6% affordable housing on GDV. We are therefore satisfied with this modest profit rate.

Planning obligations

- 7.8 MCIL has been calculated at £450,950. Camden CIL has been calculated at £3,250,950 according to the Zone C charging schedule. We requested a breakdown of these CIL calculations from the applicant, and these show this calculation is accurate. We do however advise that CIL levels are checked by the Council.

Land acquisition

- 7.9 A fixed legal fee of £50,000 has been entered into the appraisal as opposed to a flexible rate.

BPS Chartered Surveyors

Appendices

Appendix 1 - Office investment comparables

a) **Thavies Inn House, 1-6 Holborn Circus, EC1**

This is an older style office building that has been refurbished over the years. Currently it is being multi-let. In October 2016 the property was sold for £33m reflecting a net initial yield of 4.33%. The income is reversionary with a number of rent reviews coming up in 2017. The property currently produces a rental income of around £1.5m and the sale price (long leasehold) reflects £653.00 per sq ft. This comparable is larger than the subject and in a more advantageous location.

b) **8 Gate Street, WC2**

The freehold of this 11,678 sq ft building was sold in June 2016 for £11.45m (£980psf) reflecting a net initial yield of 4.91%. The building is let in its entirety on a full repairing and ensuring lease expiring March 2021. The building having an overall rent of £51.42 per sq ft.

Additionally:

| Address | Deal Date | Size sqft | Price | Yield % | £psf |
|---|------------|-----------|-------------|---------|--------|
| 54 Hatton Garden London Inner London EC1N 8HN | 01/10/2016 | 7,502 | £7,400,000 | 4.80 | £986 |
| 8 Gate Street London Inner London WC2A 3HP | 01/06/2016 | 11,969 | £11,450,000 | 4.91 | £957 |
| 110 High Holborn London Inner London WC1V 6EU | 01/06/2016 | 109,577 | £98,550,000 | 5.29 | £899 |
| Mercury House 110-124 Theobalds Road London Inner London WC1X 8RX | 01/04/2016 | 81,106 | £65,750,000 | 4.04 | £811 |
| McCann-Erickson House 7-11 Herbrand Street London Inner London WC1N 1EX | 01/03/2016 | 66,403 | £56,000,000 | 4.73 | £843 |
| 100 Gray's Inn Road London Inner London WC1X 8AU | 01/01/2016 | 39,439 | £39,800,000 | 4.24 | £1,009 |
| 13-17 Red Lion Square London Central London WC1R 4QJ | 10/11/2015 | - | £46,500,000 | 4.75 | - |
| 43 Eagle Street London Inner London WC1R 4AP | 01/09/2015 | 10,452 | £8,750,000 | 3.58 | £837 |
| Saffron Court 14b St Cross Street London Inner London EC1N 8XA | 01/08/2015 | 12,874 | £3,180,000 | 5.25 | £247 |
| 70 New Oxford Street London Inner London WC1A 1EU | 01/05/2015 | 16,135 | £36,500,000 | 4.10 | £2,262 |
| 2 Bedford Row London Inner London WC1R 4BU | 01/03/2015 | 7,567 | £5,800,000 | 4.40 | £766 |
| 20 Red Lion Street London Inner London WC1R 4QN | 01/02/2015 | 29,385 | £19,000,000 | 5.00 | £647 |
| The Halo Building 1 Mabledon Place London Inner London WC1H 9AJ | 01/02/2015 | 80,998 | £72,500,000 | 4.70 | £895 |
| Peer House 8-14 Verulam Street London Inner London WC1X 8LZ | 01/01/2015 | 10,097 | £6,100,000 | 3.30 | £604 |

Appendix 2 - Schedule of accommodation for the consented scheme according to online planning documents

1213 Greenwood CC Rev_ 19.11.13

Gross External Area + Gross Internal Area Highgate Site

Highgate Proposed

| | GEA | GIA Aff | GIA Pri | GIA Com |
|--------------|-------------|------------|-------------|------------|
| Ground | 802 | 445 | 165 | 100 |
| First | 677 | 135 | 462 | / |
| Second | 677 | / | 603 | / |
| Third | 677 | / | 603 | / |
| Fourth | 665 | / | 591 | / |
| Fifth | 279 | / | 238 | / |
| Sixth | 248 | / | 217 | / |
| Roof | 20 | / | 10 | / |
| Total | 4045 | 580 | 2889 | 100 |

1213_Highgate Road Residential_19.11.2013_REV_E

Schedule of Accommodation and Net Internal Floor Areas

| Highgate Road Schedule of Accommodation | | | | | | | |
|---|--------------------|-----------|-----------|----------|----------|----------|-----------|
| | 1B /2P Social Rent | 1B /2P | 2B/3P | 2B/4P | 3B/4P | 3B/5P | Total |
| Ground | 6 (wheelchair) | | | | | | 0 |
| First | 2 | 1 | 4 | 1 | | | 8 |
| Second | | 3 | 2 | 3 | | | 8 |
| Third | | 3 | 2 | 3 | | | 8 |
| Fourth | | 2 | 2 | 2 | | 1 | 7 |
| Fifth | | 1 | 2 | | | | 3 |
| Sixth | | | | | 1 | 1 | 2 |
| Total | 8 | 10 | 12 | 9 | 1 | 2 | 42 |
| Percentage of 2+ Bed dwellings | | | | | | | 54.80% |

Ground Floor-Net Internal Floor Area

| Unit | Type | Area m2 |
|-------------|--------------------|---------|
| Flat A | 1B 2P (WheelChair) | 65 |
| Flat B | 1B 2P (WC) | 72.4 |
| Flat C | 1B 2P (WC) | 70.7 |
| Flat D | 1B 2P (WC) | 65.5 |
| Flat E | 1B 2P (WC) | 65.2 |
| Flat F | 1B 2P (WC) | 68.1 |
| Bike Store | | 42.8 |
| Bin Store | | 20.4 |
| Plant Room | | 32 |
| Social Ent. | | 100.2 |

First Floor-Net Internal Floor Area

| Unit | Type | Area m2 |
|--------|-------|---------|
| Flat G | 2B 4P | 70 |
| Flat H | 1B 2P | 50.3 |
| Flat J | 2B 3P | 64.5 |
| Flat K | 1B 2P | 56.2 |
| Flat L | 1B 2P | 56.4 |
| Flat M | 2B 3P | 63 |
| Flat N | 2B 3P | 60.5 |
| Flat P | 2B 3P | 63.1 |

Second & Third Floors-Net Internal Floor Area

| Unit | Type | Area m2 |
|--------|-------|---------|
| Flat R | 2B 4P | 70 |
| Flat S | 1B 2P | 50.3 |
| Flat T | 1B 2P | 51.6 |
| Flat U | 2B 4P | 79.2 |
| Flat V | 2B 4P | 78 |
| Flat W | 1B 2P | 50.3 |
| Flat X | 2B 3P | 60.5 |
| Flat Y | 2B 3P | 63.1 |

Fourth Floor-Net Internal Floor Area

| Unit | Type | Area m2 |
|---------|-------|---------|
| Flat Z | 3B 5P | 115.5 |
| Flat T1 | 1B 2P | 51.6 |
| Flat U1 | 2B 4P | 79.2 |
| Flat V1 | 2B 4P | 78 |
| Flat W1 | 1B 2P | 50.3 |
| Flat X1 | 2B 3P | 60.5 |
| Flat Y1 | 2B 3P | 63.1 |

Fifth Floor-Net Internal Floor Area

| Unit | Type | Area m2 |
|-------------------------|-------|---------|
| Flat W2 | 1B 2P | 50.3 |
| Flat X2 | 2B 3P | 60.5 |
| Flat Y2 | 2B 3P | 63.1 |
| Photovoltaics | | 86.6 |
| Shared Amenity | | 172.6 |
| Flat W2 Private Amenity | | 15.7 |

6th Floor-Net Internal Floor Area

| Unit | Type | Area m2 |
|---------------|-------|---------|
| Flat 1 | 3B 5P | 95.6 |
| Flat 2 | 3B 4P | 95.7 |
| Photovoltaics | | 45.35 |

6th Floor Roof-External Floor Areas

| | |
|------------------------|------|
| Flat 1 Private Amenity | 49.4 |
| Flat 2 Private Amenity | 47.7 |
| Photovoltaics | 57 |

Appendix 3 - Cost report and breakdown by Neil Powling DipBE FRICS DipProjMan(RICS) - PDM

Project: 19-37 Highgate Road (Highgate Centre) & 19
Greenwood Place (A&A self-storage), Camden, NW5 1LB
2016/5372/P

Independent Review of Assessment of Economic Viability

Interim Draft Report
Appendix A Cost Report

1 SUMMARY

- 1.1 The cost plan is dated 23rd September 2016. Our benchmarking uses current BCIS data which is on a current (1Q2017) tender firm price basis. The cost plan has two separate inflation adjustments: firstly to update from the base date of an earlier revision of the cost 2Q2015 to 2Q2016 and secondly from 2Q2016 to the assumed start on site 2Q2017. The cost should be a current cost, so projecting to a start in the future is incorrect, but the difference between the current TPI 1Q2017 of 288 and 2Q2017 of 289 is sufficiently small as to be immaterial in the context of this benchmark checking exercise. We have therefore treated the Applicants inflation adjusted costs as current and adjusted the element totals accordingly for benchmarking purposes.
- 1.2 There is a difference in the GIAs of the Architect's area schedule and those used by Beadman in the cost plan. The offices and storage is 6,115m² from the Architect's schedule and 6,402m² used in the cost plan. A note confirms that the AA Storage car park and loading bay off Greenwood place has been included in Beadman's figures. The Architect's total for the residential and café is 7,242m² and Beadman's 7,134m². For the purposes of our analysis and benchmarking we have used Beadman's figures.
- 1.3 The substructure to the residential section comprises a contribution from the Storage costs section of £[REDACTED] (£[REDACTED] with inflation) - £[REDACTED]/m² (£[REDACTED]/m²). The substructure of the storage and office section is £[REDACTED] with inflation (£833/m²). This transfer is insufficient and would distort the benchmarking so we have transferred a further £[REDACTED]/m² from the residential to the storage section (see the transfer at the bottom of our analysis.)
- 1.4 The Feasibility cost plan includes the items listed at 3.12 plus the additional inflation to 2Q2017 of £[REDACTED] but totals £[REDACTED]. There is therefore a discrepancy of £1,516,960 between the cost plan total and the construction costs included in the appraisal.
- 1.5 Our benchmarking of the storage and office section yields an adjusted benchmark of £[REDACTED]/m² that compares to the Applicants £[REDACTED]/m² and of the residential and café section an adjusted benchmark of £[REDACTED]/m² that compares to the Applicants £[REDACTED]/m². We are therefore satisfied that the applicants costs of the cost plan are reasonable but note the discrepancy with the construction costs in

the appraisal identified in paragraph 1.4 above and 3.13 below.

- 1.6 We note that the EUV is appraised at £■■■/ft² - the same rate as the proposal. This rate may require review for the discrepancy identified in paragraph 3.13 and also for the substructure budget transfer described in 3.9.

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's 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. A key characteristic of benchmarking is to measure performance against external data. Whilst a company may prefer to use their own internal database, the danger is that it measures the company's own projects against others of its projects with no external test. Any inherent discrepancies will not be identified without some independent scrutiny.
- 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 occasionally upper quartile for benchmarking. The outcome of the benchmarking is little affected, as BCIS levels are used as a starting point to assess the level of cost and specification enhancement in the scheme on an element by element basis. 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 available on an overall £ per sqm and for new build work on an elemental £ per sqm basis. Rehabilitation/conversion data is available on an overall £ per sqm and on a group element basis ie. substructure, superstructure, finishings, fittings and services - but is not available on an elemental basis. 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 ideally keep the estimates for different categories separate to assist more accurate benchmarking. However if the Applicant's cost plan does not distinguish different categories we may calculate a blended BCIS average rate for benchmarking based on the different constituent areas of the overall GIA.
- 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 BCIS 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 from the planning website.
- 2.9 BCIS average prices per sqm include overheads and profit (OHP) and preliminaries costs. BCIS elemental costs include OHP but not preliminaries. Nor do average prices per sqm or 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.
- 2.10 We undertake this adjusted benchmarking by determining the appropriate location adjusted BCIS average rate as a starting point for the adjustment of abnormal and enhanced costs. We review the elemental analysis of the cost plan on an element by element basis and compare the Applicants total to the BCIS element total. If there is a difference, and the information is available, we review the more detailed build-up of information considering the specification and rates to determine if the additional cost appears justified. If it is, then the calculation may be the difference between the cost plan elemental £/m² and the equivalent BCIS rate. We may also make a partial adjustment if in our opinion this is appropriate. The BCIS elemental rates are inclusive of OHP but exclude preliminaries. If the Applicant's costings add preliminaries and OHP at the end of the estimate (as most typically do) we add these to the adjustment amounts to provide a comparable figure to the Applicant's cost estimate. The results of the elemental analysis and BCIS benchmarking are generally issued as a PDF but upon request can be provided as an Excel spreadsheet.

3 GENERAL REVIEW

- 3.1 We have been provided with and relied upon the Affordable Housing & Economic Viability Assessment for Fortnum Developments Ltd issued by Allsop LLP dated 26th September 2016
- 3.2 We have also downloaded a number of files from the planning web site.
- 3.3 The cost plan is dated 23rd September 2016. Our benchmarking uses current BCIS data which is on a current (1Q2017) tender firm price basis. The cost plan has two separate inflation adjustments: firstly to update from the base date of an earlier revision of the cost 2Q2015 to 2Q2016 and secondly from 2Q2016 to the assumed start on site 2Q2017. The cost should be a current cost, so projecting to a start in the future is incorrect, but the difference between the current TPI 1Q2017 of 288 and 2Q2017 of 289 is sufficiently small as to be immaterial in the context of this benchmark checking exercise. We have therefore treated the Applicants inflation adjusted costs as current and adjusted the element totals accordingly for benchmarking purposes.
- 3.4 The cost plan includes an allowance of 16.5% for preliminaries, for overheads and profit (OHP) 5%, and for contingencies 5%; we consider all these allowances reasonable. All the % figures are based on a calculation of a conventional arrangement of the sums in the analysis.
- 3.5 There is a difference in the GIAs of the Architect's area schedule and those used by Beadman in the cost plan. The offices and storage is 6,115m² from the Architect's schedule and 6,402m² used in the cost plan. A note confirms that the AA Storage car park and loading bay off Greenwood place has been included in Beadman's figures. The Architect's total for the residential and café is 7,242m² and Beadman's 7,134m². For the purposes of our analysis and benchmarking we have used Beadman's figures.

- 3.6 We have prepared a blended rate for the storage space and offices as follows:-

| 3.7 | Blended calculation | GIA m ² £/m ² | QS GIA £/m ² | | BCIS £/m ² | Blended £/m ² |
|-----|---------------------|--|----------------------------|----------------|--------------------------|-----------------------------|
| | Self-storage | 4,312 | 4,599 | 71.84% | 1,086 | 780 |
| | Offices | 1,803 | 1,803 | 28.16% | 2,519 | 709 |
| | | <u>6,115</u> | <u>6,402</u> | <u>100.00%</u> | | <u>1,490</u> |

- 3.8 The café and residential have been combined in the Feasibility Cost Plan - the café represents 1.44% of the combined GIA for these elements; for the purposes of benchmarking we have treated all the costs of this section as 6+ storey flats.
- 3.9 The substructure to the residential section comprises a contribution from the Storage costs section of £■■■■■ (£■■■■■ with inflation) - £■■/m² (£■■/m²). The substructure of the storage and office section is £5,332,282 with inflation (£■■■/m²). This transfer is insufficient and would distort the benchmarking so we have transferred a further £■■■/m² from the residential to the storage section (see the transfer at the bottom of our analysis.)
- 3.10 The cost document includes a section on Value Engineering confirming a schedule of savings already included in the cost plan and a further schedule of savings for

future consideration.

3.11 The various construction costs have been included in the appraisal as follows:-

| | |
|------------------------|------------|
| 3.12 Construction cost | ██████████ |
| Contingency | ██████████ |
| Demolition | ██████████ |
| External works | ██████████ |
| Flood prevention | ██████████ |
| | ----- |
| Inflation to 2Q2016 | ██████████ |
| | ----- |
| Total | ██████████ |

3.13 The Feasibility cost plan includes the above items plus the additional inflation to 2Q2017 of £██████████ but totals £██████████. There is therefore a discrepancy of £██████████ between the cost plan total and the construction costs included in the appraisal.

3.14 Sales of the market flats have been included in the Appraisal at average figures of £930/ft² (Net Sales Area).

3.15 We have downloaded current BCIS data for benchmarking purposes including a Location Factor for Camden of 125 that has been applied in our benchmarking calculations.

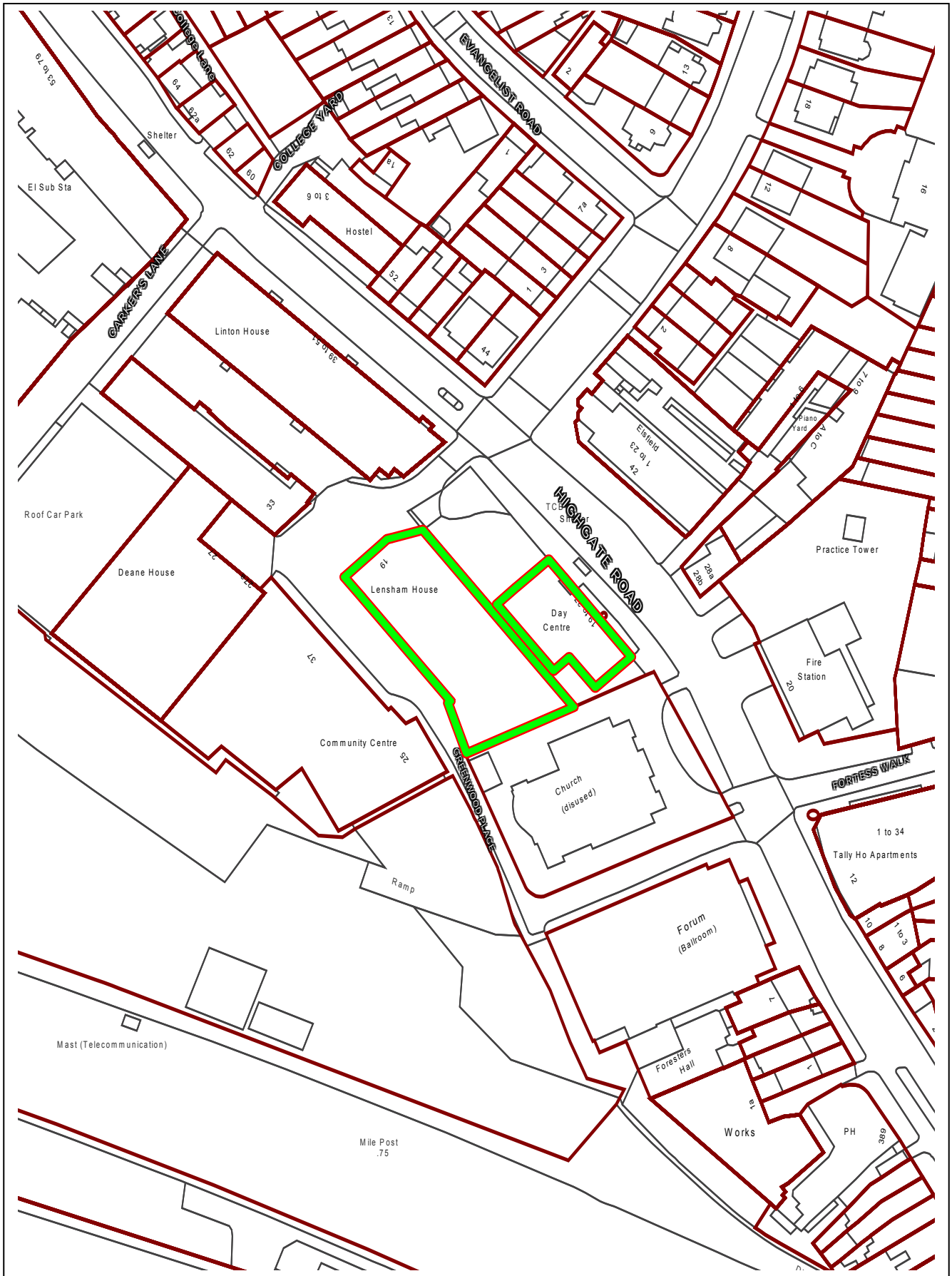
3.16 Please refer to the “Elemental analysis and BCIS benchmarking” table, below.

3.17 Our benchmarking of the storage and office section yields an adjusted benchmark of £██████████/m² that compares to the Applicants £██████████/m² and of the residential and café section an adjusted benchmark of £██████████/m² that compares to the Applicants £██████████/m². We are therefore satisfied that the applicants costs of the cost plan are reasonable but note the discrepancy with the construction costs ion the appraisal identified in paragraph 3.13 above.

3.18 We note that the EUV is appraised at £██████████/ft² - the same rate as the proposal. This rate may require review for the discrepancy identified in paragraph 3.13 and also for the substructure budget transfer described in 3.9.

BPS Chartered Surveyors
Date: 16th January 2017

[Elemental analysis and BCIS benchmarking” table redacted]

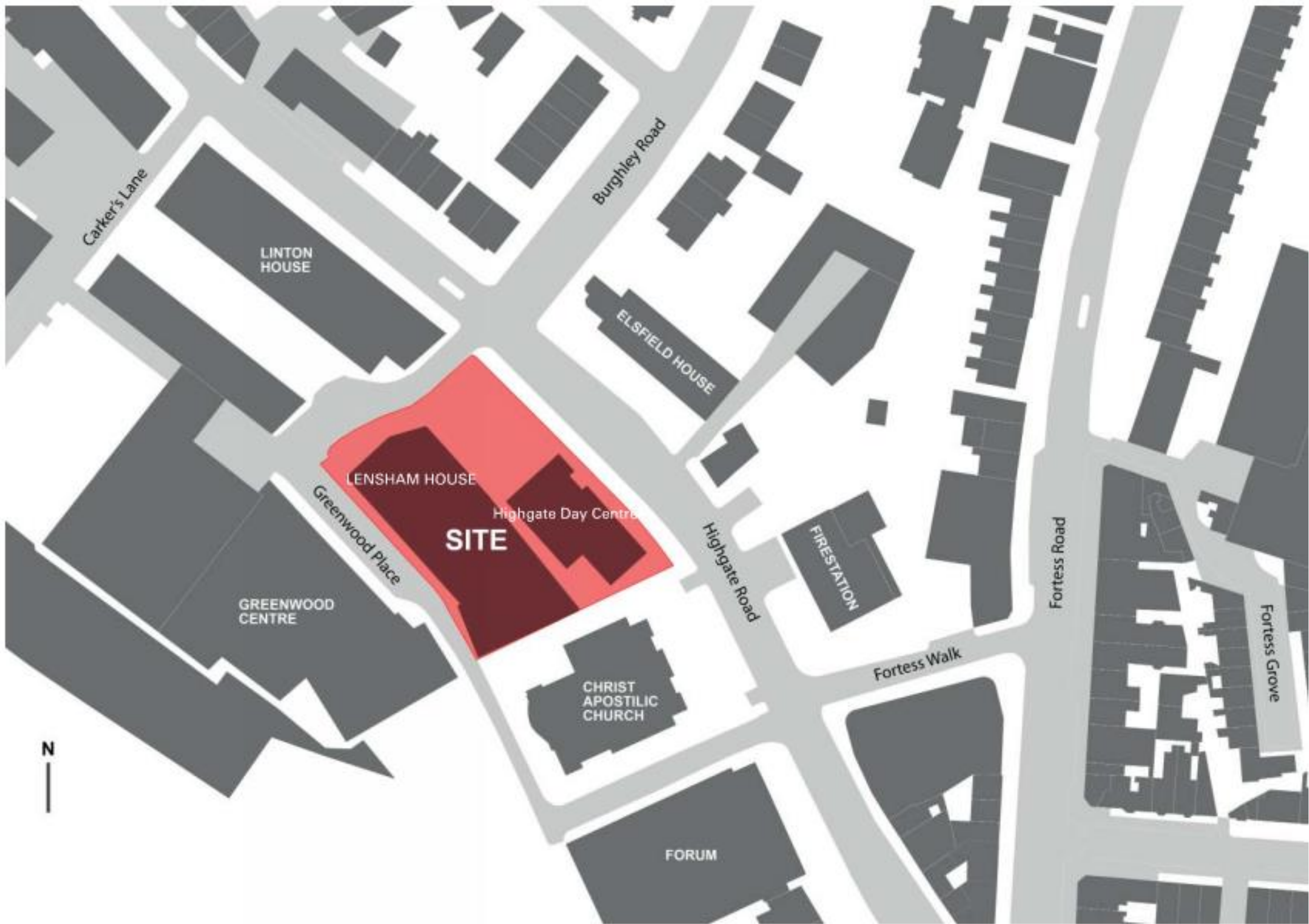


Application No: 2016/5372/P
Highgate Centre and A&A Self Storage (Former
Lensham House) 19 - 37 Highgate Road, NW5 1JY
and; 19 Greenwood Place, NW5 1LB London

Scale:
1:1250
Date:
5-Jun-17



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Site Plan

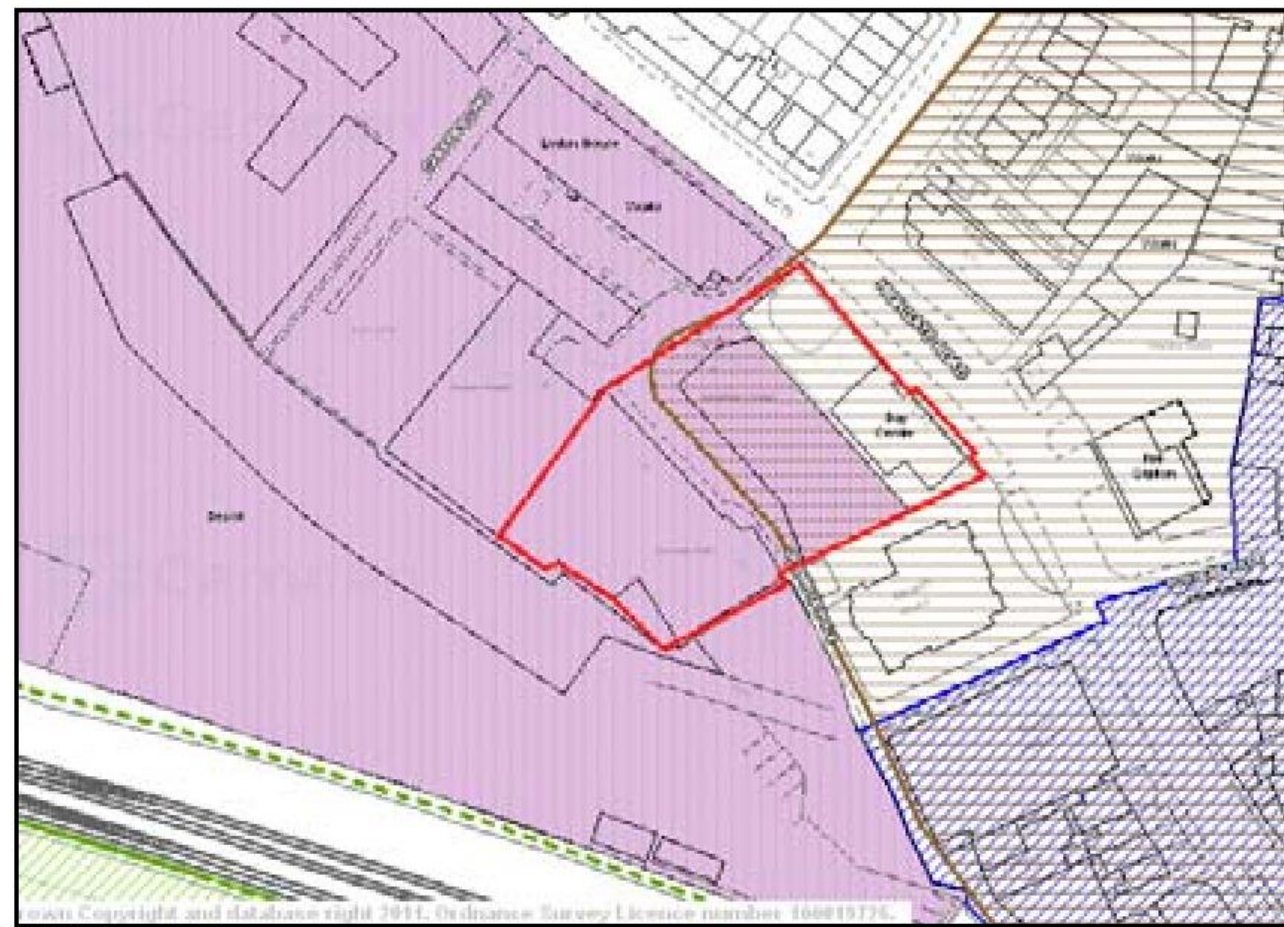
LDF Site Allocations –adopted Sept 2013

Site 39: 19-37 Highgate Road, Former Lensham House (A&A Storage) and 25– 37 Greenwood Place



GeoPerspective

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Site allocation guidance

Redevelopment of the site for mixed uses including replacement D1 community facilities, new flexible employment floor space and housing on appropriate parts of the site.



Left: Looking south over Highgate Road. A&A Self-Storage in centre of image, Highgate Centre to the left



Left: Front elevation of Highgate Centre



Left: Highgate Centre building with Linton House in the background



Left: Side/rear elevations of A&A Self-Storage building (centre) from Greenwood Place



Above: Image of Forum (left), the church (centre) and Linton House (right)



Left: The Grade II listed Christ Apostolic Church (adjacent to application site)



Left: The Grade II listed Forum (adjacent to the church)



Above: Photos of the Linton House (adjacent to application site)



Left: 28a and 28b Highgate Road (right) and Elsfied House, 42 Highgate (centre), which lie opposite the application site



Left: The semi-detached pair of residential properties at 44-46 Highgate Road

Drawings, plans and CGIs of approved scheme under 2013/5947/P

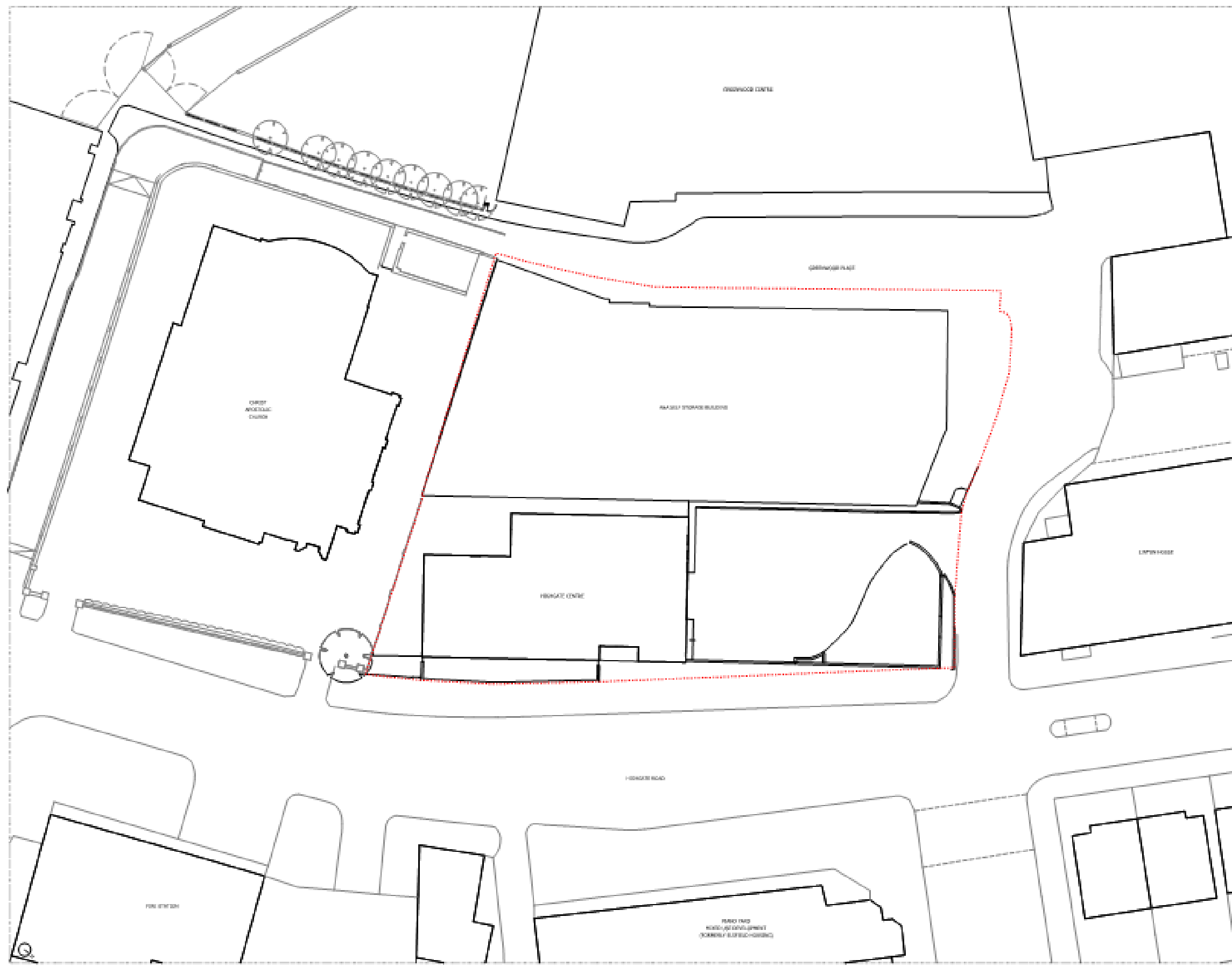


Drawings, plans and CGIs of approved scheme under 2013/5947/P



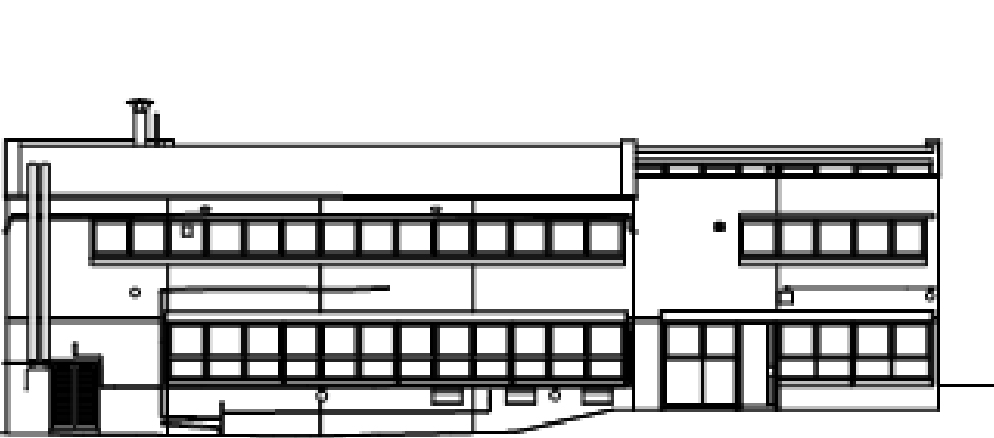
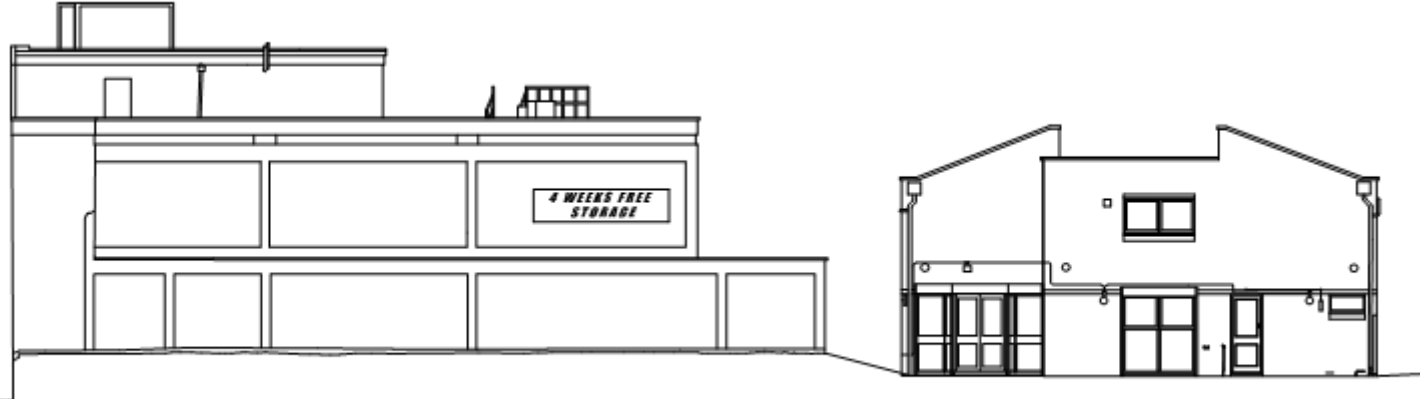
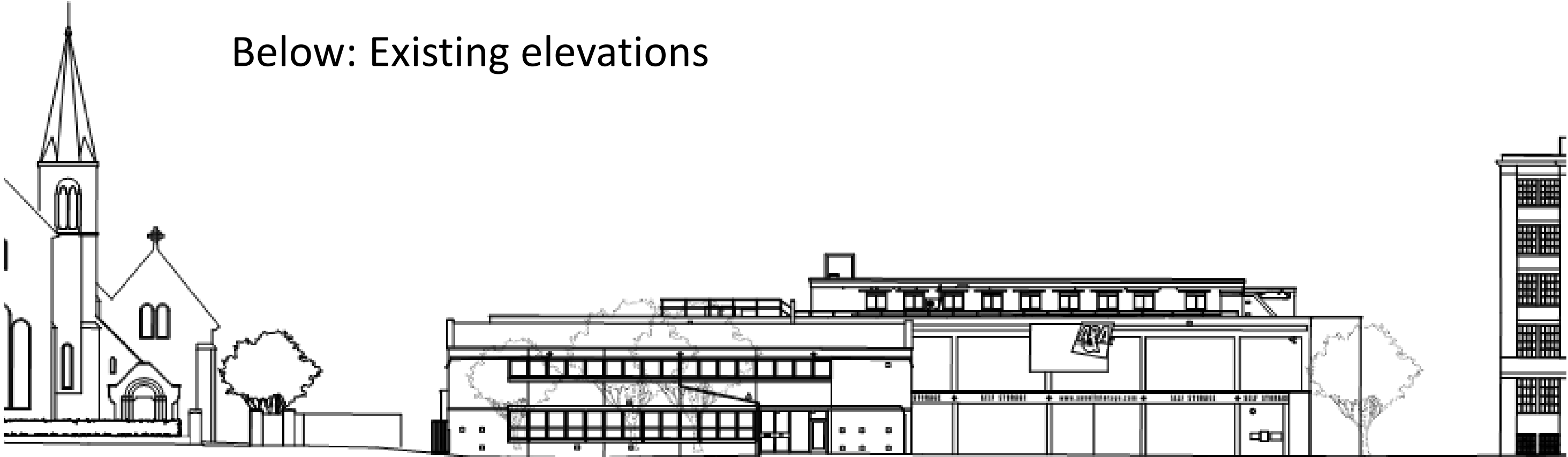
Greenwood Centre for Independent Living approved under 2013/5947/P

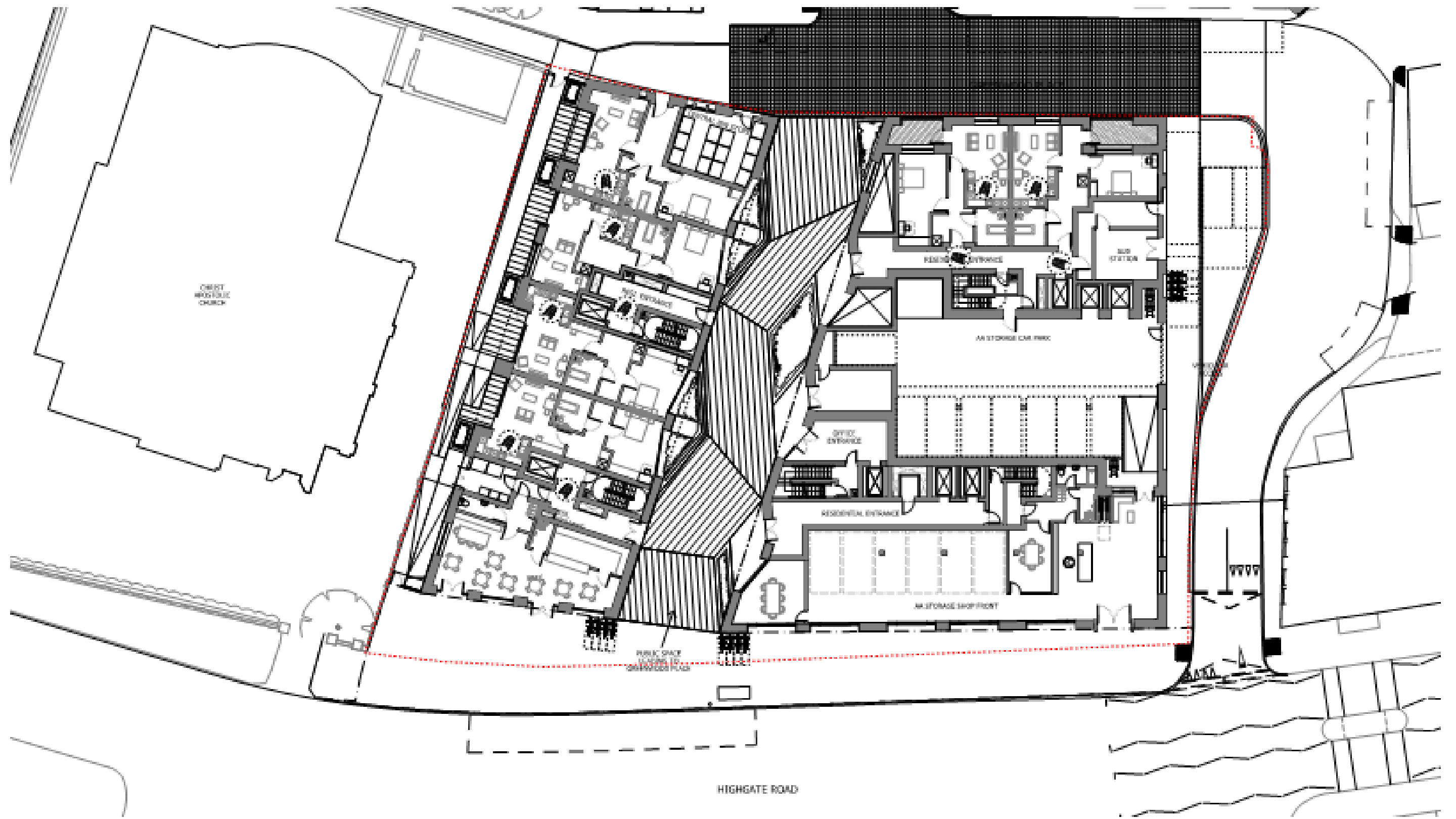




Above: Existing site plan

Below: Existing elevations





Above: Proposed site plan

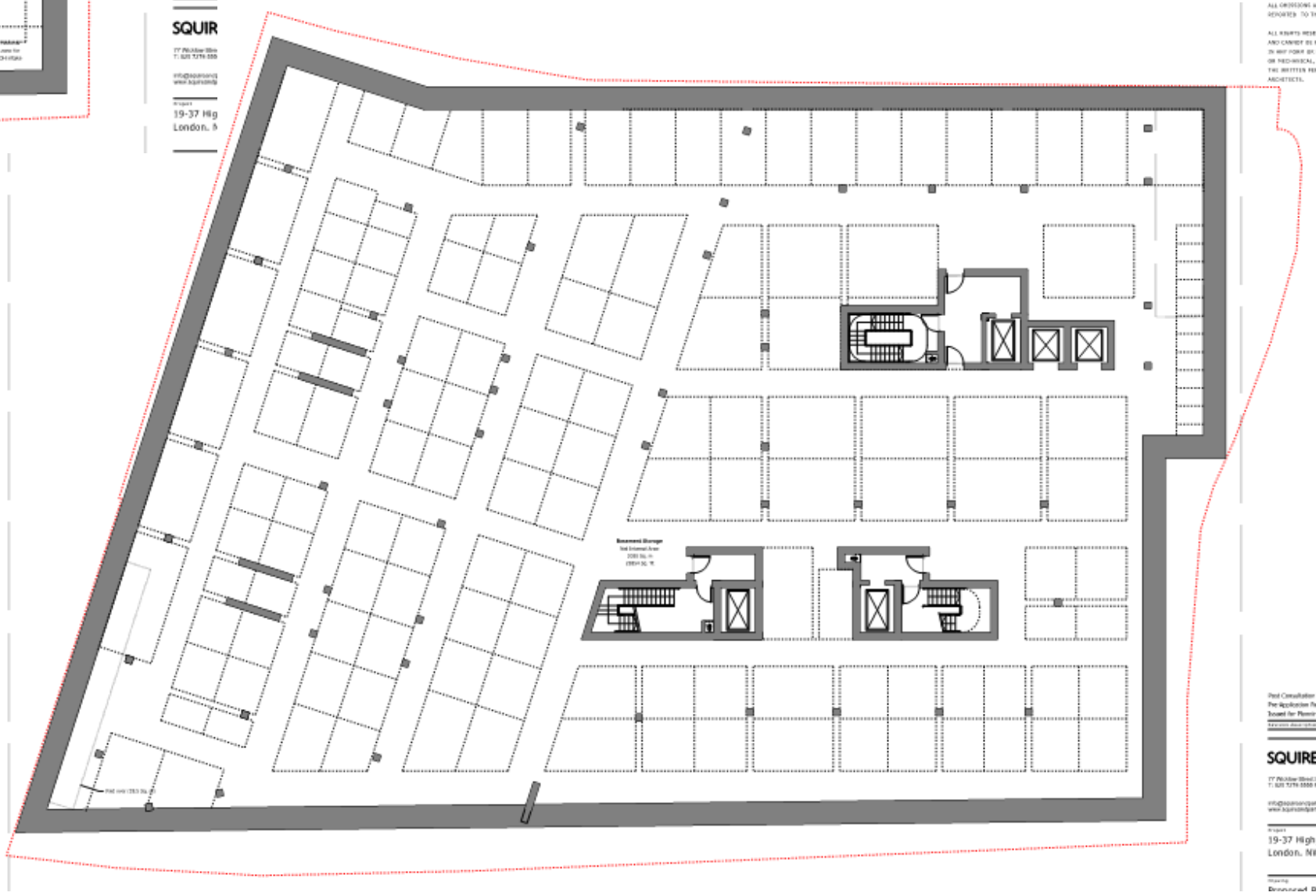
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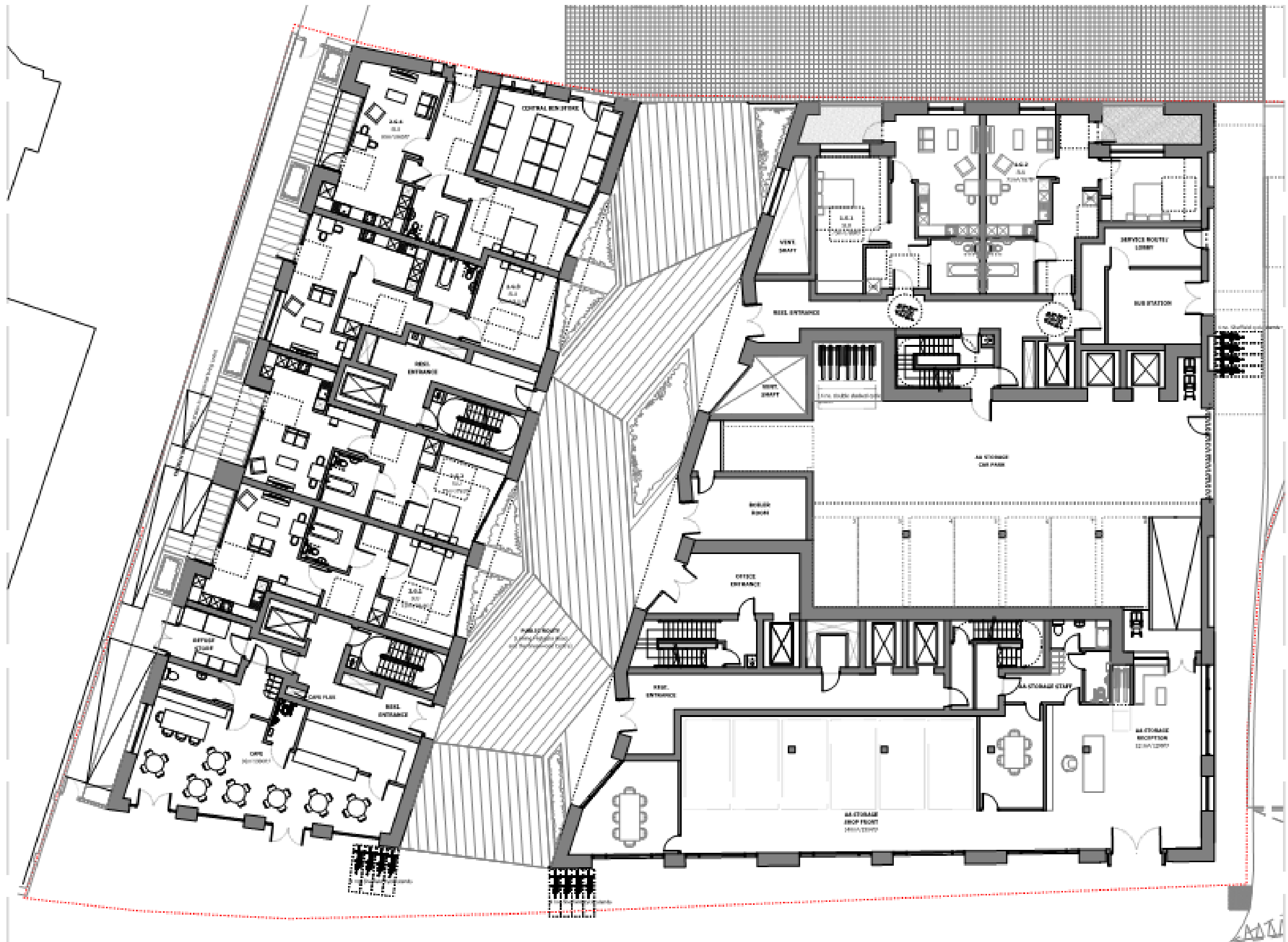
Plot Consultant
Per Application
Based on Plans
SQUIRE
17 Pinner Way
London, N17 9JH

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SHOWN TO THE
CENTRE UNLESS
OTHERWISE
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Above and right: Proposed basement levels

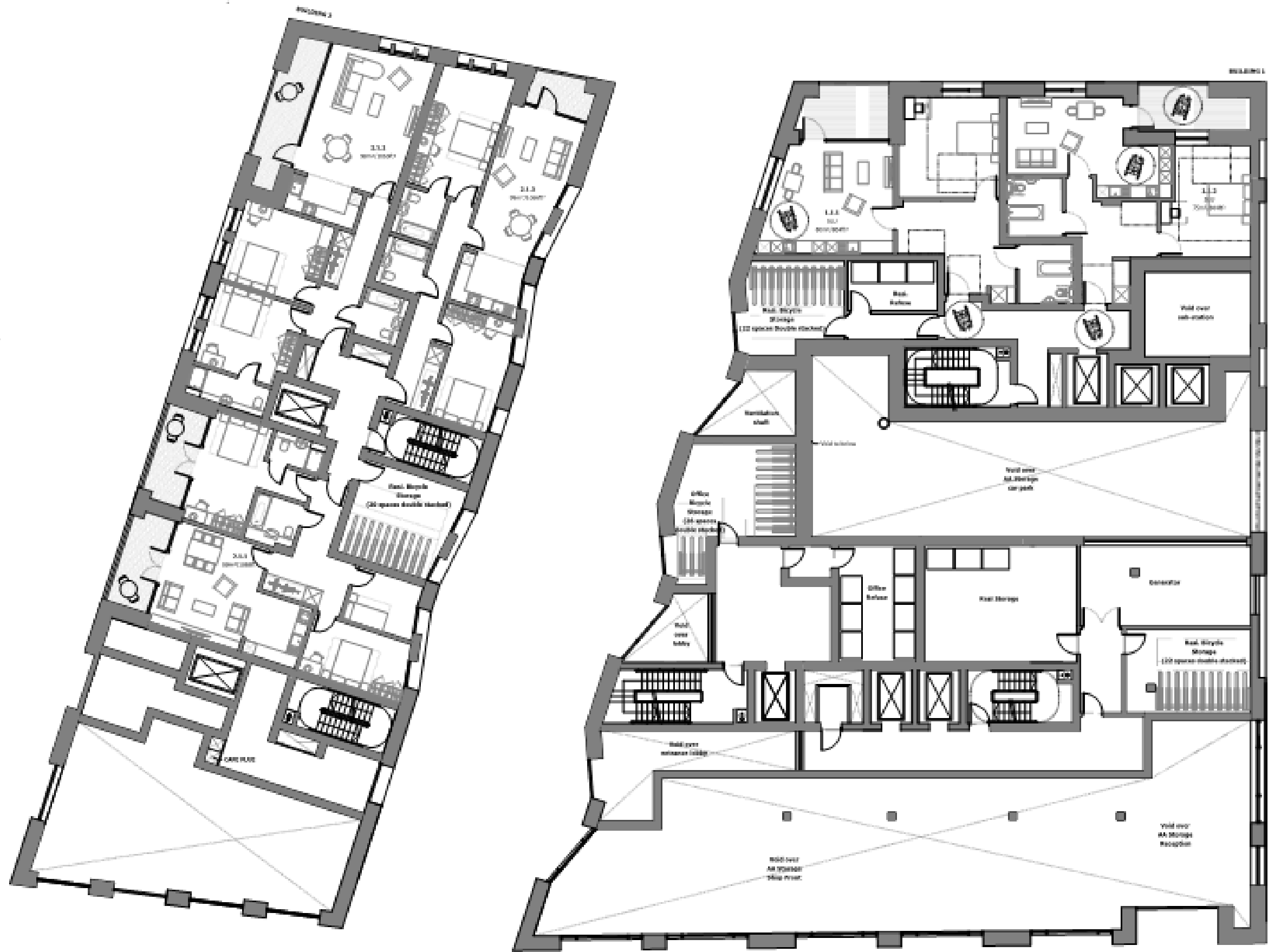


Plot Consultant
Per Application
Based on Plans
SQUIRE
17 Pinner Way
London, N17 9JH

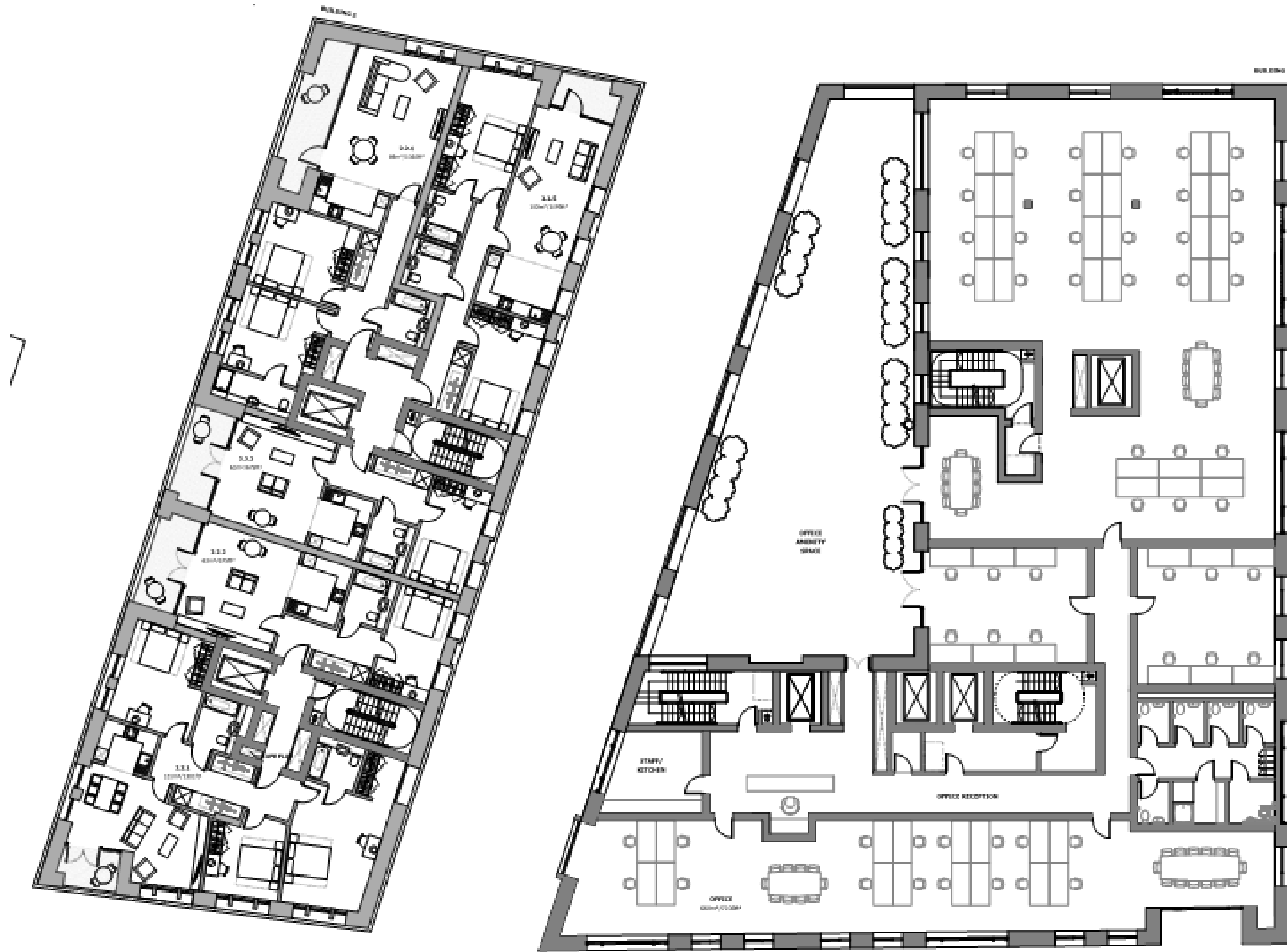


Above: Proposed ground floor plan

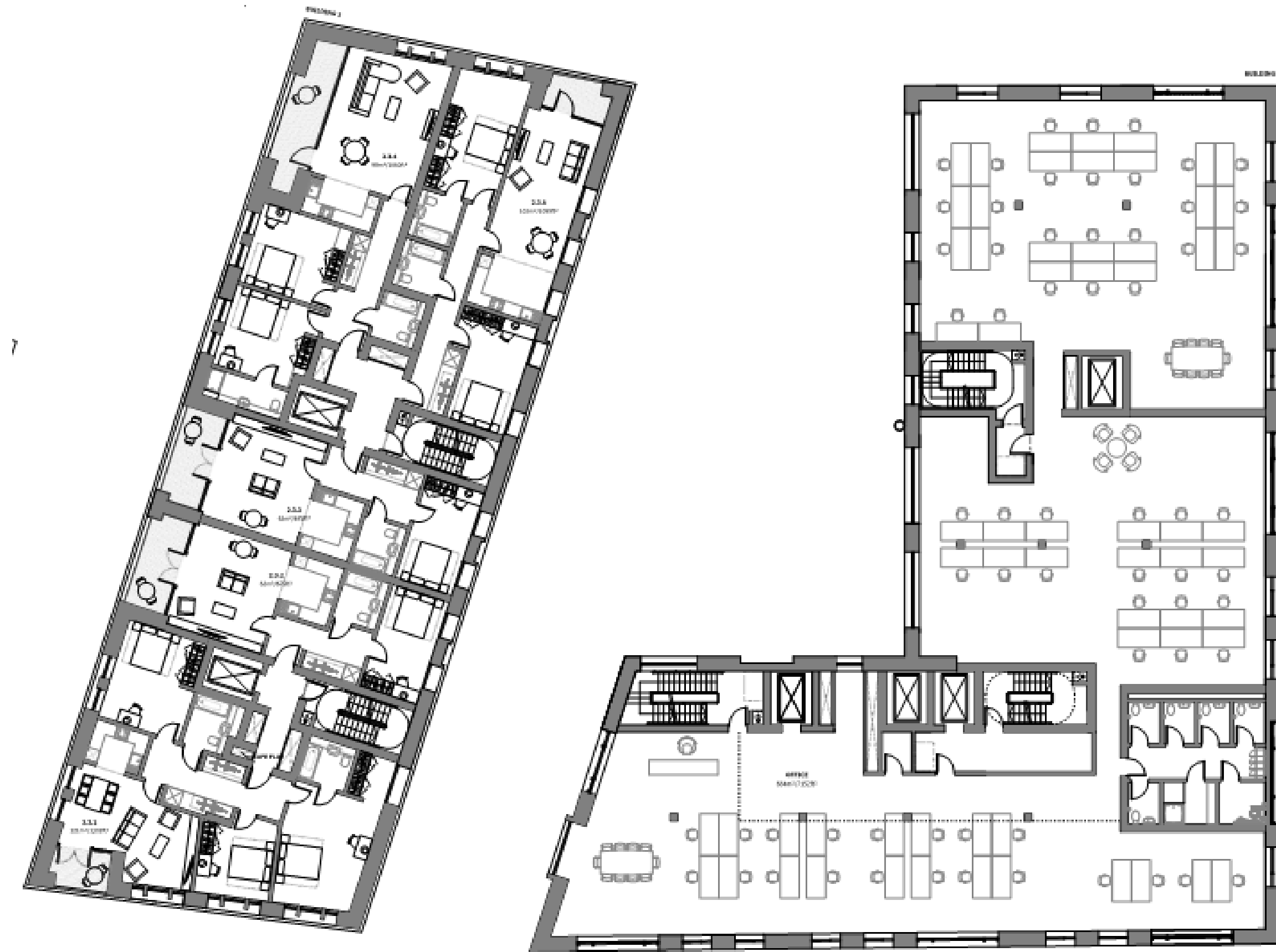
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Above: Proposed first floor plan



Above: Proposed second floor plan



Above: Proposed third floor plan



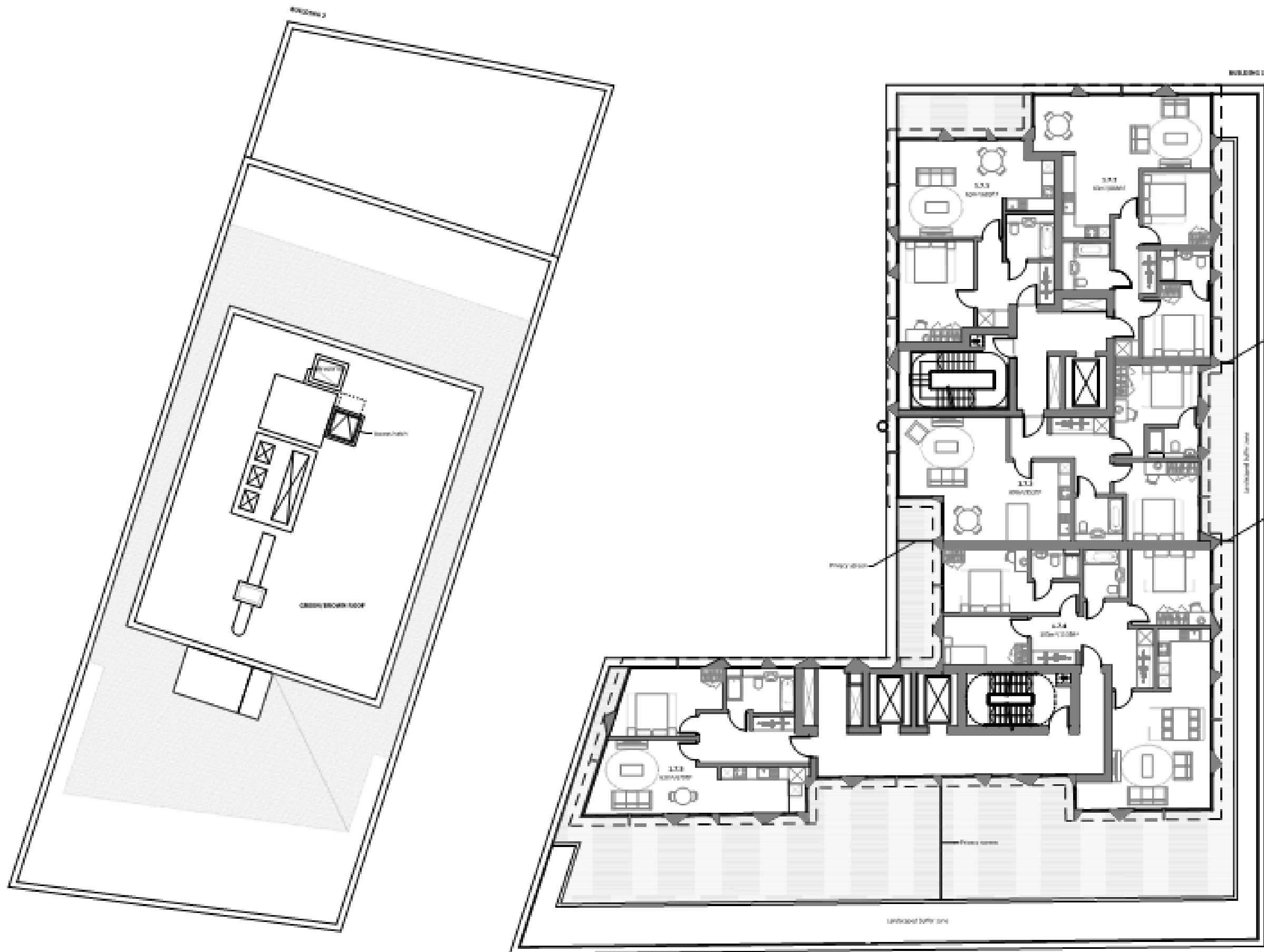
Above: Proposed fourth floor plan



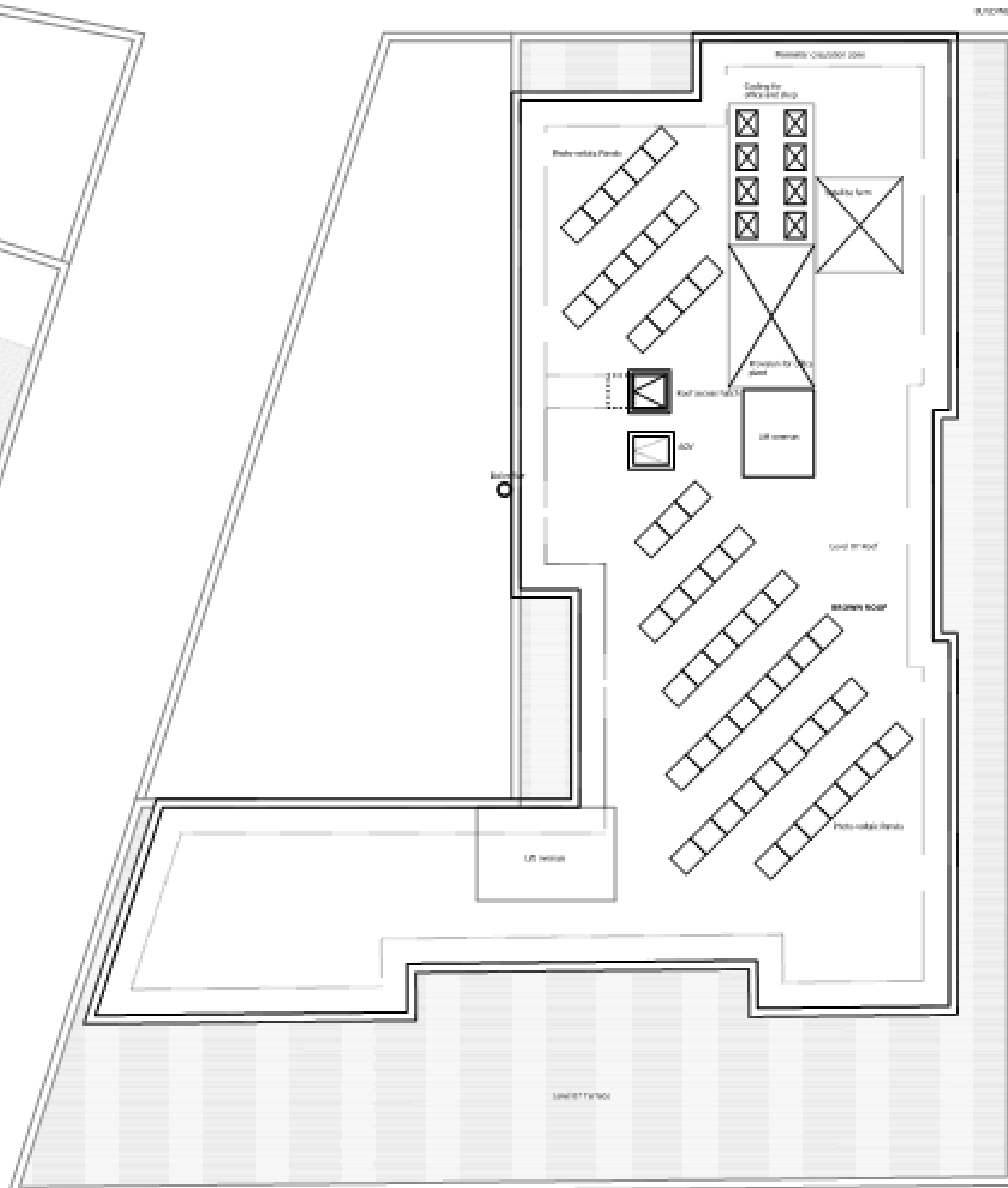
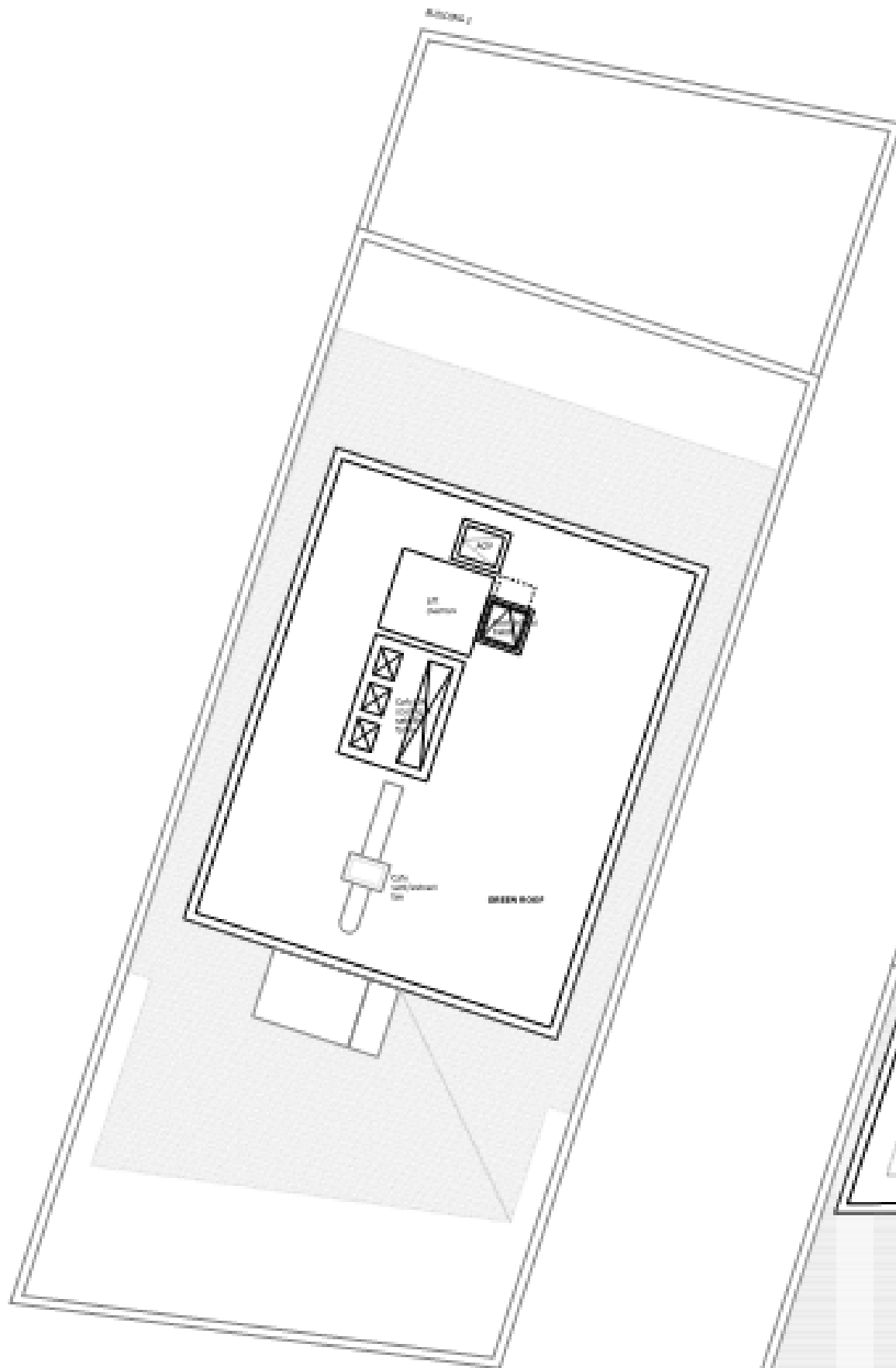
Above: Proposed fifth floor plan



Above: Proposed sixth floor plan

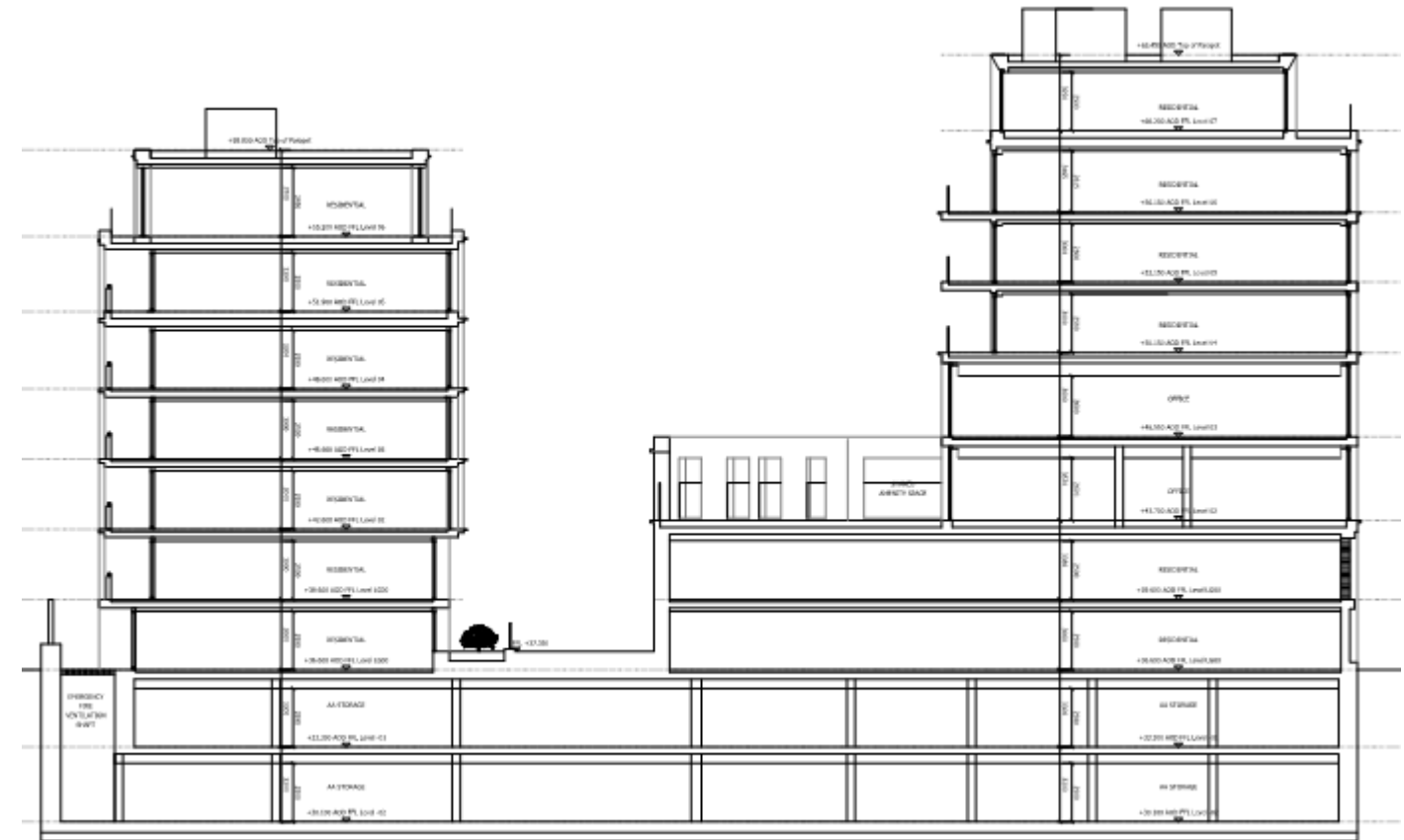
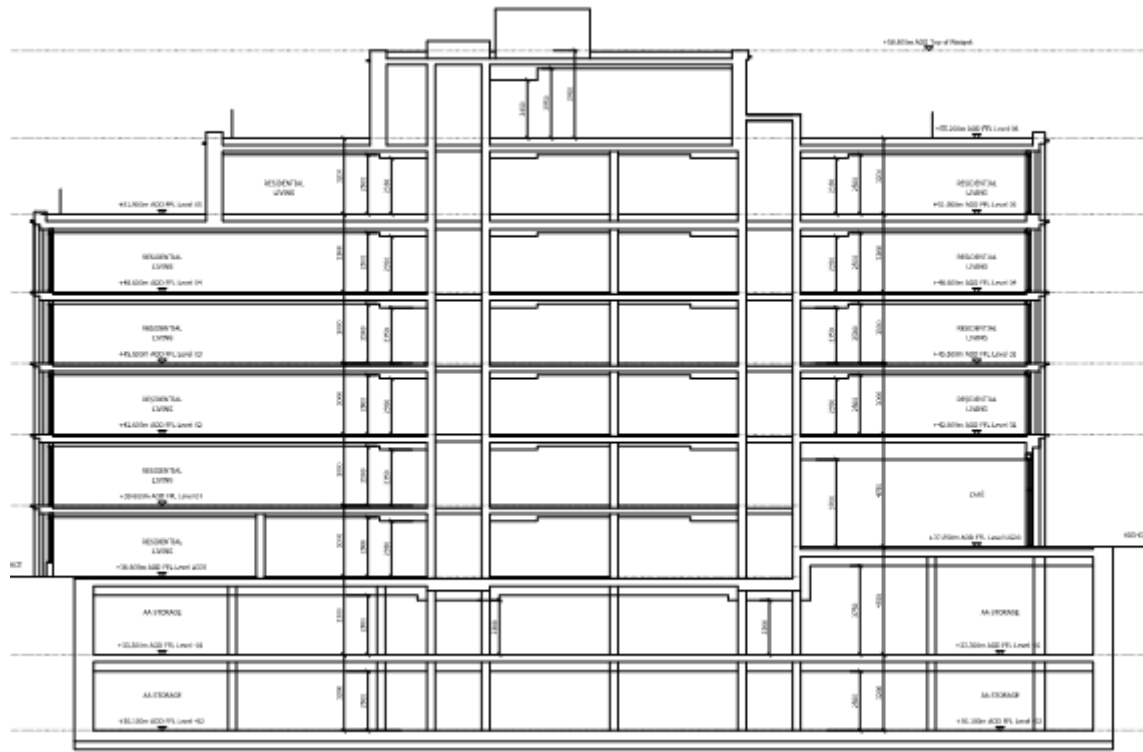
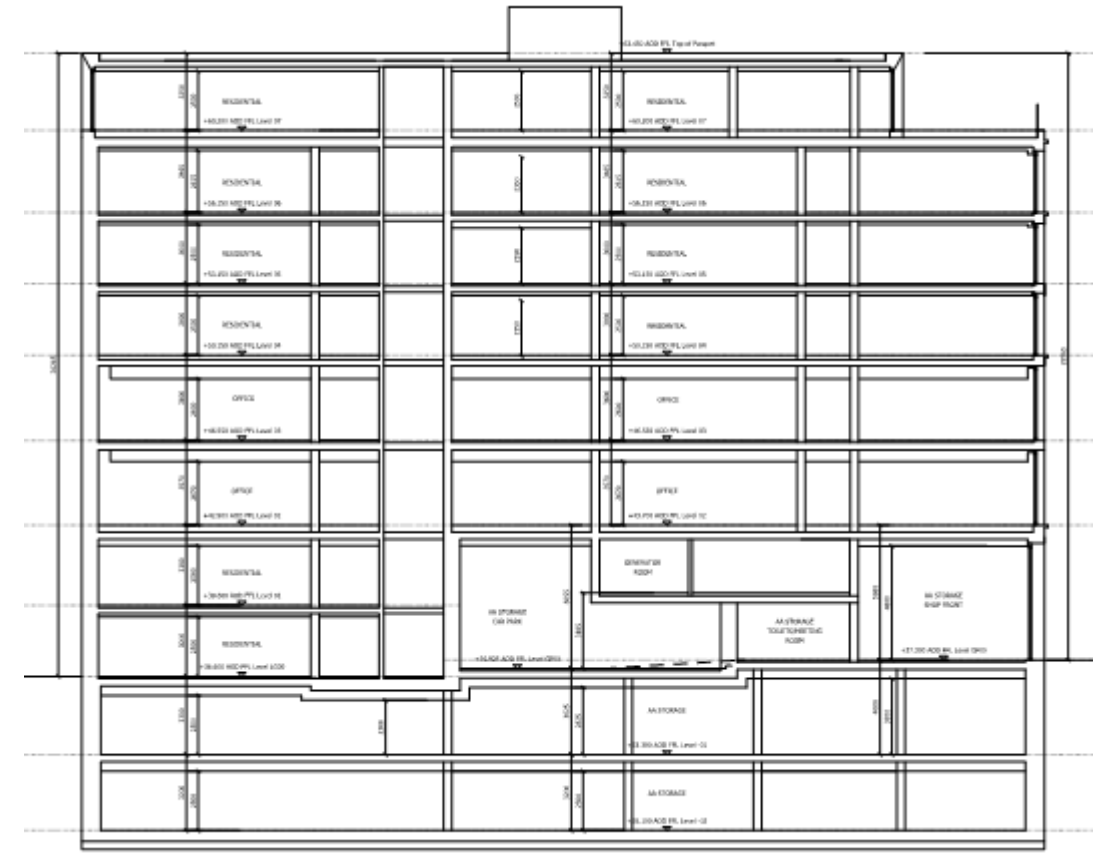
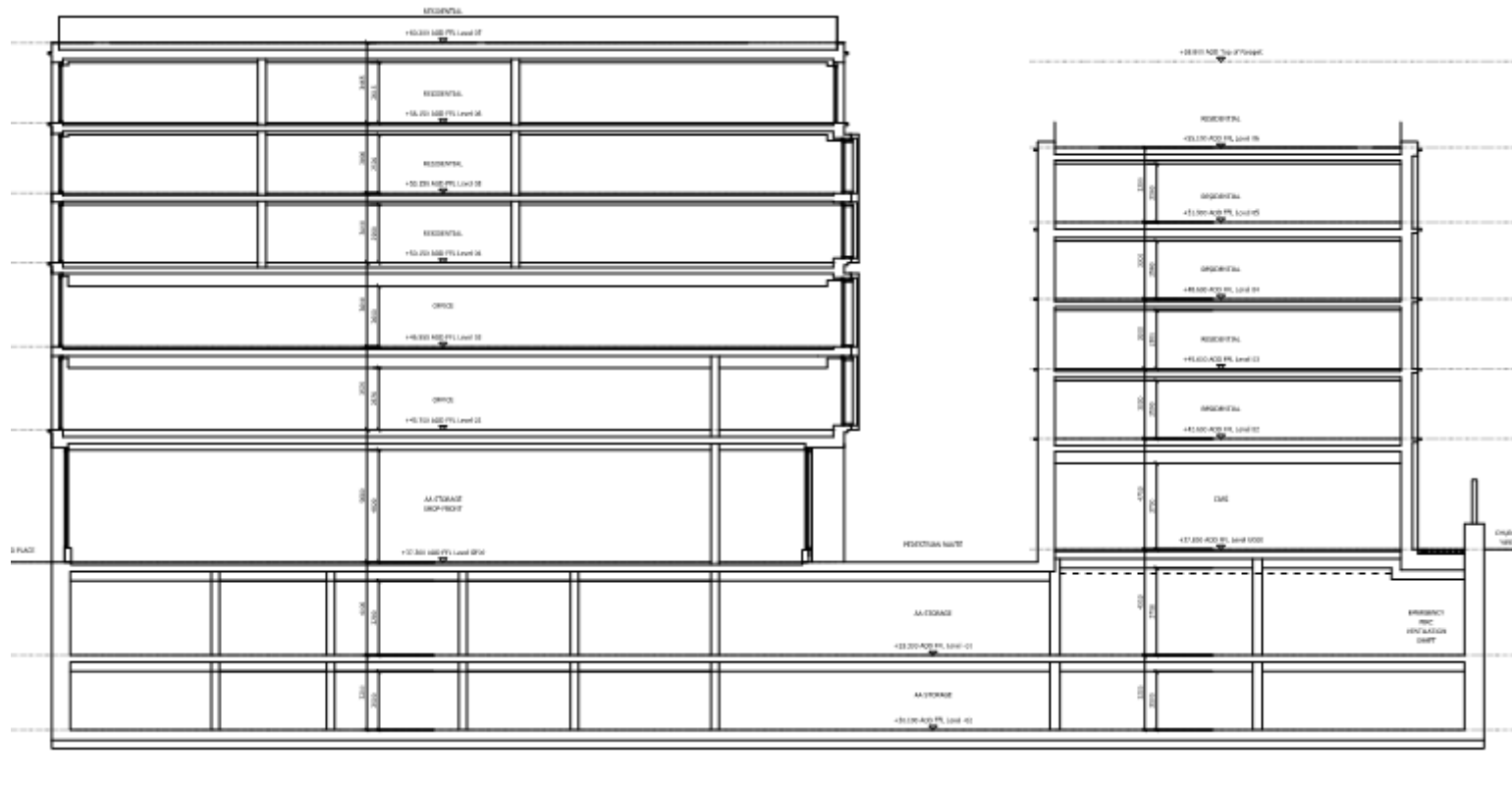


Above: Proposed seventh floor plan



Above: Proposed sixth floor plan

Below: Proposed sections



Below: Proposed elevations – Building 1



Below: Proposed elevations – Building 2



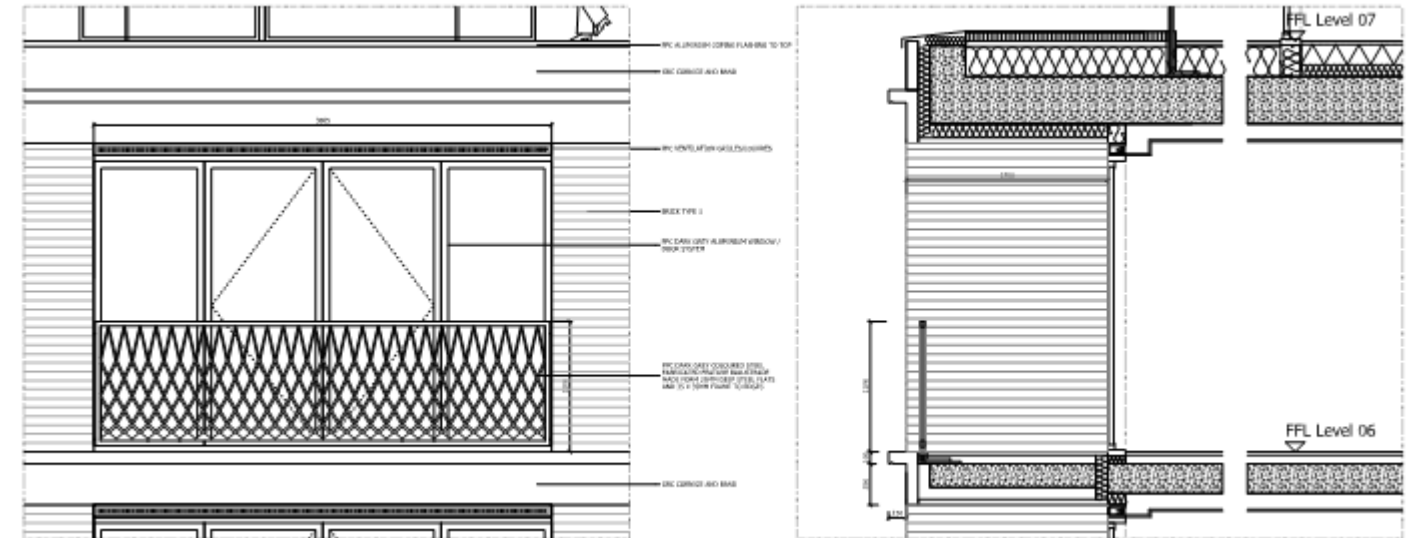
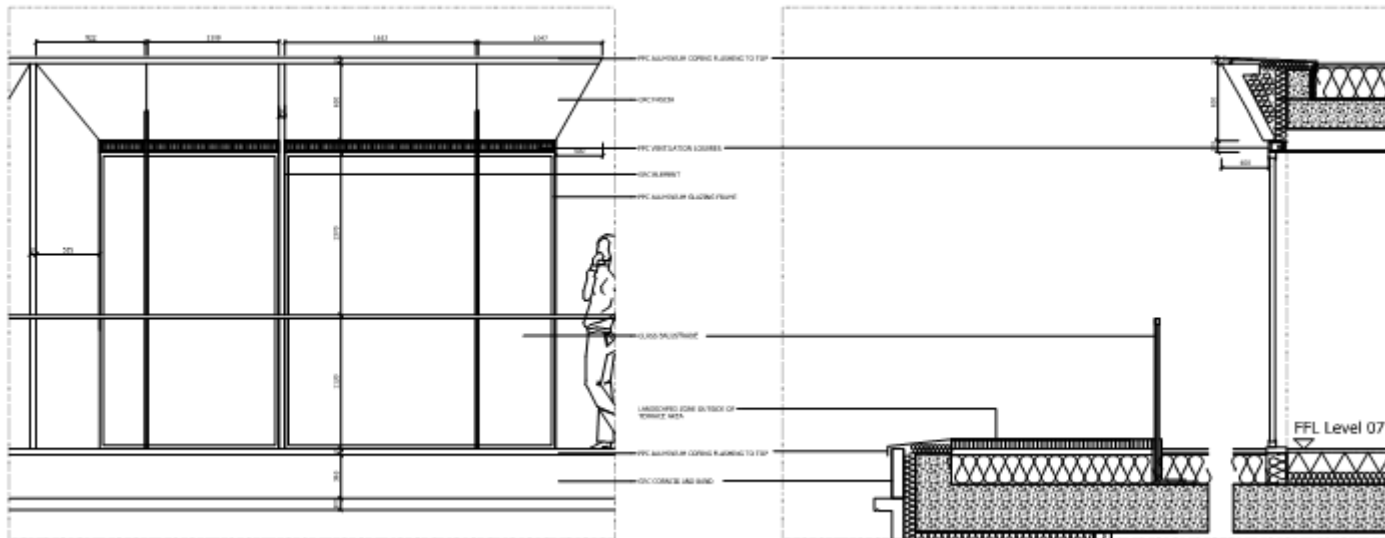
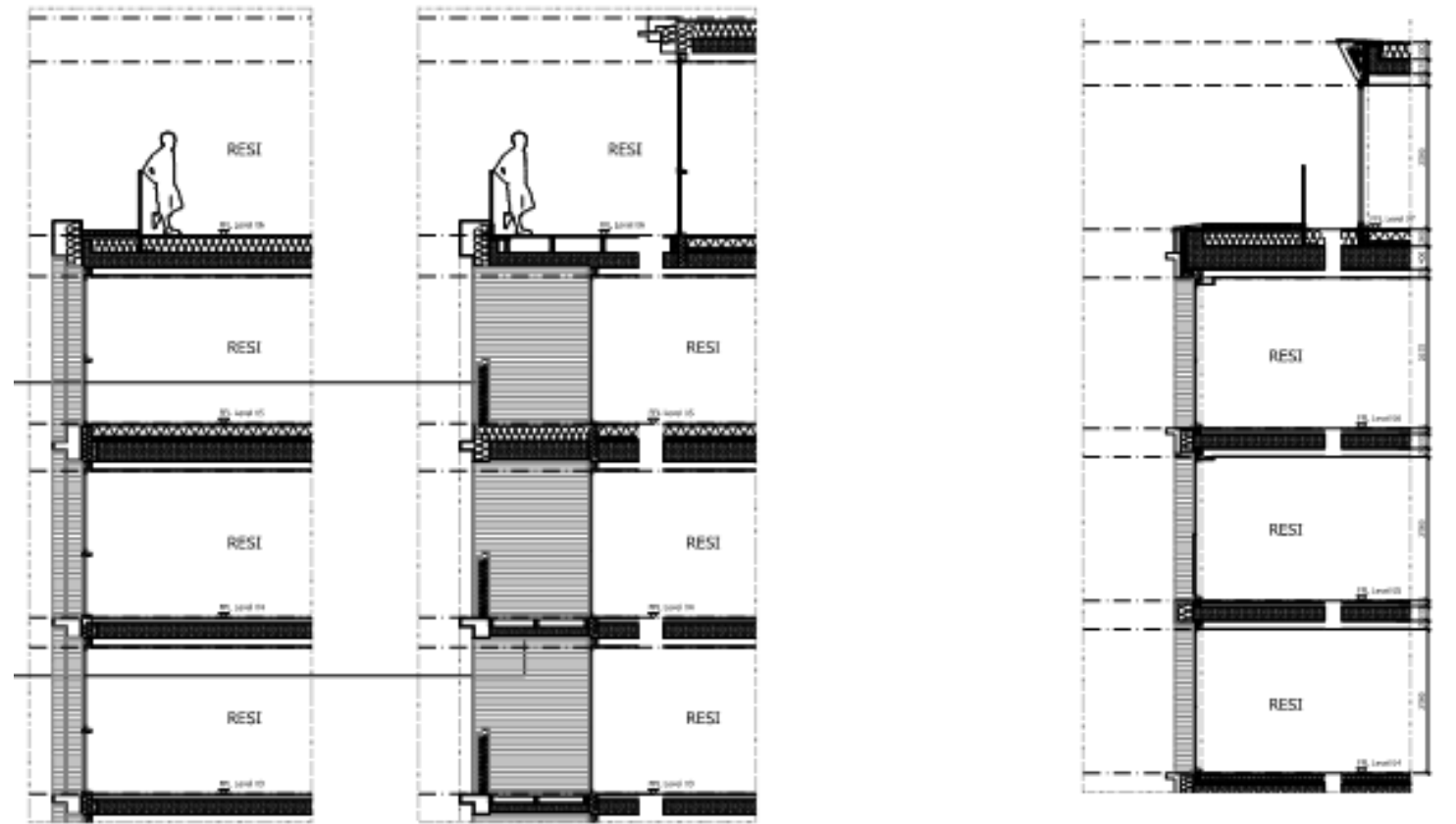
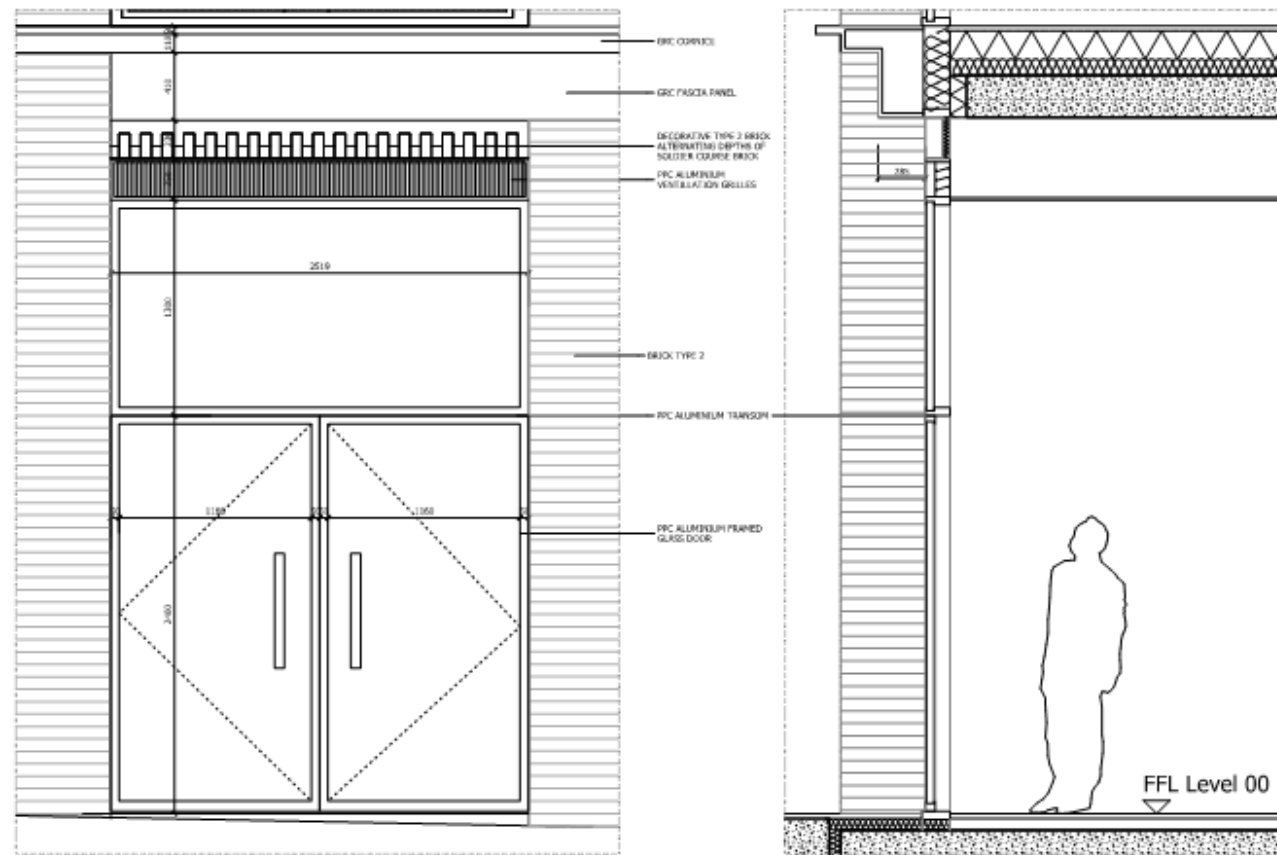
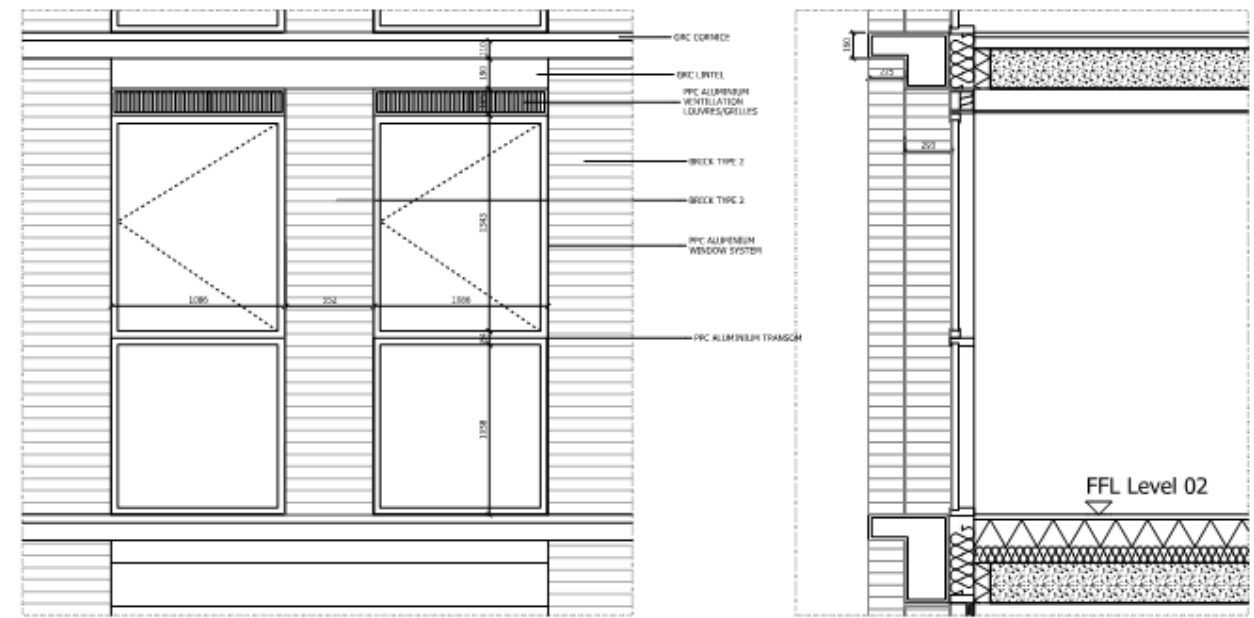
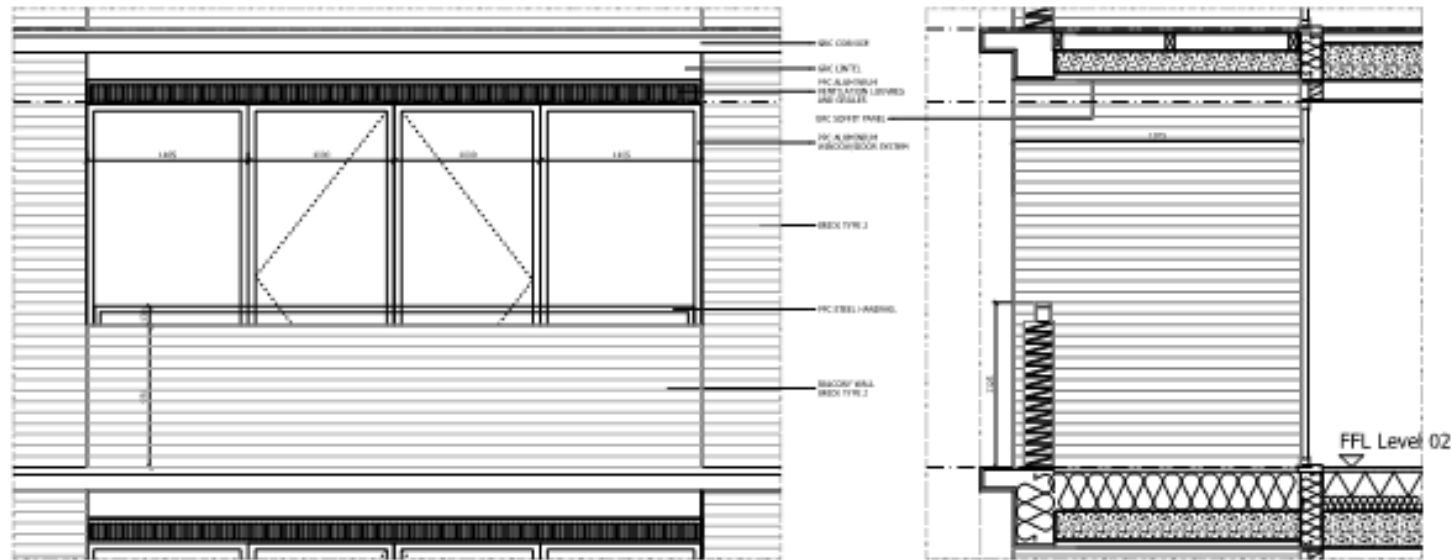


Above: Context elevation showing church, proposal and Linton House



Above: Context elevation showing The Forum, church and the proposal

Below: Selection of detailed drawings



Below: CGIs and proposed views



Below: CGIs and proposed views



Below: CGIs and proposed views

