



Grand Union House, London NW1  
Planning Statement  
December 2018

## **Planning Statement**

### **Grand Union House**

On behalf of: Camden Mixed Developments Limited

December 2018

## Contents

Page

## Appendices

1	Executive Summary	3	A	Planning History
2	Introduction	6	B	Relevant Planning Policies
3	Site and Surrounding Area	8		
4	Relevant Planning History	10		
5	Consultation and Engagement	12		
6	Description of Proposals	14		
7	Planning Policy Framework	17		
8	Land Use	20		
9	Residential Design	38		
10	Design, Heritage and Visual Impact	45		
12	Energy and Sustainability	58		
13	Transport	65		
14	Technical Considerations	73		
15	Planning Obligations	80		
16	Summary and Conclusions	82		

# 1 Executive Summary

- 1.1 The application proposals brought forward by Camden Mixed Developments Limited provide an exciting opportunity to create a high quality mixed use development of a building within Central London that is currently underused and unattractive.
- 1.2 The existing building at Grand Union House, 16-20 Kentish Town Road, was built circa 30 years ago. It is dated, unattractive and has a neglected appearance. There is a considerable amount of anti-social behaviour that takes place within and around the Site which makes it feel generally unsafe. The long blank frontage and negative interaction with the building's boundaries detracts from the public realm, and the Site's location within Camden Town Centre, the Regent's Canal Conservation Area, and the secondary protected frontage within which the Site lies.
- 1.3 The Site sits just north of Camden Town underground station and will eventually sit adjacent to the new entrance to Camden Town underground station on Buck Street proposed by Transport for London (TfL). Planning permission was also recently granted for a new market on Buck Street opposite the Site. With this in mind, the building occupies a long and important frontage within Camden Town which has the potential to create an enhanced, attractive and active urban realm on an alternative route (to Camden High Street) north from the station. The scheme deliver a significant new office building, 6 new affordable homes and active small ground floor units, providing shops, restaurants and cafés and leisure uses.
- 1.4 Sainsbury's, the adjacent landowner, has an operational customer car park at basement level (below Grand Union House) which must continue in operation during the construction works and which restricts all proposed works to ground floor and above. Accordingly, the intention is to strip back the existing building to first floor slab level but to retain the existing structure and then rebuild from first floor slab level upwards. The reuse of the existing structure is considered to be a sustainable method of construction. There is car parking (12 spaces) at ground floor level owned and used by the adjacent residential units (Grand Union Walk) that front the canal, which must be retained.
- 1.5 The Site represents an opportunity to create high quality employment space, with associated external amenity space at third floor and roof levels, suitable for

modern office occupiers. The proposed office floorspace is envisaged to cater for a diverse range of businesses from start-ups to Small and Medium Enterprises (SME) and growing companies. The proposals have the potential to generate up to 450 new jobs.

- 1.6 The proposals will also provide public realm enhancements, which include new street trees, a widened and improved pedestrian and servicing route through the Site and enhanced public realm.
- 1.7 Throughout the process the Applicant has engaged with the adjacent landowners, Sainsbury's and St Michael's church, in respect of the development proposals. The intention has been to seek to deliver further enhancements to the public realm around the Site in collaboration with the adjacent landowners. At this stage the construction programme of the Applicant does not align with Sainsbury's or the church. However, the proposals would facilitate the delivery of further public realm enhancements, should there be an opportunity in the future. We hope that the scheme will act as a catalyst for change.
- 1.8 The proposed development will deliver the following benefits:
  - Regenerate and transform the existing area;
  - Sustainable reuse and regeneration of an underutilised building;
  - Provision of 6 much needed affordable homes (100% of Camden's affordable housing floorspace requirement);
  - Provision of up to 450 new jobs;
  - Provision of new active public uses at ground floor level to reactivate street frontages with a mix of shops, restaurants and cafes and leisure uses;
  - Activate 99m of street frontage (versus 18m existing);
  - High quality and attractive design, embracing the principles of sustainable design and construction;
  - Better building energy use through installation of modern and efficient facilities and systems;
  - Improvement to the surrounding public realm, widening of the route through the Site and provision of new street trees; and
  - Creation of a safe and secure environment for existing and future residents, employees and visitors.

- 1.9 The proposals seek to comply with the principle of the National Planning Policy Framework (NPPF), the adopted London Plan, and Camden's Local Plan.

## 2 Introduction

2.1 This Planning Statement ('the Statement') is submitted in support of a detailed planning application ('the Application') made on behalf of Camden Mixed Developments Limited ('the Applicant') for the partial demolition and redevelopment ('the Proposed Development') of Grand Union House, 16-20 Kentish Town Road, London ('the Site').

2.2 This Statement sets out the planning case in support of the Application. It summarises the planning history of the Site and assesses the Proposed Development in the context of relevant policies and guidance.

2.3 The proposals are described in greater detail in the Development Proposals section of this statement. In summary, planning permission is sought for:

**“Partial demolition and redevelopment of the existing building, to provide a new office (Class B1) building with associated roof terraces, ground floor flexible town centre uses (Class A1 and/or A3 and/or D2), and 6 affordable housing units, along with associated landscaping works.”**

2.4 The statement is structured as follows:

- Section 3 – description of the Site and surroundings;
- Section 4 – details of the Site's background and planning history;
- Section 5 – details of the pre-application consultation;
- Section 6 – details of the Development Proposals;
- Section 7 – relevant planning policy framework;
- Section 8-13 – consideration of material planning considerations arising from the Application proposals;
- Section 14 – a summary of the planning obligations arising from the proposals;
- Section 15 – summary and conclusions.

2.5 The Proposed Development has been designed by AP Architects ('APA') and is described in Section 6 of this Statement as well as the Design and Access Statement prepared by APA. This Statement should be read in conjunction with the plans and drawings submitted, as well as the following documents which are



submitted in support of this Application (in addition to this Statement):

- Design and Access Statement produced by AP Architects;
- Landscape Statement produced by Turkington Martin;
- Affordable Housing Statement produced by Gerald Eve LLP;
- Daylight and Sunlight Assessment produced by Point 2 Surveyors;
- Statement of Community Involvement produced by Four Communications;
- Sustainability Statement (including BREEAM Pre-Assessment) produced by WSP;
- Acoustic Report produced by WSP;
- Air Quality Assessment produced by WSP;
- Construction Management Plan produced by RPM;
- Transport Assessment (including Travel Plan, Waste Strategy and Delivery and Servicing Management Plan) produced by WSP;
- Sustainable Urban Drainage Strategy produced by WSP;
- Townscape and Visual Impact Assessment produced by Ettwein Bridges;
- Heritage Statement produced by Ettwein Bridges;
- Structural Report produced by WSP;
- Energy Statement produced by WSP;
- Completed HUDU Matrix produced by WSP;
- Regeneration Statement produced by Quod;
- Arboricultural Assessment produced by WSP; and
- Financial Viability Assessment produced by Savills.

2.6 This Statement sets out the planning assessment of the Proposed Development and assesses it in the context of national, regional and local planning policy and guidance.



### 3 Site and Surrounding Area

- 3.1 The Site is made up of 16 Kentish Town Road and 20 Kentish Town Road (Grand Union House) located within the London Borough of Camden.
- 3.2 The buildings are located in the north-western corner of the triangular block between Kentish Town Road, Camden Road and Regents Canal on the eastern side of Kentish Town Road, opposite the entrance to Buck Street, 100 yards north of Camden Town underground station. Accordingly the Site benefits from a Public Transport Accessibility Level (PTAL) of 6b (the highest possible level).
- 3.3 The Site is also located opposite the proposed new entrance/exit to Camden Town underground station, on Buck Street. A planning application is due to be submitted by TfL at the end of 2019/beginning of 2020. Planning permission was recently granted for a new market on Buck Street, opposite the Site.
- 3.4 The Site is located within Camden Town Centre and forms a secondary protected frontage. The Site also sits within the Regent's Canal Conservation Area. There are a number of listed and locally listed buildings nearby, most notably the Grade II listed Church of St Michael's, adjacent.
- 3.5 To the rear of the Site sits Barnes House, an affordable housing block. The building is an 'L' shaped affordable housing block with frontages onto Camden Road and St Michael's Church. Balconies overlook the area to the rear, adjacent to the Site. There is also a garden owned by the mental health charity, Mind, to the rear of Site.
- 3.6 The existing building occupies the eastern side of Kentish Town Road, and is located on the former site of a four storey Art Deco main production building of the ABC factory (built in 1939 and demolished in the early 1980s). The existing building is part of the subsequent 1980s Sainsbury's supermarket development on Camden Road designed by Nicolas Grimshaw Architects.
- 3.7 The existing building, at 20 Kentish Town Road, has a raised first floor podium level, with columns and metal sheeting at ground floor level to shield the car parking behind. From first floor podium level up, there is a single storey of office (Class B1) accommodation with an additional mezzanine level. The office accommodation is

accessed off a lift and stair core located adjacent to the route through the Site at ground floor level. On the opposite side of the route is a small retail (Class A1) unit. There is also a retail bar (Class A4) located within the southernmost unit of the building. 16 Kentish Town Road is a separate single storey building accessed directly off Kentish Town Road, adjacent to the retail bar within 20 Kentish Town Road. Some of the office accommodation is occupied and the retail bar is also currently let. The rest of the building is vacant.

- 3.8 Pedestrian access through the Site is limited and priority is given to vehicles and service/delivery functions. The existing building is not considered to contribute to the Regent's Canal Conservation Area within which it sits.
- 3.9 There are two (interconnected) routes through the Site at ground floor level, one to the north of the Site and one to the south, albeit these are focussed more heavily on vehicular access rather than pedestrian as they are predominantly used for Sainsbury's customers and service access, including the customer car park entry and exit. The proposals seek to enhance the pedestrian experience around and through the Site.

## 4 Relevant Planning History

- 4.1 A thorough review of Camden's online planning history register has been undertaken and the planning history of relevance is listed here. A full planning history table is provided at Appendix A.
- 4.2 On 6 February 1985, outline planning permission (ref. 8400943) was refused for a mixed development of residential, commercial studio workshops, and ancillary facilities retaining the existing bakery (Kentish Town Road building) and changing its use in part to commercial and residential. The associated conservation area consent application (ref. 8470177) for demolition in the conservation area was also refused. The associated listed building consent application (ref. 8470102) for demolition in the conservation area was withdrawn. The reasons for withdrawal are not available within the Council's records.
- 4.3 In February 1985 an outline planning application (ref. 8500097) for redevelopment of the northern part of the Site to provide residential and parking, and the southern part of the Site to provide refurbishment and redevelopment including partial demolition to provide accommodation for workshop, retail, office, recreation and social uses, was withdrawn. The associated listed building consent (ref. 8570019) for the demolition of parts of the existing site was also withdrawn. Again, the reasons for withdrawal are not available within the Council's records.
- 4.4 On 8 October 1985, outline planning permission (ref. 8401869) was granted for the redevelopment of the land known as the ABC Bakery site (17-21 Camden Road, 131-147 Camden Street, Camden Gardens and frontage to Kentish Town Road NW1) for the erection of buildings comprising: - South Side of the Canal – (a) a retail store with associated crèche, car parking, landscaping, servicing and access arrangements. (b) An industrial building with associated car parking and access arrangements. (c) a residential building with associated car parking and access arrangements fronting onto Kentish Town Road, NW1, North Side of the Canal – Residential buildings with associated car parking, landscaping and access arrangements.
- 4.5 On 30 April 1986, a reserved matters application (ref. 8600151) was approved for the re-development of the ABC Bakery site south of the Regent's Canal for the

erection of buildings comprising: (a) A retail store fronting Camden Road, (b) An industrial/workshop building fronting Kentish Town Road, and (c) A residential terrace fronting the Regent's Canal.

- 4.6 On 10 June 1987, a section 73 (minor material amendment application) (ref. 8701006) was granted for an amendment to planning permission ref. 8600151 including the introduction of an additional three storey house along the Canal frontage, the conversion of the end house nearest Kentish Town Road into a bedsit and maisonette, the reduction of car parking to provide 300 spaces, and external alterations.
- 4.7 Planning permission (ref. 9200997) was refused on 27 January 1993 for the change of use and works of conversion of ground floor retail unit and first floor light industrial unit to a Laser Games Centre within the meaning of Class D2 of the Town and Country Planning (Use Class) Order 1987.
- 4.8 On 25 March 1993, planning permission was granted (ref. 9201296) for the construction of a 100 seat cinema at ground level with works to include the re-arrangement of the access and parking accommodation. It is not believed that this planning permission was ever implemented.
- 4.9 Planning permission (ref. 9300766) for the change of use and works of conversion from retail and light industrial accommodation to provide a health club at first floor level and a shop and access at ground floor was granted on 26 October 1993. It is not believed that this planning permission was ever implemented.
- 4.10 Whilst Grand Union House was originally constructed as a light industrial building, it is understood that it was built speculatively, and accordingly has only ever been let and occupied as an office (Class B1a). The building is currently used as an office which aligns with Officer's views of the existing use, as noted within their pre-application response letter, dated 2 July 2007 (ref. 2007/2651).

## 5 Consultation and Engagement

- 5.1 Throughout the process the Applicant engaged with the adjacent landowners, Sainsbury's and St Michael's Church, in respect of the Proposed Development. There is an aspiration to seek to deliver further enhancements to the public realm around the Site in collaboration with the adjacent landowners. At this stage the Applicant's construction programme does not align with that of Sainsbury's or St Michael's Church.
- 5.2 The intention is that the Development Proposals will act as a catalyst for change within the immediate vicinity by will facilitating the delivery of further public realm enhancements should there be an opportunity in the future.
- 5.3 Sainsbury's, the adjacent landowner, have an operational customer car park at basement level (below 20 Kentish Town Road) which must continue in operation during the construction works and which restricts all proposed works to ground floor and above for the part of the building which sits above it. Accordingly, the intention is to strip back the existing building to first floor slab level but to retain the existing structure and then rebuild from first floor slab level upwards.
- 5.4 The reuse of the existing structure is considered to be a sustainable method of construction. There are 12 car parking spaces at ground floor level owned by the adjacent residential units at Grand Union Walk which front the canal. These must be retained as part of the Applicant's lease agreement with the land owner.
- 5.5 A public exhibition of the Applicant's initial proposals was held within the existing building on Thursday 01 November between 16:00 and 19:30 and on Saturday 04 November between 10:00 and 13:00. The exhibition included details of the Applicant's vision for Grand Union House presented on nine A1 exhibition boards. Members of both the communications and design teams were available to explain the information provided and answer questions from attendees.
- 5.6 In total, 50 people attended the exhibition over the two days including residents of Barnes House, tenants of the existing building and local residents, workers and business owners. Representatives from Castlehaven Community Association, Camden Town Unlimited, Camden Gardens, Kentish Town Neighbourhood Forum,

Trinity United Reformed Church and members of the congregation of St Michael's Church also attended the exhibition.

5.7 The feedback received found that residents and stakeholders agreed that the existing building had significant issues and its replacement was welcomed. In general it was considered that the Proposed Development would make a significant contribution to the surrounding area. The key issues that attendees discussed were:

- the proposed improvements to the public realm;
- the beneficial effect the scheme would have in reducing anti-social behaviour, which is an acute issue within the immediately vicinity; and
- ensuring that the design reflects Camden's character.

5.8 The activation of currently dead frontages along Kentish Town Road, the provision of new ground floor active uses and new office space at the upper floors, alongside affordable housing, was welcomed. Visitors welcomed the potential of the proposals to maximise the use of the building and enhance and promote Camden's commercial offering.

5.9 The consultation and engagement process is covered in further detail within the Statement of Community Involvement prepared by Four Communications and submitted as part of the Application.

## 6 Description of Proposals

6.1 This section of the Statement sets out the key aspects of the Proposed Development. A full explanation of the Proposed Development is set out within the Design and Access Statement prepared by APA and an assessment of the key aspects of the design is covered later within this Statement.

6.2 This Application seeks planning permission for the following:

**“Partial demolition and redevelopment of the existing building, to provide a new office (Class B1) building with associated roof terraces, ground floor flexible town centre uses (Class A1 and/or A3 and/or D2), and 6 affordable housing units, along with associated landscaping works.”**

6.3 A summary of the existing and proposed land use areas at the site are as set out in the table below:

Land Use	Existing GIA (sqm)	Proposed GIA (sqm)	Net Change GIA (sqm)
Office (Class B1)	2,807sqm	5,254sqm	+2,447sqm
Retail (Class A1 and A4)	382sqm	0sqm	-382sqm
Residential (Class C3)	0sqm	476sqm	+476sqm
Flexible Town Centre Uses (Class A1/A3/D2)	0sqm	275sqm	+275sqm
Flexible Retail (Class A1/A3)	0sqm	263sqm	+263sqm
Total	3,189sqm	6,268sqm	+3,076sqm

*Table 1: existing and proposed land use areas*



- 6.4 The existing buildings are of a poor quality and do not meet the requirements of modern office occupiers. The existing building sits on a raised first floor podium level and consists of a single storey of office accommodation with a part mezzanine. The existing building does not interact with the street at ground floor level due to an array of metal sheeting which has been installed to shield the ground floor under-croft car parking. The retail unit at ground floor level is vacant and the retail bar, whilst occupied, offers very limited active frontage.
- 6.5 The public realm surrounding the Site is generally in a poor state of repair and there is a considerable amount of antisocial behaviour in the vicinity of the Site. Accordingly there is significant opportunity for the redevelopment of the existing buildings and improvements to the surroundings.
- 6.6 The intention is to strip back the existing building to first floor slab level but to retain the existing structure and then rebuild from first floor slab level upwards and provide useable ground floor floorspace and frontage along Kentish Town Road.
- 6.7 The proposed building will accommodate both office (Class B1) and residential (Class C3) uses at upper levels. The proposed office element will be ground, plus four upper floors. The top floor will be set back from the building line to provide a terrace area. The residential building is proposed to be ground plus three storeys.
- 6.8 The main office entrance and core will be located to the south of the widened route through the building at ground floor level. The office occupier will have access to private roof terraces at third floor and roof levels, where the massing of the building has been cut back. The office floorplates proposed are small and flexible and will therefore be suitable to accommodate small and medium sized enterprises (SMEs).
- 6.9 The six intermediate affordable housing units (Class C3) will be located in the southernmost part of the building and will have their own dedicated entrance accessed directly off Kentish Town Road.
- 6.10 The infilled floorspace at ground floor level north of the office core will offer flexible retail, restaurant and/or café uses (Class A1 and/or A3) suitable for small and independent retailers. The units to the south of the office core will be flexible retail, restaurant, café and/or leisure uses (Class A1, A3 and/or D2). The Class D2 use

could be a gym, for example.

- 6.11 The cycle parking spaces for the development will be located in a cycle store at mezzanine level above the car parking spaces that are to be retained and will be accessed from the rear of the development adjacent to the car parking entrance, via a dedicated platform lift and stair with associated bike ramp.
- 6.12 Plant will be distributed evenly throughout the building, with a UKPN substation being provided at ground floor level within the car parking area.
- 6.13 It is proposed that the building will be serviced off street as per the existing servicing arrangements.
- 6.14 Specifically, the proposals provide the following benefits:
- Regenerate and transform the existing area;
  - Sustainable reuse and regeneration of an underutilised building;
  - Provision of 6 much needed affordable homes (100% of Camden's affordable housing requirement);
  - Provision of up to 450 new jobs;
  - Provision of new active public uses at ground floor level to reactivate street frontages with a mix of shops, restaurants and cafes and leisure uses;
  - Activate 99m of street frontage (versus 18m existing);
  - High quality and attractive design, embracing the principles of sustainable design and construction;
  - Better building energy use through installation of modern and efficient facilities and systems;
  - Improvement to the surrounding public realm, widening of the route through the site and provision of new street trees; and
  - Creation of a safe and secure environment for existing and future residents, employees and visitors.

## **7 Planning Policy Framework**

- 7.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Statutory Development Plan unless material considerations indicate otherwise.
- 7.2 Planning policy operates at national, regional and local levels. At a national level, Central Government adopted the National Planning Policy Framework (NPPF) in July 2018. The statutory development plan for the Site comprises at a regional level the London Plan (Consolidated with Alterations since 2011) (March 2016), and at the local level the Camden Local Plan (July 2017).

### **National Guidance – The National Planning Policy Framework (NPPF), July 2018**

- 7.3 Ministry of Housing, Communities and Local Government published the revised National Planning Policy Framework on 24 July 2018. This is the first revision of the National Planning Policy Framework since 2012.
- 7.4 The NPPF sets out the Government's economic, environmental and social planning policies for England. It summarises, in a single document, all previous national planning policy advice (contained within PPG and PPS). Taken together, these policies articulate the Government's vision of sustainable development, which should be interpreted and applied locally to meet local aspirations.
- 7.5 The document also sets out the Government's requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. It provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.

### **Planning Practice Guidance (PPG) (March 2014)**

- 7.6 In March 2014, the Department for Communities and Local Government (DCLG) launched the web-based Planning Practice Guidance (PPG) resource. This aims to provide guidance which is useable in an up-to-date and accessible manner. With

regard to decision taking, the PPG is a material consideration in the determination of planning applications.

### **Regional Planning Policy – The London Plan (consolidated with alterations since 2011) (2016)**

- 7.7 The London Plan is the overall strategic plan for Greater London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20–25 years. The London Plan forms the London-wide policy context within which the boroughs set their local planning agendas and forms part of the Statutory Development Plan.
- 7.8 In March 2016 the Mayor published Minor Alterations to the London Plan (MALPs) to align the London Plan with the national housing standards as set out in the Housing Standards Policy Transitional Statement and national car parking.
- 7.9 The following GLA Supplementary Planning Guidance documents are also material considerations:
- Affordable Housing and Viability (August 2017);
  - Housing (March 2016);
  - Town Centres (July 2014);
  - Accessible London: Achieving an Inclusive Environment (October 2014);
  - Shaping Neighbourhoods: Character and Context (June 2014);
  - Sustainable Design and Construction (April 2014); and
  - The Control of Dust and Emissions during Construction and Demolition (July 2014).

### **Local Planning Policy – Camden Local Plan (2017)**

- 7.10 Camden Local Plan was adopted by London Borough of Camden on 3 July 2017. This replaced the Council's Core Strategy and Development Policies Document.
- 7.11 The following Camden Planning Guidance documents are considered to be of relevance in terms of this application:
- CPG Housing (Interim);

- CPG 2 Housing May 2016 (updated March 2018);
- CPG Amenity;
- CPG Biodiversity;
- CPG Employment Sites and Business Premises; and
- CPG Town Centres.

7.12 Camden Town Underground Station Site SPD (2007) is also of relevance to this application.

### **Emerging Policy**

7.13 Consultation took place on the draft New London Plan between 1 December 2017 and 2 March 2018. The Mayor's Minor Suggested Changes to the London Plan were published on 13 August 2018. Adoption of the plan is targeted for late 2019 / early 2020. Once adopted, this will supersede the current London Plan. However, as the document is in the early stages and is yet to go through the Examination in Public process, limited weight has been given to the draft policies at this stage.

## 8 Land Use

- 8.1 Sections 8 to 15 of this statement examine the planning considerations of relevance to this scheme. Each section sets out the relevant adopted planning policies and other material considerations before assessing each of the key planning considerations in turn.

### Office

- 8.2 The NPPF sets out the Government's commitment to securing economic growth and advises that plans should proactively meet the development needs of businesses and support an economy fit for the twenty first century. Paragraph 80 of the NPPF states that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.
- 8.3 London Plan Policy 4.1 promotes the continued development of a strong, sustainable and increasingly diverse economy across parts of London. It seeks to ensure the availability of sufficient and suitable workspaces in terms of type, size and cost, supporting infrastructure and suitable environments for larger employers and SME's, including the voluntary and community sectors and maximise the benefits from new infrastructure to secure sustainable growth and development.
- 8.4 London Plan Policy 4.2 encourages boroughs to **“support the management and mixed use development and redevelopment of office provision”**. Policy 4.2 (D) specifically supports increases in current stock where there is evidence of sustained demand.
- 8.5 London Plan Policy 4.2 goes on to state that the Mayor will **“consolidate and extend the strengths of the diverse office markets elsewhere in the capital by promoting their competitive advantages, focusing new development on viable locations with good public transport, enhancing the business environment including through mixed use redevelopment, and supporting managed conversion of surplus capacity to more viable, complementary uses”**. It is states that renewal and modernisation of the existing office stock in viable locations to improve its quality and flexibility will be supported. Increases in current stock will

be supported where there is a strategic and local evidence of sustained demand for office-based activities.

- 8.6 Policy E1 of Camden's Local Plan seeks to secure a successful and inclusive economy in Camden by creating the conditions for economic growth. In order to do so they will maintain and support stock suitable for a variety of businesses of differing requirements and sizes. New office development is directed towards growth areas, Central London and Town Centres in order to meet the forecast demand of 695,000sqm of office floorspace between 2014 and 2031.
- 8.7 Policy E2 seeks to protect existing employment premises but also supports the delivery of higher intensity redevelopment of premises or sites suitable for continued business use provided that the following criteria are met:
- The level of employment floorspace is increased or at least maintained;
  - The redevelopment retains existing businesses on the site as far as possible;
  - Relocation of any businesses will not harm the local economy;
  - The proposed premises are suitable for start-ups and SMEs, such as managed affordable workspace where viable;
  - The scheme would increase employment opportunities for local residents, including training and apprenticeships; and
  - The scheme includes other priority uses such as housing, affordable housing and open space where relevant.

## **Assessment**

- 8.8 The Site sits within Camden Town Centre, within close proximity to the existing Camden Town underground station and even closer proximity to the forthcoming Camden Town underground station entrance/exit on Buck Street. The Site has a PTAL rating of 6b (the highest possible level). Accordingly, in this location, the provision of additional and improved office accommodation is supported by policy at all levels.
- 8.9 The existing office floorspace is out-dated, of a poor quality and no longer fit for purpose. It is proposed to enhance the quality and increase the quantum of floorspace to create Grade A floorspace throughout; this will consolidate and



improve the area's business offer as well as enhance London's strategic competitiveness, in line with London Plan Policy 4.2.

- 8.10 The proposals seek to maximise the Site's capacity for employment provision and provide an additional 2,447sqm GIA of office (Class B1) floorspace in accordance with the London Plan and Policies E1 and E2 of Camden's Local Plan. The provision of this additional floorspace will help to meet the demand for office floorspace within Town Centres as specified within Camden's Local Plan Policy E1.
- 8.11 The floorspace is proposed to be flexible in nature so that it can meet modern office occupier requirements. The regular rectangular floorplates make the commercial floorspace of the development easily divisible to appeal to a range of potential occupiers, including SMEs. This will also allow the building to be adapted in the future in order to meet changing market and occupier requirements, ensuring that it is future proofed. Offering flexibility is considered paramount to appealing to a range of occupiers and is required in order to attract a variety of different types and sizes of business.
- 8.12 The proposals will replace and substantially exceed the existing employment floorspace currently provided within the existing buildings. Given the scheme is an office-led development, it will create a significant number of jobs both during construction and once occupied and operational. Once constructed the total number of jobs that will be generated by the office (Class B1) floorspace will be up to 430 jobs (note – this assumes an average employment density across the employment floorspace of 1:12). The construction period of the scheme will generate a further 89 FTE jobs during the life of the demolition and construction.
- 8.13 The Proposed Development is considered to directly respond to the challenges, aims and objectives of planning policy, including helping to deliver against employment demand and growth requirements, in a key Town Centre location, where demand for employment floorspace will continue to grow with the forthcoming Camden Town underground station entrance/exit on Buck Street. The proposals will support a stronger and more diverse business base with the provision of modern, flexible floorplates which respond directly to the London Plan and local policy level requirements.

- 8.14 The offices proposed will benefit from the provision of external amenity space as a result of setbacks at third floor and roof levels, providing private amenity space for the office occupiers, encouraging wellness, in line with Camden Local Plan Policy A2.
- 8.15 The Development Proposals include an extensively planted 141sqm garden terrace at the third floor. The garden provides a refuge for the office users with opportunities for outdoor seating, informal meeting and relaxation within an overriding presence of a green background. The dense planting with various multi-stem ornamental trees will create a lush environment that will be from the street and in turn enhance views within the wider setting.
- 8.16 At the fourth floor level, the set back office space provides a 675sqm timber decked terrace for use by the office occupiers. To improve amenity and enhance privacy large box planters are located around the perimeter of the deck area to provide a continuous green filter which reinforces the distinctive linear space. The planting selection responds to the senses, sight and smell, as well as attracting wildlife. The planter has been coordinated with the structure to ensure the planting can be delivered.
- 8.17 Further details of the benefits of the employment floorspace can be found in the Regeneration Statement prepared by Quod and submitted as part of the Application.
- 8.18 The enhancement and intensification of the exiting office floorspace is entirely compliant with the aims of the NPPF, London Plan and Local Plan policies.

### **Town Centre Uses**

- 8.19 Town centres provide a competitive choice of goods and services accessible to all Londoners. Together with Neighbourhood Centres, Town Centres provide a sense of place and identity within the capital. The government recognises the importance of ensuring the vitality of town centres is protected and enhanced. Paragraph 85 of the NPPF states that **“planning decisions should support the role that town centres play at the heart of local communities by taking a positive approach to their growth, management and adaption”**.

- 8.20 In pursuance of this policy aspiration planning policies should allow Town Centres to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries.
- 8.21 London Plan Policy 2.15 advises that outside of the Central Activities Zone (CAZ) Town Centres should be the main focus of commercial development and intensification.
- 8.22 Policy 2.15 advises that development proposals within Town Centres should aim to:
- sustain and enhance the vitality and viability of the centre;
  - accommodate economic and/or housing growth through intensification and selective expansion in appropriate locations;
  - support and enhance the competitiveness, quality and diversity of town centre retail, leisure and other consumer services;
  - be in scale with the centre;
  - promote access by public transport, walking and cycling;
  - promote safety, security and ‘lifetime neighbourhoods’;
  - contribute towards an enhanced environment, urban greening, public realm and links to green infrastructure; and
  - Reduce delivery, servicing and road users’ conflict.
- 8.23 London Plan Policy 4.7 seeks to support a strong approach to assessing need and bringing forward capacity for retail development in Town Centres. The scale of retail should be related to the size, role and function of a Town Centre and its catchment.
- 8.24 In addition, London Plan Policy 4.8 seeks to support a successful and diverse retail sector.
- 8.25 Camden Local Plan Policy TC1 advises that the Council will promote the delivery of significant additional provision of retail in Camden Town Centre. The Camden Retail and Town Centre Study 2013 indicates a need for around 30,000sqm of new retail floorspace in the borough by 2031, in addition to that to be provided at King’s Cross and St Pancras.
- 8.26 Camden Local Plan Policy TC2 states that the Council will **“promote successful**

**and vibrant centres throughout the borough to serve the needs of residents, workers and visitors”.**

- 8.27 In pursuance of this, Camden Local Plan Policy TC2 states that the Council will protect and enhance the role and unique character of Camden’s centres by inter alia providing and maintaining a range of shops, including independent shops, services, food, drink and entertainment and other suitable uses to provide variety, vibrancy and choice.
- 8.28 TC2 (g) states that the Council will protect secondary frontages as locations for shops (Class A1) together with a broader range of other town centre uses to create centres with a range of shops, services, and food, drink and entertainment uses which support the viability and vitality of the centre.
- 8.29 The objective of Camden Local Plan Policy TC4 is to ensure that the development of Town Centre uses does not cause harm to the character, function, vitality and viability of the centre or the amenity of neighbours. In assessing development proposals for new Town Centre uses, the Council will consider, inter alia, the effect of development on shopping provision and the character of the centre in which it is located; the Council’s expectations for the mix and balance of uses within frontages; impacts on small and independent shops and markets; the impact of the development on nearby residential uses and amenity and the potential for antisocial behaviour.
- 8.30 Appendix 4 of the Camden Local Plan sets out the Council’s aspirations for the mix of Town Centre uses within the borough. In order to ensure the vitality and viability of the Town Centre a minimum of 50% Class A1 retail use floor space should be provided along secondary frontages within Camden Town Centre.
- 8.31 Camden Local Plan policies should be read in conjunction with the Camden Planning Guidance (CPG) ‘Town Centres and Retail (2018)’ which provides detailed centre specific guidance on how the Council will implement policies for Town Centres. It advises that the secondary frontages within Camden Town Centre have a varied character and range of uses. With regard to Town Centres outside of central London, the key message set out within the CPG is that the Council **“will protect the shopping function of [its] Town Centres by ensuring there [are] a**

**high proportion of premises in retail use”.**

- 8.32 Camden Local Plan Policy TC5 advises that LBC will promote the provision of small shop premises suitable for small and independent businesses. In pursuance of this Camden will encourage the occupation of shops by independent businesses and the provision of affordable premises.

**Assessment**

- 8.33 The Site sits within a secondary frontage within Camden Town Centre. The existing building has very limited uses at ground floor level and therefore currently contributes very little to the street and activity at street level. The Proposed Development therefore offers a significant opportunity to enhance and intensify the provision of Town Centre uses within Camden Town to improve its offer and competitiveness.
- 8.34 The Proposed Development seeks to provide 263sqm (GIA) of flexible retail and restaurant/café (Class A1 and/or A3) uses within the 10 double height units north of the office core. These units are circa 20sqm each making them suitable for small and independent retailers, and due to their size, inherently more affordable, in line with planning policy. These units could also be amalgamated if an occupier wanted to take a greater amount of frontage and detail on how this could work is provided within the Design and Access Statement submitted with the Application.
- 8.35 The Proposed Development would provide 275sqm (GIA) of flexible retail, restaurant/café and/or leisure (Class A1, A3 and/or D2) uses within the units south of the office core. These units are slightly larger and again opportunities exist for amalgamation to meet occupier requirements. In light of the changing and challenging retail context, the inclusion of leisure (Class D2) use, for a gym for example, as one of the flexible uses within the southern units seeks to provide a greater range of flexibility within the proposed uses, with the intention of ensuring the attractiveness of the ground floor Town Centre uses to occupiers in the future.
- 8.36 The range of unit sizes proposed, and the possibilities for amalgamation and subdivision provide flexibility to respond to occupier requirements at the point of

delivery.

- 8.37 The scheme layout maximises activity at street level along Kentish Town Road and delivers 99m of active frontage and an animated street scene, versus 18m of existing fairly inactive and poor quality street frontage.
- 8.38 It is considered that the active uses will offer convenience for the local user, but also for visitors and tourists, which reflects the Site's location within Camden Town Centre. The ground floor uses will also provide passive surveillance helping to reduce the level of anti-social behaviour within the area and improve the safety and quality of the ground level external environment.
- 8.39 A letter from the retail agents has been submitted as part of Application which confirms the market interest and support for the Town Centre uses forming part of the Proposed Development. The Knight Frank commentary concludes that current tenant interest in Camden strongly supports the delivery of retail scheme as set out within the Development Proposals. The commentary supports the flexibility of the smaller retail units and advises that provision should be made to allow the units to be let individually or in combination to meet occupiers' optimum size requirement. The report also advises that in the same regard, provision should be made within the larger units to provide flexibility and accommodate subdivision if required.
- 8.40 A strict operational and management policy would be put in place for dealing with such considerations as refuse handling, goods deliveries, maintenance and cleaning.
- 8.41 The Town Centre uses that form part of the Application are appropriate to this Town Centre and secondary frontage location. The proposals will enhance and transform this Central London Site by providing an active ground floor frontage. The proposed units will appeal to a broad cross section of end users including Class A1, A3 and/or D2 leisure uses. On this basis the proposals support the London Plan and Camden Local Plan objectives of providing enhanced retail offer within Camden Town Centre.

## Mixed Use

- 8.42 The NPPF encourages mixed use developments in order to promote social interaction and to encourage multiple benefits from land.
- 8.43 Policy 4.3 of the London Plan states that for areas outside of the Central Activities Zone (CAZ) and the Isle of Dogs Opportunity Area, mixed use redevelopment should support consolidation and enhancements to the quality of the remaining office stock in the types of strategically specified locations identified in paragraph 4.12. Paragraph 4.12 identifies viable locations as, amongst other things, being town centre based office quarters and locally oriented town centre based office provision, which can be consolidated effectively to meet local needs, or where necessary, changed to other uses.
- 8.44 A key aim of Camden's Local Plan, in particular Policy H1, is to maximise housing supply within the Borough. In order to achieve this, Policy H2 of the Local Plan requires that where non-residential development is proposed, the Council will promote the inclusion of self-contained homes as part of a mix of uses, across the Borough.
- 8.45 Within Camden Town Centre, where development involves additional floorspace of more than 200sqm (GIA), Policy H2 requires 50% of all additional floorspace to be provided as self-contained housing, taking into account a number of considerations as follows:
- a) the character of the development, the site and the area;
  - b) site size, and any constraints on developing the site for a mix of uses;
  - c) the priority the Local Plan gives to the jewellery sector in the Hatton Garden area;
  - d) whether self-contained housing would be compatible with the character and operational requirements of the proposed non-residential use and other nearby uses; and
  - e) whether the development is publicly funded or serves a public purpose.
- 8.46 Where housing is required as part of a mix of uses, Camden will seek the housing to be provided on-site, particularly where 1,000sqm (GIA) of additional floorspace or



more is proposed. Where the Council is satisfied that providing on-site housing is not practical or housing would be more appropriately be provided off-site, Camden will seek provision of housing on an alternative site nearby, or exceptionally a Payment-In-Lieu (PIL).

8.47 Policy H2 of the Local Plan sets out that in considering whether housing should be provided on site, the most appropriate mix of housing and other uses, the Council will take in to account:

- f) the need to add to community safety by providing an active street frontage and natural surveillance;
- g) the extent of any additional floorspace needed for an existing user;
- h) the impact of a mix of uses on the efficiency and overall quantum of development;
- i) the economics and financial viability of the development including any particular costs associated with it, having regard to any distinctive viability characteristics of particular sectors such as build-to-let housing; and
- j) whether an alternative approach could better meet the objectives of this policy and the Local Plan.

8.48 The policy sets out that where the site is in a Town Centre, and the housing provision falls below 50%, due to viability, and there is a prospect of viability improving prior to complete, the Council will seek a deferred contingent contribution.

### **Assessment**

8.49 It is proposed to create a mixed use development, comprising of office, residential and flexible town centre uses. The proposed development increases the gross internal floorspace on site by 3,079sqm through the infilling of the ground floor and extension of the building. The scheme therefore triggers a requirement to provide housing under Policy H2 of Camden's Local Plan.

8.50 Policy H2 requires the provision of up to 50% of the total additional floorspace to be provided as housing. If housing cannot be achieved on site, a contribution to off-site housing may be considered. In exceptional circumstances the Council may accept a PIL. In line with Policy H2, the self-contained housing requirement would be

1,540sqm (GIA), under Policy H4, this would generate an affordable housing contribution of 462sqm (GIA) or 30%. The Proposed Development is for 476sqm (GIA) of housing (all of which is proposed as affordable) to be provided on Site.

- 8.51 From the outset, the project team examined the potential for the maximum quantum of housing to be provided on-Site in accordance with Policy H2. However, following this exercise, it was considered that the policy compliant amount of self-contained housing cannot practically be delivered on-Site having regard to Policy H2 criteria parts (h), (i) and (j), set out below. Please note that (f) and (g) have not been considered further as they are not relevant to this scheme.
- 8.52 The Financial Viability Assessment (FVA) prepared by Savills, and submitted with this Application, concludes that given that the Residual Land Value generates a deficit against the Site Value Benchmark, the scheme is not considered viable. Notwithstanding the financial deficit, the Applicant is committed to providing affordable housing in the Borough and on that basis the scheme incorporates the policy compliant level of intermediate affordable housing. The conclusions, having regard to the criteria of Policy H2, are summarised below.

**Criterion H (i.e. the impact of a mix of uses on the efficiency and overall quantum of development)**

- 8.53 Sainsbury's have an operational customer car park at basement level, which must continue in operation during the construction works and which restricts all proposed works to ground floor and above. The proposals retain the existing structure and then rebuild from first floor slab level upwards.
- 8.54 For this reason, there is very limited load that the existing structure can take without causing disruption to Sainsbury's car park at basement level. This, along with Rights of Light and daylight and sunlight restrictions, in respect of the residential buildings to the rear, as well as townscape considerations, limit the height of the building. It is considered that the proposed building height and massing forms the maximum building envelope for the Site in the context of these constraints.
- 8.55 Furthermore, the provision of an additional residential core, for private residential housing, would severely impact on the viability of the scheme. In any event, an

additional lift accessed core would not be feasible, due to the works that would be required at basement level for the lift pits and the associated impact on Sainsbury's car park. Therefore both in terms of viability and in practical delivery terms, the level of on-Site housing has been maximised.

- 8.56 If the proposals were to provide the policy compliant level of self-contained housing, on-Site, there would be a very marginal increase in commercial floorspace as part of the scheme. The increase in commercial floorspace would be so marginal that it would not make the scheme worthwhile for the Applicant and would not be delivered.
- 8.57 The proposed quantum and mix of uses is considered to be the maximum the Site can deliver whilst also being the most appropriate in terms of efficiency of the Site and in achieving the competing policy objectives.

**Criterion 1 (i.e. the economics and financial viability of the development including any particular costs associated with it, having regard to any distinctive viability characteristics of particular sectors such as build-to-let housing)**

- 8.58 A detailed FVA has been prepared by Savills to assess the potential to include the Policy H2 target self-contained housing level. The FVA is submitted as part of the Application.
- 8.59 The FVA robustly demonstrates that the Residual Land Value generates a deficit against the Site Value Benchmark, and accordingly the scheme is not considered viable. Notwithstanding the financial deficit, the scheme incorporates affordable housing, as the Applicant is committed to delivering affordable housing within the Borough.
- 8.60 In the current market, if a developer was buying a site such as the Application Site, they would normally seek a return of 20% Profit on Gross Development Value (GDV) in order to justify the risk of delivering the scheme, where no pre-lets, pre-sales or forward funding deals, are in place. However, in this instance, the Applicant has assumed that the commercial element of the scheme will be pre-let given the quantum and nature of the space. The Applicant has also assumed that the

affordable housing element will be pre-sold to a Register Provider (RP), and has engaged Gerald Eve LLP, as affordable housing experts, to advise on this. Accordingly, the Profit on GDV has been adjusted accordingly. On the basis that both elements have been de-risked, the Applicant has adopted a lower Profit on GDV of 17.5% for the commercial element and 6% for the affordable housing element.

- 8.61 BPS, the Council's independent viability consultants, consider that the maximum reasonable amount of self-contained housing is being provided as part of the proposals.

**Criterion J (i.e. whether an alternative approach could better meet the objectives of this policy and the Local Plan)**

- 8.62 In terms of other planning objectives, there is a need for new employment floorspace within Camden. The proposed scheme would create 5,254sqm (GIA) of new employment floorspace (approximately 2,447sqm (GIA) of net additional floorspace), generating up to 430 jobs.
- 8.63 The Site is also located within a Town Centre and secondary shopping frontage. Accordingly, the Proposed Development proposes 263sqm (GIA) of flexible retail and restaurant/café uses within Class A1 and/or A3, and 275sqm (GIA) of flexible retail, restaurant /café and leisure uses within Class A1 and/or A3 and/or D2, which will also create new jobs.
- 8.64 In addition, approximately 476sqm (GIA) of on-site affordable housing, delivering 6 intermediate affordable housing units, is proposed. 100% of the housing units to be provided are to be affordable housing units.
- 8.65 The proposed mixed-use development is considered to accord with the themes of the NPPF, the London Plan and more specifically Camden's Local Plan mixed use policy requirements.

**Residential**

- 8.66 Paragraph 59 of the NPPF (2018) states **“to support the Government's objective**

of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay”.

- 8.67 Paragraph 60 states **“to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for”**.
- 8.68 In addition to this, paragraph 61 notes that **“within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes)”**.
- 8.69 Housing provision is a key priority of the London Plan (2016), and Policy 3.3 sets an annual housing target for the city of 42,000 net additional homes. Furthermore, this policy seeks to increase housing supply and states that **“the Mayor recognises the pressing need for more homes in London in order to promote opportunity and provide a real choice for all Londoners in ways that meet their needs at a price they can afford”**.
- 8.70 Table 3.1 of the London Plan subsequently sets out housing targets for each borough for the period 2015-2025. The annual average housing supply monitoring target for Camden is 889 units. Part E of Policy 3.3 outlines that this development capacity should be realised through the **“intensification of brownfield land; town centre renewal; opportunity and intensification areas and growth corridors; and mixed use redevelopment, especially of surplus commercial capacity”**.
- 8.71 London Plan Policy 3.8 relates to housing choice. It states that **“Londoners should**

**have a genuine choice of homes that they can afford and which meet their requirements for different sizes and types of dwellings in the highest quality environments.” The policy states that “taking account of the housing requirements at all levels, Boroughs should ensure that new developments offer a range of housing choices, in terms of the mix of housing sizes and types, taking account of the housing requirements of different groups and the changing roles of different sectors in meeting these”.**

- 8.72 Camden Local Plan Policy H1 seeks to secure a sufficient supply of homes and seeks to maximise the supply of housing. The target for new homes has been increased to 16,800 additional homes from 2015/16-2030/31, including 11,130 additional self-contained homes.
- 8.73 Camden Local Plan Policy TC2 supports the development of housing within centres and Central London including above and below shops where this does not prejudice town centre function.
- 8.74 As set out above, Policy H2 of Camden’s Local Plan seeks to maximise the supply of self-contained homes as part of a mix of uses and will seek residential accommodation in development proposals where the total gross floorspace increases by more than 200sqm (GIA) and will require 50% of all additional floorspace to be self-contained housing.

### **Assessment**

- 8.75 Having undertaken a detailed Financial Viability exercise with regard to the provision of housing on-Site, it was concluded that the policy compliant amount of housing cannot viably or practically be delivered following the criteria in Policy H2. The optimal solution is for all of the residential floorspace being delivered to be affordable, affordable housing being the priority within the Borough. Accordingly, a total of 6 affordable housing units are provided which is the policy compliant level of affordable housing and is supported by planning policy at all levels.

### **Affordable Housing**

- 8.76 Paragraph 20 of the NPPF sets out the strategic policies and identifies that sufficient

provision should be made for housing, including affordable housing. In this context, Paragraph 61 states that housing should be provided for different groups in the community including those who require affordable housing. Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required and expect it to be met on-site unless specific criteria can be met.

- 8.77 London Plan Policy 3.11 states that across London the target is to provide on average 17,000 more affordable homes per year over the plan period. 60% should be for social rent/affordable rent and 40% for intermediate rent or sale.
- 8.78 London Plan Policy 3.12 states that the maximum reasonable amount of affordable housing should be sought when negotiating on individual private residential and mixed use schemes.
- 8.79 When deciding the maximum reasonable amount of affordable housing, the following should be taken into account:
- Current and future requirements for affordable housing at local and regional levels identified in line with Policies 3.8, 3.10 and 3.11;
  - Affordable housing targets adopted in line with Policy 3.11;
  - The need to encourage rather than restrain residential development;
  - The need to promote mixed and balanced communities (Policy 3.9);
  - The size and type of affordable housing needed in particular locations; and
  - The specific circumstances of individual sites.
- 8.80 Policy 3.13 of the London Plan states that affordable housing will be required on sites which have the opportunity to provide 10 or more homes on-site, applying density guidance set out in Policy 3.4 of the London Plan.
- 8.81 Camden Local Plan Policy H4 states that the Council will aim to maximise the supply of affordable housing and exceed the borough wide strategic target of 5,300 additional affordable homes from 2016/17 – 2030/31 and will aim for an appropriate mix of affordable housing types to meet the needs of households unable to access market housing.



- 8.82 Policy H4 identifies that the Council expect a contribution to affordable housing from all developments that provide one or more additional homes and involve a total addition to residential floorspace of 100sqm GIA or more.
- 8.83 Policy H4 goes on to state that for developments with a capacity for fewer than 25 additional homes, a sliding scale target applies starting at 2% for one home and increasing by 2% for each home added to capacity. Part (h) of the policy states that for development with capacity for 10 or more additional dwellings, the affordable housing should be provided on site or, when it cannot be provided on site, or off site provision would create a better contribution, the Council may accept provision of affordable housing off-site in the same area, or exceptionally a PIL.
- 8.84 Policy H4 sets out that the guideline mix of affordable housing types is 60% social rented housing and 40% intermediate housing.

### **Assessment**

- 8.85 The calculation for affordable housing is based upon the self-contained housing requirement of Policy H2 of Camden's Local Plan. In line with Policy H2, the self-contained housing requirement would be 1,540sqm (GIA). Under Policy H4, and the sliding scale (as the capacity is for less than 25 homes) this would generate an affordable housing contribution of 462sqm (GIA) or 30%.
- 8.86 In line with Policy H4 of Camden's Local Plan, all of the housing forming part of the Proposed Development is affordable housing. The scheme provides 476sqm (GIA) of affordable housing (Class C3), within a separate dedicated building at the south of the Site. The policy compliant affordable housing floorspace requirement is 462sqm. Accordingly the Proposed Development provides more than 100% of the policy required level of affordable housing floorspace on-Site. This equates to 6 affordable housing units.
- 8.87 Whilst Policy H4 of Camden's Local Plan requires the affordable housing tenure split to be 60% social rented and 40% intermediate, the Proposed Development will provide 100% intermediate. The FVA submitted with this Application robustly demonstrates that the proposed scheme, based on the values provided, is the maximum reasonable level of housing and affordable housing that can be proposed.

Accordingly, it is not possible to viably provide the tenure split set out within Policy H4, within this scheme.

- 8.88 The proposed quantum of affordable housing is in accordance with National, Regional and Local Planning Policy as it provides more than 100% of the required level of affordable housing on Site as well as the maximum reasonable amount and contributes towards the National, Regional and Local shortage in affordable housing generally.

## 9 Residential Design

- 9.1 This section considers the technical design of the proposed residential units, including unit mix, unit sizes, private amenity space, accessibility, and aspect and privacy. This section does not consider the external design of the building which is considered within Section 10.

### Unit Mix

- 9.2 NPPF paragraph 61 notes that **“within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes)”**.
- 9.3 The objective of London Plan Policy 3.8 is inter alia to ensure that development delivers an appropriate mix of house sizes and tenures to meet identified needs within London. In pursuance of this policy objective new development should **“offer a range of housing choices, in terms of the mix of housing sizes and types, taking account of the housing requirements of different groups and the changing roles of different sectors in meeting these”**.
- 9.4 Further to this London Plan Policy 3.9 advises that **“a more balanced mix of tenures should be sought in all parts of London, particularly in some neighbourhoods where social renting predominates and there are concentrations of deprivation”**.
- 9.5 The Mayor’s Housing SPG sets out the need for different unit sizes in private, affordable or mixed residential schemes. The SPG only sets out strategic London wide requirements and does not set targets for individual sites. The SPG recognises that housing should be appropriate to context and constraints within a particular site and that the requirement for units of different sizes varies widely between local areas.
- 9.6 In considering the mix of uses and the appropriate contribution to the housing supply

in Camden, the strategic aim of the Council is to ensure that a variety and mix of housing is provided in the Borough to suit the widely differing social and economic needs of residents.

9.7 Policy H7 of Camden's Local Plan states that the Council will aim to secure a range of homes of different sizes that will contribute to creation of mixed, inclusive and sustainable communities and reduce mismatches between housing needs and existing supply. In order to do this the Council will ensure that all housing developments contribute to meeting the priorities set out in the Dwelling Sizes Priorities Table and include a mix of large and small homes. The Council will take a flexible approach to assessing the mix of dwelling sizes proposed in each development.

9.8 At supporting paragraph 3.189 Camden's Dwelling Size Priorities for intermediate housing are as follows:

1-bedroom (or studio)	2-bedroom	3-bedroom	4-bedroom (or more)
High	Medium	Lower	Lower

Table 2: Camden's Dwelling Size Priorities Table (Table 1 of Camden's Local Plan)

## Assessment

9.9 The proposed dedicated residential building will provide the following residential units:

Unit Type	No. Persons	Unit Size	Total Units
Studio	1B / 1P	41sqm	1
1 Bed	1B / 2P	51sqm	2
2 Bed	2B / 4P	72-75sqm	3
Total Units			6

Table 3: Proposed Residential Unit Mix and Unit Sizes

9.10 The affordable housing units will be located on the first to third floors of the

residential building above the ground floor active uses and will be accessible by lift as well as stair. Two affordable housing units will be provided per floor.

- 9.11 The mix of housing proposed will provide housing for a variety of household types ranging from single persons in the studio through to couples and potentially families or sharers in the two bedroom units, in line with housing need.

### **Unit Size**

- 9.12 Previous London Housing Design Guide and Lifetime Homes guidance documents have been replaced by the London Plan Housing Supplementary Planning Guidance (March 2016) and the Housing Standards Minor Alterations to the London Plan (March 2016). According to the new guidance, the proposed residential layouts are required to meet the following space standards:

- The Technical Housing Standards (March 2015); and
- Building Regulations requirements M4(2) and M4(3).

- 9.13 At the local level Camden Local Plan Policy H6 requires all homes to meet the nationally described space standards.

### **Assessment**

- 9.14 The proposed residential units have been designed and planned to comply with the requirements set out within the London Housing Design Guide / National Technical Standards and Building Regulations.
- 9.15 Due to the number of units being proposed, there is only a requirement to comply with Building Regulations M4(1) which is confirmed within the Application submission.
- 9.16 The minimum space standards set out at London Plan Policy 3.5 are comfortably met.

## Amenity Space

- 9.17 Camden Local Plan Policy A2 Open Space seeks to protect and enhance access to open space and green infrastructure within the borough. Policy A2 (m) states that new development proposals within the London Borough of Camden will be required to provide 9 sqm per occupant for residential schemes, while taking into account any funding for open spaces through the Community Infrastructure Levy.
- 9.18 Policy A2 (n) states that priority will be given to **“securing new public open space on-site, with provision off-site near to the development only considered acceptable where provision on-site is not achievable. If there is no realistic means of direct provision, the Council may accept a financial contribution in lieu of provision”**.
- 9.19 The Camden Open Space CPG (2018), paragraph 1.6 sets out the circumstances where development will be required to contribute towards open space and play facilities. Only residential schemes which propose 11 or more additional dwellings or exceeds 1,000sqm (gross internal area) are required to make a contribution towards open space and play facilities.
- 9.20 The Camden Housing CPG (2018) Chapter 4 also refers to the Mayor’s Housing SPG (2016) Standard 26 and 27 which requires a minimum of 5sqm of private outdoor space per one-two person unit with an extra 1sqm per additional occupant. Minimum depth and width for private amenity space is 1500mm.

## Assessment

- 9.21 As set out above, there is no requirement for open space in respect of the residential element of the Proposed Development.
- 9.22 Each of the residential units proposed will have its own external private amenity space in the form of a balcony. Some of the balconies face onto the rear of the building, with one of the balconies (for the top floor 2 bedroom flat) fronting on to Kentish Town Road.
- 9.23 The balconies proposed meet the requirements of the Mayor’s Housing SPG in

terms of size, including depth and width. Therefore the proposed private amenity space will be provided in accordance with regional and local planning policy.

- 9.24 Accordingly, the amenity space for the residential units is acceptable.

### Privacy

- 9.25 Policy 7.6 (d) of the London Plan seeks to ensure that developments do not cause unacceptable harm to the amenity of residential buildings in relation to privacy and overshadowing.
- 9.26 In relation to new housing development, Standard 28 of the Mayor's Housing SPG requires habitable rooms within each dwelling to be provided with an adequate level of privacy in relation to neighbouring property, the street and other public spaces.
- 9.27 Supporting paragraph 2.3.36 of the Mayor's Housing SPG states that designers should consider the position and aspect of habitable rooms, gardens and balconies, and avoid windows facing each other where privacy distances are tight. The SPG states that in the past, planning guidance for privacy has been concerned with achieving visual separation between dwellings by setting a minimum distance of 18 – 21m between facing homes (between habitable room and habitable room as opposed to between balconies or terraces or between habitable rooms and balconies/terraces). The SPG states that these can still be useful yardsticks for visual privacy, but adhering rigidly to these measures can limit the variety of urban spaces and housing types in the City, and can sometimes unnecessarily restrict density.
- 9.28 At the local level, Camden Local Plan Policy A1 advises that the Council seek to protect the quality of life of occupiers and neighbours. In doing so, they will grant permission for development unless this causes unacceptable harm to amenity. In achieving this, the Council will consider the impact development proposals would have on visual privacy and outlook.
- 9.29 The Camden Amenity CPG paragraph 7.4 advises that **“development should be designed to protect the privacy of both new and existing dwellings to a reasonable degree. Spaces that are overlooked lack privacy. Therefore, new**

**buildings, extensions, roof terraces, balconies and the location of new windows should be carefully designed to avoid overlooking”.**

### **Assessment**

- 9.30 The existing building is currently used as offices on the upper levels. The proposed buildings will, similarly, be used as an office on the upper levels. The proposed new residential building infills an existing gap between the buildings at upper levels.
- 9.31 The Mayor’s Housing SPG focuses on overlooking into and from new residential properties, and does not set out requirements for overlooking between commercial spaces and existing residential. Nonetheless, the scheme has been designed to limit the impact on surrounding residential properties and avoid direct overlooking as far as possible.
- 9.32 The proposed office building fronts onto Kentish Town Road and overlooks Sainsbury’s servicing area to the rear. Whilst Grand Union Walk residential units are located to the north of the Site, they do not have any rear windows. Accordingly, there are no opportunities for overlooking from this building.
- 9.33 Barnes House is located to the rear of the residential building and contains residential accommodation. The proposals have been designed to ensure that significant distances are maintained between the two buildings. Similarly, consideration has been given to the angles of the buildings to limit any possibility of overlooking.

### **Aspect**

- 9.34 Standard 28 in the Mayor’s Housing SPG states that design proposals should demonstrate how habitable rooms within each dwelling are provided with an adequate level of privacy in relation to neighbouring property, the street and other public spaces.
- 9.35 Standard 29 of the Mayor’s Housing SPG requires dual aspect units wherever possible. In particular, the Housing SPG states that north facing single aspect units which are exposed to significant noise levels or which contain three plus bedrooms



should be avoided.

- 9.36 Camden Local Plan, at paragraph 7.32, states that all residential developments are required to be designed and built to create high quality homes. The Council will seek to ensure that residential development, both new build and change of use, is dual aspect except in exceptional circumstances.

### **Assessment**

- 9.37 All of the proposed residential units are dual aspect. Accordingly, the proposals are considered to accord with policy at all levels.

## 10 Design, Heritage and Visual Impact

- 10.1 This section considers the design, heritage and visual impact matters at the Site. It should be read alongside the Townscape and Visual Impact Assessment and Heritage Statement both produced by Ettwein Bridges.

### Design

- 10.2 The Government has attached great importance to the design of the built environment in the NPPF with a presumption in favour of sustainable development.
- 10.3 Paragraph 124 of the NPPF states that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.
- 10.4 Paragraphs 127 of the NPPF states that development should function well and add to the overall quality of the area over the life time of the development. In pursuance of this development should be visually attractive, sympathetic to the local character and context, maintain a strong sense of place and distinctiveness.
- 10.5 While achieving this development should optimise the potential use of the site including delivering an appropriate mix of green and public space. The application of policy should not discourage appropriate innovation or change. Design quality should be considered throughout the evolution and assessment of individual proposals.
- 10.6 Paragraph 4 of the PPG on Design, states that local planning authorities are required to take design in to consideration and should give great weight to outstanding or innovative designs which help to raise the standard of design more generally in the area. It states that **“planning permission should not be refused for buildings and infrastructure that promote high levels of sustainability because of concerns about incompatibility with an existing townscape, if those concerns have been mitigated by good design (unless the concern relates to a designated heritage asset and the impact would cause material harm to the asset or its setting which is not outweighed by the proposal’s**

**economic, social and environmental benefits”.**

- 10.7 Paragraph 15 of the PPG on Design states that that new or changing places should have the following qualities commonly exhibited by successful, well-designed places:
- be functional;
  - support mixed uses and tenures;
  - include successful public spaces;
  - be adaptable and resilient;
  - have a distinctive character;
  - be attractive; and
  - encourage ease of movement.
- 10.8 London Plan Policy 7.1 requires good quality environments to be provided which have the best possible access to services, infrastructure and public transport. It states that the design of new buildings and the spaces they create should help reinforce or enhance the character, legibility, permeability and accessibility of the neighbourhood.
- 10.9 London Plan Policy 7.4 states that development should have regard to the form, function and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It should improve an area’s visual or physical connection with natural features. In areas of poor or ill-defined character, development should build on the positive elements that can contribute to establishing a character for the future function of the area.
- 10.10 In addition, buildings should provide a high quality design response that inter alia, has regard to the pattern and grain of the existing spaces and streets in terms of orientation, scale, proportion and mass. Buildings should contribute to a positive relationship between the urban structure and local natural landscape features, including the underlying landform and topography of an area. Buildings should be human in scale and be informed by the surrounding historic environment.
- 10.11 London Plan Policy 7.6 sets out a series of overarching design principles for development in London, seeking to incorporate the highest quality materials and

design appropriate to its context. The policy seeks building and structures to be inter alia:

- of the highest architectural quality;
- of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm;
- comprise details and materials that complement;
- incorporate best practice in resource management and climate change mitigation; and
- meet the principles of inclusive design.

10.12 At the local level Camden Local Plan Policy D1 reflects these objectives and requires development to respect the local context and character and incorporate high quality design, materials and construction. Development should integrate well with the surrounding streets and open space, improve movement through the site and wider area and where possible offer direct, accessible and easily recognisable routes. Further to this development should minimise opportunities for crime and antisocial behaviour.

### **Assessment**

10.13 This section provides an assessment of design matters in the context of relevant policies. A comprehensive commentary regarding the design approach in respect of the Proposed Development is provided within the Design and Access Statement prepared by APA.

10.14 The design of the proposals has been carefully considered throughout the pre-application stage and is the result of an iterative process with input from Camden design officers, and Camden's Design Review Panel (both a full review and a subsequent Chair's Review).

10.15 The Site offers a significant development opportunity. The existing buildings, as described above and within the Design and Access Statement, are dated, unattractive and inefficient. The Site is underutilised despite its central location within Camden Town Centre. There is a significant opportunity for an office-led mixed use development that would greatly improve the efficiency and utilisation of

the Site which is encouraged by planning policy at all levels.

#### Commercial Building

- 10.16 The Development Proposals seek to demolish the upper floors of the building, retaining the first floor concrete deck to create two new buildings of highly sustainable design and architecture.
- 10.17 An important contributing factor to the extent of development has been the construction approach of the building. Redevelopment of the Site cannot proceed unless impact on the Sainsbury's supermarket operation is eliminated. This involves maintaining access to the store's delivering entrance and exit route and the customer car parking in the basement. As previously mentioned the new building will re-use the existing concrete raft foundation and existing basement car park columns. Re-using these elements will eliminate impact on the store's operations because no work will be required in the basement.
- 10.18 The ground to first floor concrete columns and floor slab will also be re-used. This maintains sufficient height for the first floor over the supermarket yard's exit. In addition, the concrete first floor will act as a crash deck for the erection of superstructure above. A normal delivery vehicle exit can be maintained below the bridge.
- 10.19 Reusing the existing structures sets a limit to the new weight that can be applied to them. The rest of the new building's structural design employs a lightweight superstructure system above first floor. It is a combination of steel and cross laminated timber. Using this system enables 3 and a half office storeys to sit on a structure that currently only supports one plus some mezzanine space. The structural loads have been maximised and this sets the height of the building.
- 10.20 Notwithstanding this, the scale and massing of the Proposed Development is considered to be appropriate in the context of the area, reflecting the similar building heights of the buildings along Kentish Town Road, but not as tall as the Hawley Wharf development further north. The saw tooth roof is considered to add visual interest and mark the Site's location in an appropriate way.

- 10.21 APA have considered how to generate the appropriate architectural expression for such a building without denying that its scale is also an opportunity to signal dynamic change in Camden's commercial building stock. The building's architectural expression is closely related to the geometry of the existing building. It re-uses the lower concrete structural grid. In order to minimise height, it avoids transfer structures at higher levels and maintains the same structural grid for steelwork established by the lower existing structure. This sets out a logical rhythm to the building's façade design.
- 10.22 APA's inspiration for the architectural language has been the robust elegance of commercial buildings of the early twentieth century. These buildings confronted the mechanisation and mass production of elements of architecture without overlooking proportion, detail and the value of three dimensional relief.
- 10.23 The commercial building has a clearly defined bottom, middle and top. The ground floor architecture responds to the street. The lower concrete structure will be insulated and encased in coloured, glazed ceramic. The material is often seen on public buildings in busy streets. The street level architecture will have a robust, characterful materiality and presence.
- 10.24 The horizontality of the commercial building is balanced through the considered division of the commercial frontage at Kentish Town Road in to 20 separate units defined by strong vertical design features which breaks up the elevational typology which in turn break up the long elevation. The active uses at ground floor coupled with the widened pedestrian underpass at the southern end of the building will further help to add variety to the elevation.
- 10.25 A considered and complementary pallet of materials for the façade treatment has been compiled: aluminium sill and column fascias at the upper levels and glazed ceramic tiling with honed precast concrete footing in pigmented green colour. The Heritage Assessment states that overall, the green tonality of the elevations is bold and adds visual interest to this section of Kentish Town Road and anchors the proposed development into the existing urban grain.

### Residential Building

- 10.26 The affordable housing will be accommodated within a separate building to the south of the Site. The building rises to ground plus three storeys in height, respecting the residential properties to the rear and of a height and mass considered appropriate to its settings.
- 10.27 The building comprises of natural beige brickwork with pale yellow window framing. The materiality is considered to be more modest than the commercial building mirroring the traditional materiality of the historic terraces close to Britannia Junction.
- 10.28 Overall the proposed scale and massing of the scheme relates well to the immediate and wider townscape. The horizontality of the Proposed Development is balanced through the division of the building into vertical bays. The materiality is considered to enhance this part of the Regents Canal Conservation Area and setting of the Grade II listed St Michael's Church. The Proposed Development is sited and designed to respect its townscape and visual context.

### **Public Realm and Landscaping**

- 10.29 Policy 7.5 of the London Plan seeks to ensure amongst other objectives, that London's public spaces should be secure, accessible, easy to understand and maintain and incorporate the highest quality landscaping, planting, furniture and surfaces.
- 10.30 Camden Local Plan Policy D1 (k) advises that development should incorporate high quality landscape design (including public art, where appropriate) and maximise opportunities for greening.
- 10.31 Paragraph 7.22 within the Camden Local Plan advises that Camden will expect development schemes to provide a high standard of landscape design and encourages the development of green and brown roofs and walls. The design of new hard and soft landscaping should be contextual and consider access requirements.

- 10.32 Camden Local Plan Policy T1 promotes the prioritisation of walking in the borough and supports improvements to the pedestrian environment by supporting high quality public realm improvement works and the provision of high quality safe road crossings where needed and seating.

### **Assessment**

- 10.33 A Landscaping Statement for the scheme has been prepared by Turkington Martin and is submitted in support of this Application. The document covers the public realm and landscaping proposals included within the scheme in further detail.
- 10.34 The public realm strategy set out within the Development Proposals take a design influence from the Yorkstone finishes at Camden Underground Station plaza, this accords with the advice set out within Camden's Street Design Guide. The Yorkstone flags present a unified frontage along Kentish Town Road and provide a high quality pedestrian threshold to the entrance lobby.
- 10.35 In reference to the historic character of Camden and mirroring their uses along Camden High Street, and Camden Lock, granite setts are proposed at the vehicular areas.
- 10.36 The pedestrian footway adjacent to Buck Street on the western side of Kentish Town Road is to be widened which will complement the TfL proposals for a new pedestrian crossing in this area. The kerb is to be realigned as part of traffic calming measures outside of the new development and to help define the new accessible parallel parking bays.
- 10.37 The reorientation of the entrance lobby allows a considerable portion of land within the Site is given over to public realm space adjacent to the crossing, helping to significantly improve access across the Site and the pedestrian experience within the area. It also allows for the provision of a widened route through the Site at ground floor level, linking Camden High Street and the new Camden Town underground station entrance on Buck Street more clearly with Camden Road, via the route adjacent to Sainsbury's and St Michael's Church. The provision of a widened route through the Site is intended to improve east-west and radial



connections through Camden which are currently fairly north-south focused.

- 10.38 Complementing the proposals is sculptural seating, and raised planters along the Kentish Town Road frontage. The street furniture is designed and set out to contribute to the ambience of the new active street, providing an amenity and degree of protection to the footway.
- 10.39 At third floor level a high quality landscaped roof terrace is provided for use by the office occupiers. A further planted terrace is provided at roof level. Further details on the proposed plant species can be found within the Landscape Statement produced by Turkington Martin and submitted in support of the Application.
- 10.40 Throughout the process the Applicant engaged with the adjacent landowners, Sainsbury's and St Michael's Church, in respect of the Proposed Development, with an aspiration to seek to deliver further enhancements to the public realm around the Site. At this stage the Applicant's construction programme does not align with that of Sainsbury's or St Michael's Church. However, the Development Proposals will facilitate the delivery of further public realm enhancements should there be an opportunity in the future. As such the intention is that the scheme will act as a catalyst for change within the immediate vicinity.
- 10.41 The Application proposals provide a much improved pedestrian environment and sufficient public realm which accords with the vision and objections of the growth area as well as adopted and emerging planning policy.

## **Heritage**

- 10.42 The Government has attached great importance to conserving and enhancing the historic environment in the NPPF. The NPPF advises that decisions on applications with implications on designated heritage assets should be made on the basis of the significance of the asset, and the harm (substantial or less than substantial) that the proposal would cause to the significance of the heritage asset.
- 10.43 Under paragraph 189 of the NPPF in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. In undertaking this

requirement the level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

- 10.44 Further to this, paragraph 190 states that **“local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this in to account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal”**.
- 10.45 Paragraph 196 of the NPPF states that where a proposed development will lead to less than substantial harm to a designated heritage asset, this this harm shall be weighed against the public benefits of the proposals.
- 10.46 Paragraph 197 of the NPPF states that when determining applications a balanced judgment should be made weighing the scale of any harm or loss against the significance of a non-designated heritage asset. Further to this paragraph 200 of states that local planning authorities should look for opportunities within the setting of heritage assets to enhance or better reveal their significance. In pursuance of this paragraph 202 advises that in determining proposals for enabling development local planning authorities should consider its potential to secure the future conservation of a heritage asset.
- 10.47 Policy 7.8 of the London Plan states that **“development should incorporate measures that identify, record, interpret, protect and, where appropriate, present the site’s archaeology...Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail”**.
- 10.48 This objective is carried forward within emerging London Plan Policy HC1.
- 10.49 At the local level, Camden Local Plan Policy D2 states that **“the Council will preserve and, where appropriate, enhance Camden’s rich and diverse heritage assets and their settings, including conservation areas”**. Further to this, the text

at paragraph 7.46, supporting Policy D2, states that in order to preserve or enhance important elements of local character, the factors that create that character must be considered. In determining applications for development in conservation areas the London Borough of Camden will seek to manage change in a way that retains the distinctive character of the area and expect new development to contribute positively to this process. To support this process the London Borough of Camden has prepared conservation area appraisals for each conservation area.

- 10.50 Camden Local Plan Policy D2 states that designated heritage assets include conservation areas and listed buildings and the Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss.
- 10.51 Policy D2 of the Local Plan goes on to state that conservation areas are designated heritage assets and that in order to maintain the character of Camden's conservation areas, the Council will take account of conservation area statements, appraisals, and management strategies when assessing applications within conservation areas. The Council will require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area. Similarly, the Council will resist development that would cause harm to significance of a listed building through an effect on its setting.
- 10.52 The Regent's Canal Conservation Area Appraisal advises that **"the special character of the area is largely derived from the almost hidden nature of the canal. The surrounding townscape largely turns its back on the canal creating a tranquil space distinct from the business of the surrounding city"**.

### Assessment

- 10.53 A Heritage Assessment has been prepared by Ettwein Bridges and submitted as part of the Application. Please refer to this for further information regarding heritage matters.
- 10.54 The Site falls within the southern boundary of the Regent's Canal Conservation Area within Sub Area 2 and forms part of the wider setting for Kentish Town Bridge and

Kentish Town Locks albeit that the Site is not specifically mentioned within the Conservation Area Appraisal.

- 10.55 The Site also falls within proximity to the northern extent of the Camden Town Conservation Area Sub Area 1 and within views from within the Conservation Area. Again the Site is not specifically mentioned within the Conservation Area Appraisal.
- 10.56 To the rear of the Site, on Camden Road, sits the Grade II listed St Michael's Church.
- 10.57 The Heritage Assessment advises that existing building on Site is of no particular heritage or architectural value and does not represent a building of national importance. In assessing the Development Proposals, the Heritage Assessment concludes that proposed new building is of appropriate scale, massing and materiality, and as such will significantly enhance the character of this section of the Regent's Canal Conservation Area.
- 10.58 The setting of the church will be significantly improved by the Proposed Development which will create visual links with the listed church through its elevational typology and help to reverse the nature of the central courtyard as purely a service yard. The setting and character of Camden Town Conservation Area will equally be improved through the provision of the appropriate new residential element which relates well to the established scale, massing, height and materiality of the northern section of the Conservation Area.
- 10.59 In conclusion there is no harm to the significance of any designated or non-designated heritage asset and as such the need to balance any harm against the public benefits of the scheme under paragraphs 196 and 197 of the NPPF does not apply. Notwithstanding this, substantial public benefits do flow from the proposals as detailed throughout this Statement. The Proposed Development will enhance local townscape character without harming the settings of nearby heritage assets. The combined effects on local townscape and visual amenity will be entirely beneficial.

## **Views**

- 10.60 London Plan Policy 7.11 designates a number of strategic views which are

described in more detail in the London View Management Framework (LVMF) SPG. The LVMF SPG provides guidance on the policies in the London Plan for the protection of strategically important views in London, and explains how 26 views designated by the Mayor and listed in the London Plan are to be managed.

- 10.61 Policy D1 of Camden's Local Plan states that the Council will seek to secure high quality design in development and that they will require that development preserve strategic and local views.

### **Assessment**

- 10.62 The Site does not fall within any views within the LVMF. However, a Townscape, and Visual Impact Assessment (TVIA) has been prepared by Ettwein Bridges and submitted as part of this Application.
- 10.63 A full analysis of the Proposed Development within local views has been undertaken as part of the pre-application process and the key views have been tested and reported within the accompanying TVIA.
- 10.64 The 15 views assessed as part of the TVIA demonstrate that, where visible, the Proposed Development will enhance the views with an appropriately scaled urban development that positively addresses the views within which it is visible.
- 10.65 As the TVIA concludes, that the Proposed Development would have no effect in respect of the 15 views assessed and in some cases would enhance existing views. Importantly the proposals would maintain the perspective of channelled street views looking east and west along Kentish Town Road and reinforce the strong built edge on the east side of the road. Its scale and form would respect the development on the opposite side of Kentish Town Road, and the development to the rear of the site, including Grand Union Walk, Sainsbury's, and most importantly the Grade II listed St Michael's Church. Views of the church would be maintained and enhanced as a result of the Proposed Development.
- 10.66 The Proposed Development would form a barely noticeable element in views from Primrose Hill Conservation Area and Regent's Park Conservation Area and would not have a significant effect on the setting of Regent's Canal or Camden Town

Conservation Areas. The visual impact from Buck Street: Junction with Stuckley Place would not be new, but it would be increased in height. However the Proposed Development would add urban interest within an area of run-down development.

- 10.67 The views demonstrate that the scale of the Proposed Development will relate comfortably to the existing context and would not have a significant effect on the building's setting and would not reduce the prominence of local landmarks in local views. The TVIA concludes that the proposed building would not appear as an over dominant element within the existing streetscape but rather as a different building of equivalent scale complementary to its environment. Accordingly the proposals are considered to comply with planning policy.

## 12 Energy and Sustainability

- 12.1 A Sustainability Statement (including BREEM Pre-Assessment) and an Energy Statement have been produced by WSP and submitted as part of the Application. These documents set out the environmental performance and the sustainability credentials of the Proposed Development. These reports should be read alongside this section of the Statement.
- 12.2 Within the NPPF, the Government requires that planning supports the transition to a low carbon future. In achieving this planning should shape development so that it contributes to significant reductions in greenhouse gas emissions and improve its resilience to climate change. In pursuance of this, the reuse of existing resources, including the conversion of existing buildings is supported.
- 12.3 Paragraph 150 of the NPPF states that new development should avoid increased vulnerability to the range of impacts arising from climate change, help reduce greenhouse gas emissions. The NPPF states that in achieving this, the location, orientation and design of development should be considered.
- 12.4 Paragraph 154 of the NPPF states that when determining applications for renewable and low carbon development, local planning authorities should **“approve the application if its impacts are (or can be made) acceptable”**.
- 12.5 The London Plan Policy 5.2 encourages development proposals to **“make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy:**
- **Be lean: use less energy;**
  - **Be clean: supply energy efficiently;**
  - **Be green: use renewable energy”**.
- 12.6 London Plan Policy 5.2 also requires, for both residential and non-residential development, a reduction in carbon emissions of 40% beyond 2010 Part L. The GLA has subsequently published guidance confirming that this is broadly equivalent to a 35% reduction beyond 2013 Part L.

- 12.7 Policy 5.3 of the London Plan states that the highest standards of sustainable design and construction should be achieved in London to improve the environmental performance of new developments and to adapt to the effects of climate change over their lifetime. Development proposals should demonstrate that sustainable design standards are integral to the proposal, including its construction and operation, and ensure that they are considered at the beginning of the design process.
- 12.8 Policy 5.6 of the London Plan requires all developments to demonstrate that their heating, cooling and power systems have been selected to minimise carbon dioxide emissions.
- 12.9 London Plan Policy 5.7 outlines that the Mayor seeks to increase the proportion of energy generated from renewable sources, and all major development proposals should provide a reduction in expected carbon dioxide emissions through the use of on-site renewable energy generation, where feasible.
- 12.10 The Mayor's Sustainable Design and Construction SPG (2014) advises that Developments should contribute to ensuring resilient energy infrastructure and a reliable energy supply, including from local low and zero carbon sources. It also sets out the following design measures for improving the sustainability of developments:
- optimise natural daylight;
  - optimise solar gain;
  - optimise insulation;
  - optimise air tightness;
  - optimise thermal mass;
  - Incorporate green infrastructure;
  - Maximise potential for natural ventilation.
- 12.11 At the local level, Camden Local Plan Policy CC1 requires all development to minimise the effects of climate change and encourages all development to meet the highest feasible and viable environmental standards. Moreover, all development is required to reduce carbon dioxide emissions in line with the targets set out within the London Plan.



- 12.12 In support of these objectives Camden requires the location of development and mix of land uses to minimise the need for car travel, support energy efficiency improvements to existing buildings and the optimisation of energy efficiency.
- 12.13 Camden Local Plan Policy CC2 advises that development should adopt appropriate climate change adaption measures. CC2 requires any development involving 5 or more residential units or an increase of floor space of 500sqm to, where appropriate; protect existing and promote new green infrastructure; maintain and where possible reduce surface water run-off and incorporate bio-diverse roofs and green walls. Measures should also be included to reduce the impact of urban and dwelling overheating, including application of the cooling hierarchy.
- 12.14 In assessing the sustainable design and construction of development the Council will promote and consider the following;
- how adaptation measures and sustainable development principles have been incorporated into the design and proposed implementation;
  - encourage new build residential development to use the Home Quality Mark and Passivhaus design standards;
  - encouraging conversions and extensions of 500sqm of residential floorspace or above or five or more dwellings to achieve “excellent” in BREEAM domestic refurbishment; and
  - expecting non-domestic developments of 500sqm of floorspace or above to achieve “excellent” in BREEAM assessments and encouraging zero carbon in new development from 2019.

## **Assessment**

- 12.15 The Applicant is committed to delivering a scheme with good environmental performance. APA and the project team have worked to ensure that sustainability measures have been considered in detail. The Proposed Development will be highly sustainable and energy efficient.
- 12.16 An Energy Statement and Sustainability Statement (including BREEAM pre-assessment report) have been prepared by WSP, and have been submitted in

support of this Application.

- 12.17 The report contains the predicted energy and carbon emission of the Proposed Development and sets out the proposed low and zero carbon technologies to be incorporated into the scheme. It assesses how the proposals seek to accord with the policies and principles of sustainable development. A summary of this is provided below against the three sections of the Mayor's energy hierarchy.
- 12.18 The Proposed Development has been modelled in the Energy Strategy using Government approved software to calculate the baseline carbon dioxide emissions. The energy modelling is calculated using the Building Regulations methodologies to achieve an annual carbon emission saving of tonnes over the baseline scheme.
- 12.19 The focus of the Energy Strategy is on CO<sub>2</sub> reduction by using a highly efficient building envelope with high efficiency mechanical and electrical services, along with waste heat recovery to meet domestic hot water pre-heat demand and water source heat pumps, in conjunction with photovoltaic cell renewable technology. The result is a Proposed Development with predicted performance of:
- The non-residential element meets the 35% reduction target set in the London Plan.
  - The residential element meets on-site reduction of 35.7%.
- 12.20 The shortfall to the zero-carbon target will need to be made up via carbon offset payments.
- 12.21 The Energy Statement explains that, because the most carbon-efficient approach to energy supply is the use of grid-supplied energy rather than combined heat and power, a CHP engine has not been proposed for the Site as the true carbon savings of the technologies have diminished with the decarbonisation of the grid. Using up to date carbon emission factors for grid electricity causes CHP engines to produce more carbon than a standard boiler system.
- 12.22 To maximise the energy efficiency of the Proposed Development and thus reduce energy demands, the following design principles have been incorporated:

- A curtain walling system comprising high performance insulating glass units.
- High performance MEP building services.
- The reception area will be served by an all air system which will provide heating, cooling and ventilation to the space. This system will also offer heat recovery using a thermal wheel.
- The cycle storage along with showers, toilets and changing rooms are located on the mezzanine level and will be provided with a dedicated extract system. These rooms will have minimal space heating requirements.
- The ground floor units will be completed to shell and core standard only, providing base services for future extension by tenants and temporary life safety systems protecting the building while the units are unoccupied.
- The building services for all residential units will be fully fitted as part of the development and will consist of:
  - Centralised ventilation with heat recovery.
  - 100% low energy lighting.
  - Residential units will be served by individual combination boilers for provision of space heating and DHW.
  - Heating is to be provided via radiators.
  - 6kWp (Approximately 50m<sup>2</sup>) of PV array connected to the landlord's supply.

12.23 In regard to district heating provision, a possible future district heating network is shown in proximity to the Site at Euston Road. However, the closest connection point would be at Goldington Street to the South East of the Site which is a distance of approximately 1km. The Energy Strategy submitted in support of the Application confirms that this distance is too great to make connection a viable solution. Moreover, the limited space for an energy centre means it is only possible to provide heat for the Proposed Development alone and not to connect to and serve other buildings.

12.24 The Sustainability Statement, along with the BREEAM Pre-Assessment Report, outlines the Sustainability Strategy for the Proposed Development in response to the requirements of LBC and the London Plan.

12.25 In respect of sustainability, the design team has developed a holistic approach across the whole Site to deliver sustainability targets. The Proposed Development

will ensure the highest levels of sustainability are attained within the design and construction of Grand Union House.

12.26 The office and retail element meets BREEAM 'Excellent' standards. The key proposed sustainability measures are as follows:

- Responsible Construction Practices.
- Building User Guide.
- Reduced water consumption.
- Reduced energy use and carbon emissions.
- Energy monitoring.
- Water monitoring.
- Responsible sourcing of construction products.
- Operational waste management.

12.27 A full BREEAM Pre-Assessment has been undertaken and accompanies this Application, appended to the Energy and Sustainability Statement.

### **Flooding and Drainage**

12.28 At a regional level, Policy 5.11 contained within the London Plan states that the proper consideration of flood risk is vital to ensuring that London is and continues to be a sustainable city.

12.29 At the local level Camden Local Plan Policy CC2 advises that all development should adopt appropriate climate change adaption measures, including not increasing, and wherever possible reducing, surface water runoff through increasing permeable surfaces and use of Sustainable Drainage Systems.

### **Assessment**

12.30 At the basement level of Grand Union House Sainsbury's have an operational customer car park. This must remain operational during both construction and occupation of Grand Union House. As such, the Proposed Development will utilise the existing concrete structure from the foundations to level one. The construction phase does not include any below ground works in respect of 20 Kentish Town Road, albeit lift pits are proposed below ground in respect of the existing 16 Kentish

Town Road.

- 12.31 In order to make the most efficient use of the land available and provide the maximum floor space on Site, WSP undertook a structural analysis of the existing structure. The analysis showed that adding green roof/blue roof attenuation would not be possible as it would require strengthening works to be undertaken to the internal columns between basement and ground level.
- 12.32 These works would be disruptive and would render the scheme undeliverable due to the impact on Sainsbury's basement operation. Therefore there is no scope within the existing structure to incorporate any surface water attenuation, and due to lease restrictions regarding access under the ground as set out above, providing attenuation within the new build area is also restricted. Therefore, it is proposed that the development will mimic existing discharge rates with no formal attenuation proposed.
- 12.33 Surface water will discharge at the same rate as existing as there is currently no scope to incorporate attenuation within the plot.

## 13 Transport

- 13.1 Within the NPPF, the Government places great weight on the importance of delivering sustainable transport solutions to support new development so that the potential impacts of development on transport networks can be addressed, opportunities to promote walking, cycling and public transport use are identified and pursued, and the environmental impacts of traffic and transport can be minimised. In pursuance of these objectives paragraph 102 of the NPPF states that transport issues should be considered from the earliest stages of plan-making and development proposals.
- 13.2 One of the key objectives of the NPPF is to actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable. Furthermore paragraph 104 states that planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities.
- 13.3 One of the strategic objectives of the London Plan is to improve accessibility, making London an easier city to move around and making public transport and the pedestrian environment accessible to everyone. The Mayor's Transport Strategy sets out policies and proposals to achieve the goals set out in the Plan.
- 13.4 Policy 6.1 of the London Plan seeks to ensure the integration of transport and development by a number of strategic measures including:
- Encouraging patterns and forms of development that reduce the need to travel, especially by car;
  - Improving public transport capacity and accessibility, where it is needed, for areas of greatest demand and areas designated for development and regeneration; and
  - Supporting high trip generating development only at locations with high levels of public transport accessibility and capacity, sufficient to meet the transport requirements of the development.
- 13.5 Paragraph 111 in the NPPF and London Plan Policy 6.3 require applications for

development proposals which could cause significant increases in movement to be accompanied by an assessment of the impact of the scheme on existing transport networks, as well as an assessment of how the scheme optimises sustainable methods of travel.

- 13.6 Policies 6.9 and 6.10 in the London Plan sets out the Mayor's steps for bringing forward a significant increase in cycling and walking in London. With respect to cycling, development should provide secure, integrated and accessible cycling facilities in line with the minimum standards set out in London Plan, as well as providing on-site changing facilities and showers for cyclists.
- 13.7 Policy 6.10 indicates that **“the Mayor will work with all relevant partners to bring about a significant increase in walking in London, by emphasising the quality of the pedestrian environment, including the use of shared space principle promoting simplified streetscape, de-cluttering and access for all”**.
- 13.8 The Mayor's Transport Strategy (2010) sets out policies and proposals to achieve the goals set out in the London Plan providing a vision of London as an exemplary sustainable world city.
- 13.9 Table 4 sets out the minimum cycle parking standards relevant to the application. In order to encourage walking, development proposals should ensure high quality pedestrian environments.

Land Use	Long-stay	Short-stay
<b>Food retail (Class A1)</b>	1 space per 175 sq. m	1 space per 40 sq. m for the first 750 sq. m, 1 space per 300 sq. m thereafter
<b>Non-food retail (Class A1)</b>	1 space per 250 sq. m for the first 1,000 sq. m, 1 space per 1,000 sq. m thereafter	1 space per 125 sq. m for the first 1,000 sq. m, 1 space per 1,000 sq. m thereafter
<b>Cafés and restaurants</b>	1 space per 175 sq. m	1 space per 40 sq. m

<b>(Class A3)</b>		
<b>Business offices (Class B1)</b>	1 space per 90 sq. m	First 5,000 sq. m: 1 space per 500 sq. m  Thereafter: 1 space per 5,000 sq. m
<b>Community uses (Class D2)</b>	1 space per 8 staff	1 space 100 sq.m

Table 4: Relevant London Plan Cycle Parking Minimum Standards (Table 6.3, London Plan)

- 13.10 At the local level Camden Local Plan Policy T1 prioritises walking, cycling and public transport in the borough. In pursuance of this Camden will seek to ensure developments improve the pedestrian environments by supporting improvements to the pedestrian environment. The delivery of improved walkways, wide pavements and safe and permeable developments is supported.
- 13.11 Policy T1 (g) states that Camden will seek to ensure that development provides for accessible, secure cycle parking facilities exceeding minimum standards outlined within the London Plan (Table 6.3) and design requirements outlined within Camden's Transport CPG.
- 13.12 Policy T1 promotes the prioritisation of walking in the borough and supports improvements to the pedestrian environment by supporting high quality public realm improvement works and the provision of high quality safe road crossings where needed and seating.
- 13.13 Camden Local Plan Policy T2 states that the Council will limit the availability of parking and require new development in the borough to be car free.
- 13.14 The text at paragraph 10.20 supporting Policy T2 states that **“in redevelopment schemes, the Council will consider retaining or re-providing existing parking provision where it can be demonstrated that the existing occupiers are to return to the address when the development is completed”**.



## Assessment

- 13.15 A Transport Assessment (including a including a Travel Plan, Delivery and Servicing Management Plan, Waste Storage and Collection), prepared by WSP has been submitted in support of this Application. The Transport Assessment assesses the likely transport implications arising from the Proposed Development and sets out the proposed parking, access and servicing arrangements.
- 13.16 The Site benefits from a PTAL rating of 6b (the best), which demonstrates its excellent access to public transport. The Site is therefore well served by public transport services.
- 13.17 The nearest station is Camden Town Underground Station which is located approximately 150 metres to the south of the Site and is served by both branches of the Northern Line. Camden Road Rail Station is located approximately 400m to the north-west of the Site and Euston Station is located approximately 1.6km to the South.
- 13.18 TfL is currently preparing a scheme of proposals for upgrades to Camden Town underground station. The first consultation on the proposals was commenced in 2015 and was followed by a second round in 2017. Consultation on proposals for a new entrance on Buck Street opposite the Site was held in 2017, the proposals received positive feedback. A second consultation on the proposals for the new Buck Street entrance is expected for late 2018. An application under the Transport and Works Act Order for the station improvements is anticipated for late 2019 for implementation in 2021.
- 13.19 In terms of car parking provision, the Development Proposals accord with the objectives of Camden Local Plan Policy T2 and London Plan Policy 6.2. The scheme will be car-free development.
- 13.20 The 12 existing car parking spaces which must be retained as part of a lease with 12 residential units at Grand Union Walk adjacent will be re-provided at the ground floor. This will not be for use by occupants of the Proposed Development.
- 13.21 The existing building benefits from good access to on-street parking provision within

Camden Controlled Parking Zones. It is proposed that accessible parking only is provided. This will comprise one accessible parking bay provided at Kentish Town Road, available to Blue Badge holders only. As a result of this element of the Development Proposals one 'paid for' parking bay will be relocated further south on Kentish Town Road. This strategy has been discussed with Camden highway officers. In accordance with the London Plan the Proposed Development is designed to be car-free, therefore the only motor-vehicle access within the Site will be for servicing, delivery services and accessible parking.

- 13.22 The Development Proposals include 77 long-stay cycle parking spaces for the commercial uses, within a secure mezzanine floor to the rear and above the ground floor units. A platform lift and single access stair with associated gulley will be provided for access to the long stay commercial cycle parking. The cycle parking spaces will be provided as Sheffield Stands.
- 13.23 10 long stay cycle parking spaces will be provided for the residential element of the Development Proposals, within a bike store on the ground floor of the residential building and therefore will be sheltered and secure.
- 13.24 The long stay cycle parking provision exceeds the minimum cycle parking standards set out within the London Plan Table 6.3 and Policy T1 within the Camden Local Plan.
- 13.25 The proposed short-stay cycle parking will provide 42 spaces and will be located on the street at Kentish Town Road in the form of Sheffield stands. The short-stay cycle parking provision will accord with the standards required by London Plan Table 6.3 and Policy T1 within the Camden Local Plan.
- 13.26 The Development Proposals include several alterations to the highway infrastructure within the Site, these are listed below:
- The pedestrian footway through the Site will be widened.
  - Reposition existing Kentish Town Road parking bays to the south of the Site.
  - Visitor cycle parking will be provided in the form of Sheffield stands on the northern section of the footway where the pavement is in excess of 6m wide, providing sufficient space for pedestrians to pass.

13.27 The short-stay parking and alterations to the highway infrastructure will be secured by planning condition or Section 106 obligation and delivered pursuant to a Section 278 Agreement.

13.28 The enhancements will improve access within the area and the pedestrian experience at Kentish Town Road. The proposals accord with the objectives set out in London Plan Policy 6.09 and 6.10 and Camden Local Plan Policy T1 by placing an impetus on walking and cycling and promoting the use of sustainable modes of transport.

### **Trip Generation**

13.29 In order to determine the net effect of the development proposals the number of trips forecast to be generated as a result of the Proposed Development has been compared with the operation of the existing Site. These have been split by use class below.

- Office use: In total 179 two-way trips are forecast during the AM peak and 173 two-way trips are forecast during the PM peak. The majority of trips by employees during peak hours are undertaken on public transport services.
- Ground floor uses: It is considered that the proposed scale and nature of the units would generally serve the local resident and daytime population of the surrounding area, as well as new office workers at the Site. It is considered that mainly walk-in trips from the adjacent network would be generated.
- Residential use: In total 4 two-way trips are forecast during the AM peak and 2 two-way trips are forecast during the PM peak. All residential trips during peak hours are undertaken on public transport services or by walking.

13.30 The assessment of trip generation found that overall the Proposed Development is forecast to generate a net increase of 4 and 3 two-way pedestrian trips to and from the Proposed Development during the weekday AM and PM hours, respectively.

13.31 A further 65 and 66 trips per peak hour are forecast towards the public transport service access at Camden Town Underground Station, Camden Road Station and

the local bus stops within the vicinity.

### **Delivery, Servicing and Waste Management**

- 13.32 Refuse collection is currently undertaken from Kentish Town Road. A servicing survey undertaken by WSP found the 42 existing servicing trips were recorded at the Site between the hours of 07:00-19:00. The proposed servicing strategy forecasts a total of 24 two-way servicing trips. The Proposed Development therefore results in a reduction of 18 two-way servicing trips compared with the existing Site.
- 13.33 Refuse collection and all servicing will continue to be undertaken from Kentish Town Road and a management system will be put in to place to determine slots for deliveries for each of the occupiers and encourage the office occupiers and occupiers of the ground floor units to consolidate trips. The only deliveries which will not be controlled will be the refuse collection which is proposed to be twice a week, and any residential servicing trips which are likely to be infrequent.
- 13.34 Residents will be responsible for transporting their waste from their individual apartments directly to the residential waste store on the ground floor. The residential waste will be collected on a weekly basis by Camden waste collection operatives who will wheel out the bins to the refuse vehicle on Kentish Town Road.
- 13.35 Commercial occupiers will be required to provide waste storage areas within their premises. On collection days the collection operatives will collect the waste directly from the smaller ground floor retail and/or restaurant units to the refuse vehicle stopped on Kentish Town Road. The office and larger retail, restaurant and/or leisure units will utilise the communal refuse yard which will be collected twice weekly.
- 13.36 The Transport Assessment concludes that the impact of the Proposed Development would be negligible on the public transport network, with a reduction in car trips, thus the Application is acceptable from a highways and transport perspective.
- 13.37 The Proposed Development is considered to meet the objectives of current national, regional and local policy for a number of reasons, including:

- The Proposed Development supports NPPF's objectives, to promote more sustainable transport choices and to promote accessibility to jobs and services; thereby reducing the need to travel;
- The Site has excellent accessibility to public transport, with many local bus, main line rail and Underground services available within a short walking distance from the Site. This fulfils a number of policy objectives;
- Secure cycle parking and associated facilities for cyclists will be provided thus achieving a number of cycling standard at regional and local level;
- The proposal only includes the provision of accessible off-street car parking; and
- The provision of a Travel Plan that manages and monitors the trips associated with the Proposed Development will ensure that building users make trips in the most sustainable way possible.

13.38 The Transport and Servicing arrangements are covered in further detail within the Transport Assessment and associated appendices, prepared by WSP, which accompany this Application.

## 14 Technical Considerations

- 14.1 This section addresses other technical amenity considerations including air quality, noise and daylight and sunlight.

### Air Quality

- 14.2 NPPF paragraph 180 advises that planning decisions should ensure that development is located appropriately. Development proposals should consider the likely effects of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from development. In pursuance of this development proposals should mitigate and reduce to minimum potential adverse impacts in amenity.
- 14.3 The London Plan Policy 7.14 seeks to reduce pollutant emissions and minimise public exposure to pollution. The Mayor will work with strategic partners to ensure that the policies of the London Plan support the implementation of Air Quality and Transport Strategies.
- 14.4 The GLA Housing SPG Standard 33 requires development to **“minimise increased exposure to existing poor air quality and make provision to address local problems of air quality : be at least ‘air quality neutral’ and not lead to further deterioration of existing poor air quality (such as areas designated as Air Quality Management Areas (AQMAs))”**.
- 14.5 The GLA Sustainable Design and Construction SPG (paragraph 4.3.2) states that **“the two pollutants of specific concern in London are particulate matter (PM10 and PM25) and nitrogen dioxide (NO2)”**. Transport is the prime contributor of these emissions in Greater London.
- 14.6 At the local level Camden Local Plan Policy CC4 states that London Borough of Camden will ensure that the impact of development on air quality is mitigated and that exposure to poor air quality is reduced in the borough. When assessing development proposals consideration will be taken to the actions identified in the Council’s Clean Air Action Plan.

- 14.7 Camden Amenity Planning Guidance states that all of Camden is a designated Air Quality Management Area due to the high concentrations of nitrogen dioxide (NO<sub>2</sub>) and particulate matter (PM<sub>10</sub>). As such all developments are to limit their impact on local air quality. An Air Quality Assessment is required to support any scheme which proposes uses susceptible to poor air quality, such as housing.
- 14.8 The demolition and construction phases of development on air quality must be taken into account as part of planning applications. Mitigation and offsetting measures to deal with any negative air quality impacts associated with development must be implemented.
- 14.9 The London Borough of Camden has, since 2000, been designated an Air Quality Management Area. The Camden Air Quality Action Plan (2016) sets out a variety of actions to help reduce key air pollutants in the Borough arising from road traffic, gas boilers and other sources. Action 14 seeks to **“minimise emissions from the construction and operation of new developments by requiring developers to adhere to current and any superseding best practice guidance and supplementary planning guidance”**.

### Assessment

- 14.10 An assessment (using the IAQM methodology) of the impacts of the existing and future traffic levels on the air quality of the Proposed Development has been undertaken by WSP. The Air Quality Assessment is submitted in support of this Application.
- 14.11 The Air Quality Assessment prepared by WSP has assessed the existing air quality conditions at, and in the vicinity of, the Site; as well as the potential changes in air quality arising from the construction and operation of the Proposed Development. The document considers appropriate mitigation measures to ensure that any adverse effects on air quality are minimised.
- 14.12 The Air Quality Assessment finds that the dust emitting activities that would result during the demolition and construction phases that there is a medium to low risk of both dust soiling and human health effects due to construction activities. However, through good site practice and the implementation of suitable mitigation measures,

the effect of dust and particulate matter releases would be significantly reduced. The residual effects of the construction phase on air quality are likely to be not significant.

- 14.13 During the operation phase, no significant effects are anticipated from traffic or boiler emissions from the Proposed Development. As a result, no mitigation measures are proposed. It is considered that no mitigation is required as the Proposed Development complies with the air quality neutral policy.
- 14.14 As assessment of the traffic flows found that the predicted changes brought about as a result of the Proposed Development, would be below the threshold for carrying out a detailed assessment, and so the impacts on air quality have been assumed to be not significant.
- 14.15 The Air Quality Assessment concludes that the Proposed Development presents medium to low risk for both dust soiling impacts and particulate matter concentrations due to construction activities and the residual effect of emissions to air from construction vehicles and plant on local air quality is not significant.
- 14.16 The exposure of the new occupants of the Proposed Development to potentially elevated pollutant concentrations was found to be above objectives and therefore specific mitigation measures are required to protect new users within the Proposed Development.
- 14.17 In summary, the Proposed Development will be air quality neutral with regards to both building and transport emissions. Therefore the Proposed Development complies with national, regional and local policy for air quality.

## **Noise**

- 14.18 The NPPF states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability.
- 14.19 Policy 7.15 of the London Plan confirms that development proposals should seek to



reduce noise by: minimising the existing and potential adverse impacts of noise on, from, within, or in the vicinity of, development proposals; separating new noise sensitive development from major noise sources wherever practicable through the use of distance, screening, or internal layout in preference to sole reliance on sound insulation and; promoting new technologies and improved practices to reduce noise at source.

- 14.20 City Soundings: The Mayor's London Ambient Noise Strategy (2004) sets out the Mayor's guidance on how to minimise the adverse effects of noise on people living, working and visiting London. The Strategy aims to work towards a more compact city development while minimising noise. It states that careful consideration should be taken of the adverse effect that noise can have on, from, within or in proximity to a development. This document is due to be superseded by the Draft London Environment Strategy late 2018.
- 14.21 Camden Local Plan Policy A4 advises that LBC will seek to manage noise and vibration within the Borough. As such development will only be permitted where it can operate without causing harm to amenity. In pursuance of this development should have regard to Camden's noise and vibration thresholds set out at appendix 3 of the Camden Local Plan.

### **Assessment**

- 14.22 An Acoustic Report has been prepared by WSP and accompanies the Application. The Acoustic Report presents the results of the survey that were carried out and assesses the implications against appropriate design standards and current planning guidance.
- 14.23 The measurement locations used in the survey are outlined in the Acoustic Report. The locations were chosen to be representative of the typical ambient noise level at each façade of the Proposed Development and to establish existing background noise levels at the closest noise sensitive receivers. An automated survey of the existing background noise levels was undertaken at two locations around the perimeter of the site:
- Monitoring Position 1 (MP1): Cantilevered from the roof of the existing

building overlooking Kentish Town Road.

- Monitoring Position 2 (MP2): Cantilevered from the roof of the existing building overlooking the rear of Sainsbury's and St Michael's Church (to the south east).

- 14.24 For each measurement, the noise climate and the measured noise levels were recorded and noted.
- 14.25 The locations were chosen to minimise the influence from building services plant serving the existing development and to best capture the most significant sources of noise likely to affect the Proposed Development. The background noise climate at the Site is determined by road traffic in the surrounding streets with contributions from existing plant on nearby buildings.
- 14.26 The primary existing noise sources that will affect the internal noise levels within the residential buildings are road traffic noises and building services noise from nearby buildings. The internal noise level limits will be achieved via a sound insulating façade and a suitably sound attenuating mechanical ventilation strategy.
- 14.27 The Acoustic Report concludes, based on the assessments which have been carried out, that the internal noise level limits and plant noise limits set out by the GLA and Camden can be met.
- 14.28 The Proposed Development will be acceptable in terms of noise impact on the neighbouring properties and future occupiers. As such the scheme is in accordance with London Plan Policy 7.15 and Camden Local Plan Policy A4.

### **Daylight / Sunlight**

- 14.29 Access to daylight and sunlight is important for general amenity, health and well-being, as well as bringing warmth in to homes thereby reducing the energy consumption. As such it is crucial the development proposals include good levels of daylight and sunlight accessibility.
- 14.30 London Housing SPG Standard 32 advises that all homes should provide for direct sunlight to enter at least one habitable room for part of the day. Living areas and

kitchen dining spaces should preferably receive direct sunlight.

- 14.31 Camden Local Plan Policy A1 seeks inter alia to protect daylight/sunlight values within existing and proposed development. The text at paragraph 6.5 supporting Policy A1 states that in assessing daylight/sunlight values Camden will take into account the most recent guidance published by the Building Research Establishment (currently the Building Research Establishment's Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice 2011).
- 14.32 The Building Research Establishment (BRE) document Site Layout Planning for Daylight and Sunlight (2011) sets out guidance for achieving good sunlight and daylight levels within buildings and the open spaces between them.
- 14.33 The BRE guidelines are not mandatory, though local planning authorities will consider the suitability of a proposed scheme for a site within the context of BRE guidance. Consideration will be given to the urban context within which a scheme is located.
- 14.34 In regard to daylight and sunlight Camden's Amenity CPG states that they will:
- Expect all buildings to receive adequate daylight and sunlight.
  - Daylight and sunlight reports will be required where there is potential to reduce existing levels of daylight and sunlight.
  - Base our considerations on the Average Daylight Factor and Vertical Sky Component.

## **Assessment**

- 14.35 The following surroundings properties contain residential accommodation, or have a sensitive statues, and due to the proximity of the Proposed Development, have been assessed in terms of the effects of the Proposed Development upon their daylight and sunlight amenity:
- 29-55 Camden Gardens;
  - 1-28 Camden Gardens;
  - Barnes Housing, 9-15 Camden Road;
  - 3-5a Camden Road;

- 11-19 Kentish Town Road;
- United Reformed Church, Buck Street;
- 25 Kentish Town Road, 27 Kentish Town Road and the Hawley Infant Nursery School;
- Mansion Lock House, 13 Hawley Crescent;
- 29-31 Kentish Town Road;
- 33 Kentish Town Road;
- St Michael's Church.

14.36 A Daylight Sunlight Report assessing the Development Proposals insofar as it affects the daylight and sunlight amenity of the surrounding residential properties has been undertaken by Point 2 Surveyors. The report supporting the proposals, accompanies this application.

14.37 The analysis undertaken and set out within the within the report found that, owing partly to the Site's current, relatively low height, many of the neighbouring properties have come to benefit from unusually high levels of daylight amenity for their urban location.

14.38 However, the report finds that all the relevant properties affected by the development will either be fully BRE compliant, or within the reasonable tolerance permitted by the BRE. The Daylight Sunlight Report therefore concludes that the Development Proposals are acceptable in terms of its effect on the access to Daylight and Sunlight amenity.

## 15 Planning Obligations

- 15.1 Under Section 106 of the Town and Country Planning Act 1990, as amended, local planning authorities have the power to enter into planning obligations with any person interested in land in their area for the purpose of restricting or regulating the development or use of the land.
- 15.2 In accordance with Regulation 122 of the Community Infrastructure Levy Regulations 2010, as amended, and paragraph 56 of the NPPF, a planning obligation should only be sought where they meet all of the following tests:
- Necessary to make the Proposed Development acceptable in planning terms;
  - Directly related to the proposed development; and
  - Fairly and reasonably related in scale and kind to the proposed development.
- 15.3 Paragraph 56 of the NPPF indicates that planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.
- 15.4 On 6th April 2010, the Community Infrastructure Levy Regulations 2010 (as amended) came in to force to fund the provision, improvement, replacement or maintenance of infrastructure required to support development, as set out within each Local Authority's Regulation 123 list (a 'living' document which provides a summary of the infrastructure which CIL receipts should fund).
- 15.5 In accordance with Regulation 19 of the CIL Regulations 2010 (as amended), the London Borough of Camden submitted a Draft Charging Schedule for independent examination together with supporting evidence on 28 August 2014. The document provides guidance regarding the circumstances on which proposed developments will give rise to the need for the Council to seek contributions to infrastructure and how the various mechanisms, such as CIL, Crossrail SPG, separate Section 106 contributions and Section 278 agreements, will interplay in practice. The Charging Schedule was approved by Camden Council on 2 March 2015 and CIL Charging commenced on 1 April 2015.

- 15.6 The Applicant will enter into a legal agreement with the Council to secure the reasonable and necessary planning obligations associated with the Proposed Development in accordance with Regulation 122 of the CIL Regulations, Camden's Local Plan Policies C2 and DM1 and Camden's Planning Obligations SPG.
- 15.7 The final content and scope of planning obligations will be negotiated through the planning application process. However, it is anticipated that the S106 will provide for the following:
- Affordable housing;
  - Car free;
  - Construction management plan and implementation support contribution;
  - Energy Efficiency and Renewable Energy Plan;
  - Carbon offset contribution;
  - Employment and training contribution;
  - Local procurement and associated fee;
  - Service management plan;
  - Sustainability Plan; and
  - Travel plan and monitoring cost.

### **Community Infrastructure Levy**

- 15.8 As noted above LBC's CIL Charging Schedule came in to effect on 1 April 2015. It requires:
- £500 per square metre for schemes including residential below 10 dwellings (or 1000sqm);
  - £25 per square metre for schemes including retail (including bar/restaurant/entertainment and other town centre uses); and
  - £25 per square metre for schemes including office space.
- 15.9 Mayoral CIL is charged at £50 per square metre in Camden.

## 16 Summary and Conclusions

- 16.1 The Applicant instructed APA to design a scheme at 16-20 Kentish Town Road for partial demolition and redevelopment of the existing building and to provide a sustainable mix of uses incorporating high quality flexible office accommodation, a mix of active town centre uses such as shops, restaurants/cafes and/or leisure uses, with 100% of the affordable housing floorspace requirement, within a Central London and Town Centre location, and with regard to national, regional and local planning policy.
- 16.2 The existing unattractive, poor quality and inefficient building will be regenerated and the proposals present an opportunity to reinvigorate this important part of Camden Town. At a regional level, the London Plan prioritises development in locations which are well served by public transport. The Proposed Development has excellent public transport links being in the proximity of Camden Town Underground Station and the TfL proposed new entrance/exit on Buck Street.
- 16.3 The Site has the potential to accommodate a considerable amount of new office floorspace, and as a whole the development has the potential to provide up to 450 new jobs, as well as providing much needed affordable homes.
- 16.4 The Proposed Development helps to achieve the objectives of the Local Plan through:
- Creating a sustainable development which reuses an existing building and provides flexible office accommodation to meet a range of occupier requirements including SMEs;
  - Providing 6 much needed affordable homes with good residential amenity;
  - Providing active town centre uses within a secondary retail frontage enhancing the vitality and competitiveness of Camden Town Centre;
  - Providing a car free development which encourages use of public transport, in this accessible location, but also walking and cycling, enabling people to lead active and health lives; and
  - Creating a safe and secure environment for existing and future residents and workers.

- 16.5 The Proposed Development will create a distinctive place, appropriate for its location at the heart of Camden Town with public realm improvements and enhancements seeking to reduce the anti-social behaviour within the area.
- 16.6 The Proposed Development will make a significant contribution to both Camden and to London by improving pedestrian links east-west through Camden but also by offering an alternative attractive route north-south through Camden Town. The provision of active uses at ground floor level will improve the street environment both for those living in the area, but also for those that work there, offering more attractive places to spend time, as well as making the place more legible, safer and visually attractive.
- 16.7 The proposed mixed, balanced and sustainable Proposed Development will satisfy planning policies at all levels.



## Appendix A

Grand Union House, 16-20 Kentish Town Road, NW1 9NX

Date Received	Reference No.	Type of Application	Description	Decision	Date of Decision	Decision Notice?	Notes
10-09-1998	<a href="#">AE9800637</a>	Advertisement Consent	The erection of banner to ground floor shopfront. As shown on drawing Nos A, B, C and D	Grant Approval for Advertisement	15-10-1998	No	Unit 2
23-07-1996	<a href="#">P9601911</a>	Full Planning	Installation of a new shopfront and other minor alterations, as shown on drawing nos. KT101, 102, 103 and 104.	Grant Full Planning Permission	03-09-1996	Yes	Unit 2
24-06-1993	<a href="#">9300766</a>	Full planning	Change of use and works of conversion from retail and light industrial accommodation to provide a health club at first floor level and a shop and access at ground floor as shown on drawing nos. 92B4/S01 S02 P01 P02.	Grant Full or Outline Perm. with Condit.	26-10-1993	Yes	Unit 2
18-11-1992	<a href="#">9201296</a>	Full planning	The construction of a 100 seat cinema at ground level with works to include the re-arrangement of the access and parking accommodation as shown on drawings A B and C.	Grant Full or Outline Perm. with Condit	25-03-1993	Yes	20 Kentish Town Road
13-08-1992	<a href="#">9200997</a>	Full planning	Change of use and works of conversion of ground floor retail unit and first floor light industrial	Refuse Full or Outline Permission	27-01-1993	Yes	Suite 2 The proposed

			unit to a Lazer Games Centre within the meaning of Class D2 of the Town and Country Planning (Use Class) Order 1987 as shown on drawing numbers ABC/09/08 and ABC/W0/10 D.				development involves the loss of light industrial accommodation contrary to the policy of safeguarding such accommodation as expressed in the Greater London Development plan and the Written Statement of the London Borough of Camden Local Plan <b>1987</b> ( The Borough Plan).
10-08-1992	<a href="#">9280133</a>	Advertisement Consent	Display of an illuminated fascia sign measuring 9.5m x 1.2m x .3m four illuminated pillar signs measuring 3m x .4m x .5m and one illuminated fascia sign measuring 5m x .4 x .5m as shown on drawing number ABC/WO/10 D.	Refuse Full or Outline Permission	27-01-1993	Yes	Suite 2  The proposed advertisements by reason of their size, siting and number would have an adverse effect on the appearance of the building and the

							visual amenity of the area, and would neither preserve nor enhance the character of the Regents Canal Conservation Area.
10-06-1991	<a href="#">9180096</a>	Advertisement consent	Display of a wall mounted laquered steel sign measuring 4.1m x 1.75m located 1.1m above ground level and illuminated by an external static floodlight as shown on drawing numbers 1073.19 and 1073.13	Grant Approval for Advertisement	01-10-1991		18 Kentish Town Road
05-05-1987	<a href="#">8701006</a>	Full planning/S73	Amendment of planning permission dated 7th May 1986 (Reg no. 8600151R2) including the addition of an additional three storey house along the Canal frontage the conversion of the end house nearest Kentish Town Road into a bedsit and maisonette the reduction of car parking to provide 300 spaces and external alterations as shown on drawing numbers SK374	Grant Full or Outline Planning Permissn.	10-06-1987	Yes	ABC Bakery site (fronting 17-21 Camden Road 131 Camden Street Regents Canal from Kentish Town Road Bridge to Camden Bridge Kentish Town Road NW1)

			ABC SO 02 ABC 21 ABC 001 3A 07 SO 13E SO 15A HO 10C W0 10D and as described in your schedule dated 22/4/87of changes to details of approved planning permission and key to cladding notes.				
31-07- 1986	<a href="#">8601494</a>	Camden Dataload	The erection of six structural- support members on the public highway as shown on drawing no.ABC/SO/03/A	Grant Full or Outline Planning	23-10- 1986	Yes	ABC Bakery Site Camden Road/Camden Street NW1
25-04- 1986	<a href="#">8600151</a>	Reserved matters	(Reserved Matters) Redevelopment of the ABC Bakery Site south of the Regents Canal by the erection of buildings comprising:(a) A retail store fronting Camden Road. (b)An industrial/workshop building fronting Kentish Town Road.(c)A residential terrace fronting the Regents	Grant Appr.of Details/Res.Matters	30-04- 1986	No	ABC Bakery Site NW1: fronting 17- 21 Camden Road 131 Camden Street Regents Canal from Kentish Town Road Bridge to Camden Bridge Kentish Town Road
22-02- 1985	<a href="#">8570019</a>	Listed Building Consent	South site: partial demolition of rear block A in connection with the outline application: ^ South site: Refurbishment and redevelopment to provide accommodation for workshop	Withdrawn			ABC Bakery Site Camden Town NW1 (Site bounded by Camden Road Camden Street

			retail office recreation and social uses together with associated car parking spaces. ^ North				Camden Gardens and Kentish Town Road NW1)
22-02-1985	<a href="#">8500097</a>	Outline planning	Outline application for: ^ (i) North site:- residential and parking ^ (ii) South site : refurbishment and redevelopment including partial demolition to provide accommodation for workshop retail office recreation and social uses	Withdrawn			ABC Bakery Site Camden Town NW1 (Site bounded by Camden Road Camden Street Camden Gardens and Kentish Town Road)
19-12-1984	<a href="#">8401869</a>	Outline	Redevelopment of the land known as the ABC Bakery site (17-21 Camden Road 131-147 Camden Street Camden Gardens and frontage to Kentish Town Road NW1) by the erection of buildings comprising:- ^1. South Side of the Canal ^ (a) a retail store with associated creche	Grant Full or Outline Perm. with Condit	08-10-1985	Yes	ABC BAKERY SITE 17-21 Camden Road 131-147 Camden Street Camden Gardens and frontage to Kentish Town Road NW1
25-06-1984	<a href="#">8470177</a>	Listed Building Consent	Demolition in a Conservation Area.^As shown in drawing titled: Demolition Plan - ABC Site 2.	Refuse List.Build. or Cons Area Consent	12-02-1985	Yes	ABC Bakery Site NW1 (land bounded by Kentish Town Road Camden

							Gardens Camden Street and Camden Road)
24-05-1984	<a href="#">8400943</a>	Outline	Outline application for a mixed development of residential commercial studio workshops and ancilliary facilities retaining the existing bakery (Kentish Town Road building) and changingits use in part to commercial and residential and the enlargement of the	Refuse Full or Outline	06-02-1985	Yes	ABC Bakery Site NW1 (site bounded by Kentish Town Road Camden Gardens Camden Street and Camden Road)
19-12-1984	<a href="#">8470288</a>	Listed Building Consent	Demolition of the buildings on the ABC Site as shown on drawing nos. 7340/OPL/4 5 and 6.^Revised on 14th December 1984.	Grant List.Build. or Cons.Area Consent	03-04-1985	No	ABCBAKERYSITE 17-21 Camden Road 131-147 Camden Street Camden Gardens and a frontage on Kentish Town Road NW1
16-04-1984	<a href="#">8470102</a>	Listed Building Consent	Demolition in connection with the redevelopment of the site for retail (Class 1) and residential purposes with associated car parking and access arrangements * ( in outline only )	Withdrawn			Former ABC Bakery Site NW1

## Appendix B



London Plan Policies cited	Camden Local Plan Policies cited
2.15	E1
3.1	E2
3.3	A1
3.4	A2
3.5	TC1
3.8	TC2
3.9	TC4
3.11	TC5
3.10	H1
3.13	H2
4.1	H4
4.2	H7
4.3	D1
4.7	HC1
4.8	D2
5.2	CC1
5.3	CC2
5.6	
5.7	
5.11	
6.1	
6.3	
6.9	
6.10	
7.1	
7.4	
7.6	
7.11	
7.14	
7.15	