



GERALDEVE

Town Planning Statement

Acorn House, 314-320 Gray's Inn Road, King's Cross, London
WC1X 8DP

On behalf of: Precis Advisory & Access Self Storage Limited

Date: August 2020

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1 Introduction

- 1.1 This Town Planning Statement (the 'Statement') has been prepared by Gerald Eve LLP in support of an application for planning permission on behalf of our client Precis Advisory and Access Self Storage Limited (hereafter referred to as 'the Applicant') for the demolition and redevelopment of Acorn House, 314-320 Grays Inn Road, King's Cross, London WC1X 8DP (hereafter referred to as 'the Site' or 'Acorn House'), which is outlined in red on the Site Location Plan ref: 18102_A_(00)_001 Rev.P2. The Site is bound by Swinton Street to the north and Gray's Inn Road to the west.
- 1.2 The existing Site comprises a 6-storey mixed-use building on the south east corner of Swinton Street and Gray's Inn Road. Offices and a single residential unit are on the upper floors and a café/restaurant previously occupied the ground floor.
- 1.3 The proposed development would provide a new mixed-use scheme comprising 33affordable homes, affordable office workspace, retail use, private amenity space and associated landscaping works.
- 1.4 The application proposals are designed by architects Alford Hall Monaghan Morris Architects ('AHMM') and are described in Section 4 of this Statement, as well as in the Design and Access Statement, which is submitted in support of this application.

Applicant's Vision and Objectives

- 1.5 This application is linked to a planning application submitted in respect of Belgrove House, a 4 minute walk from the site. Acorn House is proposed to house affordable workspace and part of the affordable housing requirement that is generated by the uplift in commercial floorspace arising from the redevelopment of Belgrove House. A policy compliant payment in lieu of the remaining residential requirement would be secured in the S106 legal agreement which would link the two planning permissions.

Consultation

- 1.6 This Planning Application has been brought forward following detailed pre-application discussions with the London Borough of Camden ('LBC'). Pre-application discussions have also taken place with the Greater London Authority ('GLA'), Transport for London ('TfL'), Historic England, other statutory consultees as well as extensive consultation with the local community including amenity societies such as King's Cross

Neighbourhood Forum, King's Cross Development Forum, residents, businesses and landowners through a series of ongoing public consultations.

- 1.7 The Statutory Development Plan for the purposes of Section 38 (6) of the Planning and Compulsory Purchase Act (2004), and therefore the development plan, against which development within the LBC must be assessed includes the London Plan, being the Spatial Development Strategy for Greater London, adopted by the Mayor in March 2016. The Examination in Public (EiP) on the New London Plan was held between 15th January and 22nd May 2019. The Panel of Inspectors appointed by the Secretary of State issued their report and recommendations to the Mayor on 8th October 2019. As such policies contained within the Intend to Publish version of the New London Plan 2019 are of material weight in the determination of this Planning Application.
- 1.8 The Local Development Framework ('LDF') which consists of the Camden Local Plan, adopted on the 03 July 2017, the Local Plan Policies Map (updated March 2019), the Camden Site Allocations Plan (September 2013), Neighbourhood Plans and supplementary Camden Planning Guidance ('CPG') documents.
- 1.9 Full details of the public exhibition events and the applicant's ongoing community engagement are included in the Statement of Community involvement submitted with this application, prepared by London Communications Agency.

The Application

- 1.10 Planning permission is sought for the following works, referred to as 'the Proposed Development' in this Statement:

"Redevelopment of Acorn House as a part 6, part 10 storey building plus basement to provide 33no. affordable housing units with affordable office space and a retail unit at ground and basement level together with cycle parking facilities. An external playspace is proposed at level 6 and a community room with kitchenette and landscaped terrace for residents at level 9."

Herein after referred to as the "Planning Application".

- 1.11 This Statement forms part of a suite of documents that have been submitted in support of the Planning Application. The other application documents submitted in support of

the application for planning permission, which have been agreed with Camden Council, are:

- Covering Letter, prepared by Gerald Eve LLP;
- Community Infrastructure Levy 'Additional Information' Form, prepared by Gerald Eve;
- Site Location Plan; prepared by AHMM
- Site Plan; prepared by AHMM
- Existing and Proposed General Arrangement Plans, Sections and Elevations, prepared by AHMM;
- Demolition plans, prepared by AHMM;
- Health Impact Assessment; prepared by Trium;
- Statement of Community Involvement, prepared by London Communications Agency (LCA)
- Employment and Skills Strategy and Regeneration Statement, prepared by Volterra;
- Design and Access Statement, prepared by AHMM
- Acoustic and Vibration Assessment, prepared by Sandy Brown
- Energy and Sustainability Statement, and Whole Life Carbon Assessment (including BREEAM pre-assessment), prepared by Atelier 10;
- Affordable Housing Statement; prepared by Gerald Eve LLP;
- Air Quality Assessment, prepared by Air Quality Consultants (AQC);
- Basement Impact Assessment, prepared by AKTII;
- Flood Risk Assessment, prepared by AKTII;
- Drainage Strategy, prepared by AKTII;
- Townscape, Visual Impact and Heritage Assessment, prepared by Peter Stewart Consultancy;
- Daylight, Sunlight and Overshadowing Assessment, prepared by EB7;
- Biodiversity Survey and Report, prepared by PJC Consulting;
- Tree Survey, Arboricultural Impact Assessment, and Arboricultural Method Statement, prepared by PJC Consulting;
- Transport Assessment, prepared by TTP;
- Operational Waste Management Strategy, prepared by Waterman;
- Fire Safety Strategy, prepared by Bureau Veritas;
- Construction Management Plan, prepared by RPM;

- Archaeology Assessment, prepared by MOLA;
- Circular Economy Statement, prepared by Atelier 10; and
- Contaminated Land Assessment, prepared by Soiltechnics.

- 1.12 This Statement provides a comprehensive review of national, strategic and local planning policy and guidance relevant to the nature of the proposals. It assesses the degree to which the proposals accord with the policies of the statutory development plan and considers other material considerations, in accordance with the requirements of Section 38(6) of the Planning and Compulsory Purchase Act 2004.
- 1.13 The application for planning permission at Acorn House has been submitted simultaneously with the Belgrove House planning application (planning portal ref. PP-08993575) for parallel assessment and determination by Camden Council.
- 1.14 The Proposed Development is greater than 30 metres in height and located out the City of London. Therefore, the application is referable to the Mayor of London under Category 1C of Schedule Part 1, of the Town and Country Planning (Mayor of London) Order 2008.
- 1.15 The proposals have evolved considerably throughout the consultation process to address comments raised both in terms of the scheme itself and the supporting information. This is explained in more detail in the Statement of Community Involvement. The applicant has actively led each stage of the local consultation process.

2 Existing Site and Surrounding Area

- 2.1 This Section describes the Site's location and context in greater detail. The full extent of the Site is shown within the red line boundary of the Site Location Plan (ref. 18102_A_(00)_001 Rev.P2), submitted with this Planning Application.
- 2.2 The application site is located in the King's Cross region of the London Borough of Camden ('LBC'). The site is bounded by Swinton Street to the north, and Gray's Inn Road to the west. Gray's Inn Road and Swinton Street are busy one-way system traffic routes through the area and both comprise part of the A501, with both roads leading towards Euston Road and King's Cross St Pancras via the A501.
- 2.3 The existing building comprises a 6-storey mixed-use building on the south east corner of Swinton Street and Gray's Inn Road. Offices and a single residential unit are on the upper floors and a café/restaurant previously occupied the ground floor. The building is in a run-down state and is in need of redevelopment to allow for the effective use of the Site.
- 2.4 The existing building on site is not statutorily or locally listed. However, the Site is located within the Bloomsbury Conservation Area. The Bloomsbury Conservation Area covers an area of approximately 160 hectares extending from Euston Road in the north to High Holborn and Lincoln's Inn Fields in the south and from Tottenham Court Road in the west to King's Cross Road in the east.

Surrounding Context

- 2.5 The area surrounding the Site is characterised by a mix of uses including offices, hotel, residential, food & beverage, and healthcare uses. Its townscape is characterised by diversity, with buildings and streets varying in terms of scale, height, age, form and design.
- 2.6 The site is located within walking distance to some of London's major tourist attractions including King's Cross, St Pancras, Regent's Park, Camden Town and the British Library.
- 2.7 To the north of the Site is Swinton House comprising a hotel use, and the Royal National Throat, Nose and Ear Hospital further along Swinton Street, which is an allocated development site in Camden's Draft Site Allocations Document and is the

subject of pre-application discussions for a major mixed use redevelopment. Immediately to the east, 55-67 Swinton Street is Grade II listed and comprises hotel and residential uses. There are several other Grade II listed buildings in close proximity to the Site, including 51-53 Swinton Street, 35-49 Swinton Street and 36-42 Acton Street, 64-68 Acton Street, which are all located to the east of the Site. Immediately to the south is an existing office block, and to the west are a mix of uses including offices, residential and food & beverage uses.

- 2.8 The site is served closely by St Pancras International Station and King's Cross Station and the associated underground ('LUL') station ('King's Cross St Pancras'), which are situated approximately 450 metres to the north along Gray's Inn Road. St Pancras International Station has many connections and serves many regional and international locations including; Dover, Leicester, Nottingham, Sheffield and Paris plus many closer locations. King's Cross St Pancras LUL Station is served by the Northern line, Victoria line, Hammersmith and City line, Circle line and the Metropolitan line, making it the most connected station in the Capital. There are also a number of nearby bus routes and networks that surround the site, with the nearest bus stop Swinton Street being located approximately 50 metres to the north.
- 2.9 Based on the above, the site has excellent Public Transport Accessibility Level ('PTAL') with the highest rating of PTAL 6b.
- 2.10 There is a significant opportunity to optimise the potential of this currently underutilised site, in order to accommodate development which would create and sustain a mix of uses in an accessible location whilst taking into consideration the local heritage assets.
- 2.11 A full analysis of the physical opportunities and constraints of the Site is contained within the Design and Access Statement, prepared by AHMM Architects.

3 Relevant Planning History

- 3.1 An examination of Camden Council's online planning history has been undertaken and this Section sets out those planning applications that are considered of relevance. The planning history for the site is minimal and therefore this Statement includes applications that are minor in nature.
- 3.2 The most recent application (Ref. 2008/5882/P) at the site was for a minor material amendment to a previous application (ref. 2006/0856/P) which was granted on 03 April 2009 for the "Variation of condition 3 (to allow opening on Sundays between 10:00 and 16:00) of the planning permission dated 02/06/2006 (2006/0856/P) for change of use of ground floor from Class B1 use (office) to a mixed use comprising office (Class B1), consulting rooms (Class D1) and restaurant (Class A3), together with the erection of 2 extract ducts, the installation of new fire escape staircase, door and walkway to the rear ground floor elevation."
- 3.3 Planning permission (ref. 2006/0856/P) was granted on 02 June 2006 for the "Change of use of ground floor from Class B1 use (office) to a mixed use comprising office (Class B1), consulting rooms (Class D1) and restaurant (Class A3), together with the erection of 2 extract ducts, the installation of new fire escape staircase, door and walkway to the rear ground floor elevation."
- 3.4 Planning permission (ref. PSX0005218) was granted on 29 May 2001 for the "Replacing existing decorated metal windows and panels with powder coated aluminium double-glazed window units and lower powder coated aluminium panels. Render existing pre-cast concrete cladding panels. Replace existing lower flat roof with powder coated aluminium double glazed mono pitched roof to form light well. Remove existing partition to form open plan office areas".
- 3.5 The oldest relevant application (ref. 9606) relating to the site was a conditional approval for the on 08 October 1970 for the "The change of use of 1,100 sq. ft. of the ground floor of Acorn House, 314/320 Grays Inn Road, Camden, from showroom to office purposes".
- 3.6 This application would provide the opportunity to deliver much needed affordable homes and affordable workspace which would be beneficial to the local community,

residents, and workers in Camden, and would facilitate regeneration of the local area and wider London, both now and in the future.

4 Development Proposals

- 4.1 This statement should be read in conjunction with the Design and Access Statement and drawings produced by AHMM Architects for the Site, and all other technical assessment documents submitted with the applications as listed in Section 1 of this Statement.
- 4.2 The applicant appointed AHMM Architects to conceive a scheme of the highest architectural quality, for a residential-led mixed use development on the Site including enhanced private landscaping works.
- 4.3 The description of the proposed development is as follows:

“Redevelopment of Acorn House as a part 6, part 10 storey building to provide 33no. affordable housing units with affordable office space and a retail unit at ground and basement level together with cycle parking facilities. An external playspace is proposed at level 6 and a community room with kitchenette and landscaped terrace for residents at level 9.”
- 4.4 This application is linked to a planning application submitted in respect of Belgrove House, a 4 minute walk from the site. Acorn House is proposed to house affordable workspace and part of the affordable housing requirement that is generated by the uplift in commercial floorspace arising from the redevelopment of Belgrove House. A payment in lieu of the remaining residential requirement would be secured by legal agreement attached to the planning permission.
- 4.5 The scheme proposals are residential-led, delivering 100% affordable residential units at a tenure split of 60% social affordable rented and 40% intermediate rented, which would make a major contribution towards the identified affordable housing need in the London Borough of Camden.
- 4.6 In accordance with Camden Council’s policy objectives, the scheme also includes the provision of 476sqm (GIA) of affordable office workspace. This would provide an opportunity for local businesses and start-ups to occupy high-quality office space within the Core Activities Zone (‘CAZ’).
- 4.7 Furthermore, a retail unit is proposed at ground floor and basement level along Gray’s Inn Road and Swinton Street. There is an aspiration for the post office to be relocated from

Belgrove House to Acorn House. The applicant is in commercial discussions with the Post Office with regard to this.

- 4.8 A detailed assessment of the land uses proposed is included within the land use section, though Table 4.1 provides the existing and proposed areas in terms of the RICS definition of Gross Floorspace for GIA areas, split by land use.

Table 4.1 – Existing and Proposed Land Use Floor Areas

Land Use	Existing (RICS GIA sq. m)	Proposed (RICS GIA sq. m)	Net Change (RICS GIA sq. m)
A1 (Retail)	0	195	+195
B1 (Office)	2,823	476	-2,347
C3 (Residential)	70	3,469	+3,399
Total	2,893	4,140	+1,247

- 4.9 Due to the excellent transport accessibility, and in accordance with local and regional planning policy, the proposal is a car-free development. In terms of cycle parking, the proposal promotes 77 long-stay and 8 short-stay cycle parking spaces in accordance with the Intend to Publish Draft London Plan standards.

5 Consultation

- 5.1 This Section summarises the outcome of the consultation process, and how the proposed development has evolved in light of comments received during the pre-application process. For further details please refer to the Statement of Community Involvement.
- 5.2 Consultation is recognised as an essential tool for balancing the views and needs of different interest groups and securing mutually compatible solutions and as such has played an important role in the evolution and preparation of this Planning Application.
- 5.3 This Section seeks to outline the consultation strategy for the application proposals. A detailed Statement of Community Involvement ('SCI'), prepared by London Communications Agency, has also been submitted to support the proposal. Consultation for Acorn House was undertaken alongside the Belgrove House development and therefore a single SCI has been prepared.

Policy Context

- 5.4 The Localism Act 2011 emphasises the need for effective and meaningful pre-application consultation.
- 5.5 Paragraph 39-46 of the NPPF highlights the important of pre-application engagement and front loading; early engagement has significant potential to improve the efficiency and effectiveness of the planning system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improves outcomes for the community.

Consultation Strategy

- 5.6 The application proposals for the demolition and redevelopment of Acorn House have been consulted within Local Stakeholders since March 2020 (albeit consultation will continue post submission).
- 5.7 London Communications Agency have undertaken a phased programme of consultation which was undertaken remotely in light of the Covid-19 social-distancing requirements.

- 5.8 In March 2020, letters outlining the proposals were sent to a number of key stakeholders including ward councillors, relevant cabinet members and officers at Camden Council, community groups and local residents.
- 5.9 In April 2020, as this was proving challenging, the Applicant shifted its engagement strategy from a physical face-to-face engagement process to online. Meetings with key stakeholders were re-offered as virtual meetings. The Applicant also commissioned a filmed presentation of both emerging schemes which were sent to local groups on 20 April 2020.
- 5.10 On 4 June 2020, the Applicant posted the films on a dedicated consultation website (www.belgroveacorn.co.uk), and the consultation was promoted locally to people through the following ways:
- a) Consultation flyer delivered to 9,712 local households and businesses
 - b) Quarter page advert in the Camden New Journal
 - c) Advertising campaign on Facebook and Instagram
 - d) Virtual meetings with a number of local community groups.
- 5.11 The Statement of Community Involvement ('SCI') submitted with this application outlines the consultation strategy and the phases this has followed, which are:
- Autumn 2017 – In principle meetings with LB Camden
 - **October 2018** – More detailed pre-application discussions with LBC.
 - **June 2019** – Scheme first present to Design Review Panel
 - **February 2020** – Scheme presented in meetings to the GLA and Historic England.
 - **March 2020** – Began engaging with local stakeholder groups and close neighbours.
 - **April 2020** – Consultation website launched for local stakeholder groups and close neighbours, with video presentations of emerging designs for both buildings narrated by the lead project architect.
 - **Early June 2020** – Launch of the consultation website to the wider public and information on the emerging designs along with a feedback survey to submit comments.

- **Early June 2020** – Launch of a social media ad campaign promoting the consultation website run on Facebook and Instagram from Thursday 4 June until Thursday 19 June.
- **Late June 2020** – Development Management Forum (DMF) attended by 37 people and watched on Camden's YouTube channel by a further 200.
- **Late June 2020** – Presented to Camden's Design Review Panel (DRP), an expert panel of local architects and experts in the development field
- **Late July / early August 2020** – Virtual exhibition was held.
- **Late August 2020** – Submission of planning application to Camden Council.

5.12 Those consulted include:

- LBC Officers;
- LBC Design Review Panel Members;
- LBC Ward Councillors;
- LBC Development Control Committee Members;
- Greater London Authority (GLA);
- Historic England;
- Transport for London (TfL);
- The Metropolitan Police;
- Residents, Neighbours and Other Stakeholders; and
- Third Parties.

5.13 The proposals have evolved over the consultation period and have sought to accommodate, where possible, comments made during these consultations. These comments have included the scale, massing and design of the proposed building, and potential impact on neighbouring trees.

5.14 A summary of the consultation strategy is outlined below, and further details of comments received are contained within the supporting SCI, prepared by London Communications Agency.

Camden Council Officers

5.15 Extensive pre-application meetings have been held with planning and design officers from LBC since October 2018. Meetings have also been held with internal

departments at LBC such as Transport and Highways, Affordable Housing and Energy and Sustainability officers.

- 5.16 Regular and ongoing engagement with Officers at LBC has influenced the scheme evolution to develop a proposal supportable by Officers.
- 5.17 Iterations of the proposed design were subject to thorough review throughout the pre-application stage and the development proposals have evolved to incorporate comments received in relation to design wherever possible.
- 5.18 Further details on the design development and changes made as a result of pre-application discussions are included in the Design and Access Statement, prepared by AHMM architects.

Design Review Panel Members

- 5.19 Two Acorn House Design Review Panel ('DRP') meetings have been held at Camden Council Offices on 21 June 2019 and 25 October 2019. The review panels comprised 5 members alongside several key LBC Officers and who were generally supportive of the proposals and its design principles. The DRP held in June 2019 briefly discussed Acorn House in the context of providing a linked site to deliver affordable housing and affordable workspace as part of the Belgrove House development.
- 5.20 On 25 October 2019, the second Acorn House Design Review Panel was held, with Design Panel Review members; Jane Dann (Chair), Ian Chalk, Mike Martin, Paddy Pugh and Scott Grady.
- 5.21 Some comments were raised for the architectural team to investigate further. Key design comments related to the height, scale and massing, quality of residential accommodation, community garden room, and relationship of the building with Swinton Street.
- 5.22 On 26 June 2020, a third Design Review Panel was held with Design Review Panel members; Eleanor Fawcett (Chair), Mike Martin, Ian Chalk, Jane Dann and Paddy Pugh. The Panel offered their support for the progress made to the proposal for Acorn House, commended the provision of good quality affordable family housing, and welcomed the design efforts to overcome the difficulties of this challenging site.

Furthermore, the height and massing could be considered acceptable based on the provision of affordable housing.

- 5.23 The design team have sought to respond directly to the comments received at the DRP and the design has been amended accordingly. The Design and Access Statement, prepared by AHMM, sets out the design discussions held and shows how the proposed design has evolved in response to comments received

Residents, Neighbours and Other Stakeholders

- 5.24 The Applicant organised, publicised and carried out an online consultation programme instead of the originally intended strategy due to the implementation of the national lockdown brought on as a result of the Covid-19 pandemic. An online Development Management Forum (DMF) was also held, which resulted in 37 people attending on the evening of the event, and a further 203 views of the recorded event.
- 5.25 The purpose of the DMF was to familiarise local people with the proposals prior to submission and enable local residents, businesses and organisations to comment on the proposals.

Third Parties

- 5.26 As part of the pre-application process, the applicant met with the GLA on 26 February 2020 to discuss the application proposals. Belgrove House was the principle issue discussed with the Greater London Authority.
- 5.27 The formal response from the GLA was received on 13 March 2020. Comments were raised in relation to proposed land uses, sustainable development and transport, these have all be reviewed by the design team and taken into account during the development of the proposal.

Summary

- 5.28 The consultation strategy has sought to engage with statutory and non-statutory consultees including residents, local businesses, community groups and politicians throughout the design process.

- 5.29 The application proposals have been revised, where possible, to reflect comments raised throughout consultation, particularly in relation to the proposed building design, public open space and public realm and affordable housing.
- 5.30 The applicant remains committed to maintaining an open dialogue with locals and stakeholders throughout the determination and construction phases of the proposed development.

6 Planning Policy Framework

- 6.1 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.
- 6.2 The statutory development plan for the purposes of Section 38 (6) of the Planning and Compulsory Purchase Act 2004 comprises:
 - a. The London Plan. The London Plan presents the Mayor's spatial development strategy for London. This document has been consolidated with alterations since 2016. Hereinafter this will be referred to as the London Plan ('LP').
 - b. The Camden Local Development Framework ('LDF'). The LDF is made up of Camden's Local Plan (2017) and various adopted Camden Supplementary Planning Guidance documents.
- 6.3 In addition, decisions must accord with relevant legislation. Given the Site's location within a conservation area, statute regarding the historic environment is relevant.
- 6.4 Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of conservation areas.

National Guidance – National Planning Policy Framework ('NPPF') (2019)

- 6.5 The NPPF published in February 2019 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. Taken together, these policies articulate the Government's vision of sustainable development, which should be interpreted and applied locally to meet local aspirations.
- 6.6 The NPPF 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.

- 6.7 The NPPF establishes the presumption in favour of sustainable development. Specifically, paragraph 80 states that the planning system should do all that it can to create the conditions in which businesses can invest, expand and adapt. The NPPF states that significant weight should be placed on the need to support economic growth and productivity allowing each area to build on its strengths, counter any weaknesses and address the challenges of the future.
- 6.8 Section 11 of the NPPF sets out the importance of making effective use of land, with specific reference to proactively seeking the efficient development of brownfield land.
- 6.9 Section 12 of the NPPF states that the Government attaches great importance to the design of the built environment and that good design is a key aspect of sustainable development.
- 6.10 The NPPF is a material consideration in the determination of planning applications (paragraph 2).

Planning Practice Guidance ('PPG') (March 2014; as amended)

- 6.11 The Planning Practice Guidance was produced and published by the Department of Communities and Local Government ('DCLG') in March 2014 and has been varied and supplemented on number of occasions. .

Regional Planning Policy – The London Plan (The Spatial Development Strategy for London, consolidated with alterations since 2011) (adopted March 2016)

- 6.12 The London Plan (as amended, 2016) aims to set out a framework to co-ordinate and integrate economic, environmental, transport and social considerations over the next 20 years. The London Plan includes London-wide planning policy guidance and sets the relevant regional planning policy guidance for the London Borough of Camden and forms a component part of the statutory development plan.
- 6.13 The Mayor considers that the greatest challenge faced in London is to accommodate significant growth in ways that respect and improve London's diverse heritage while delivering the vision for an exemplary, sustainable world city.

The draft New London Plan (Intend to Publish)

- 6.14 The Examination in Public (EiP) on the London Plan was held between 15th January and 22nd May 2019. The Panel of Inspectors appointed by the Secretary of State issued their report and recommendations to the Mayor of London on 8th October 2019. This was considered by the Mayor and as such an Intend to Publish version was issued back to the Secretary of State on 9th December 2019. Given the late stages of the plan, the policies contained within the Intend to Publish version of the New London Plan are a material consideration in the determination of this application and we consider that they attract significant weight.

Local Planning Policy: Camden Local Plan (2017)

- 6.15 At the local level, Camden's Local Plan (2017) was adopted by Council on 3 July 2017 and has replaced the Core Strategy and Camden Development Policies documents as the basis for planning decisions and future development in the borough.

Local Draft Site Allocations Document

- 6.16 Consultation on the Camden draft site allocations document took place between 13th February and 27th March 2020. Acorn House is located in the wider Knowledge Quarter which is referenced in the document. The aspirations of the draft allocations have been taken into consideration in the assessment of the proposals.

Supplementary Planning Guidance

- 6.17 Other Camden Council Supplementary and Design Guidance of relevance to this application include:
- Camden Planning Guidance - Design (March 2019);
 - Camden Planning Guidance - Basements (March 2018);
 - Camden Planning Guidance (CPG2) - Housing (May 2006 updated March 2019);
 - Camden Planning Guidance - Employment Sites and Business Premises (March 2018);
 - Camden Planning Guidance 3 (CPG3) - Sustainability (July 2015, updated March 2018);

- Camden Planning Guidance - Energy Efficiency and Adaptation (March 2019);
- Camden Planning Guidance 6 - Amenity (September 2011, updated March 2018);
- Camden Planning Guidance - Air Quality (March 2019);
- Camden Planning Guidance - Transport (March 2019);
- Camden Planning Guidance - Trees (March 2019);
- Camden Planning Guidance - Developer Contributions (March 2019); and
- Camden Planning Guidance - Water and Flooding (March 2019).

6.18 The following GLA Supplementary Planning Guidance documents are also of consideration:

- i. Housing Supplementary Planning Guidance (SPG) (2016);
- ii. Affordable Housing and Viability SPG (2017)
- iii. Shaping Neighbourhoods: Character and Context (2014);
- iv. Shaping Neighbourhoods: Play and Informal Recreation SPG, (2012);
- v. Accessible London: Achieving an Inclusive Environment SPG (2014);
- vi. London's Foundations SPG (2012);
- vii. London View Management Framework SPG (2012);
- viii. Character and Context SPG (2014);
- ix. Sustainable Design and Construction SPG (2014);
- x. Mayor's Air Quality Strategy SPG (2010);
- xi. London Regional Flood Risk Appraisal – First Review (2014); and
- xii. The Control of Dust and Emissions During Construction and Demolition (2014).

Site Specific Allocations

6.19 Within the Camden Local Development Framework ('LDF'), the site falls within the following designations:

- Bloomsbury Conservation Area;
- Central Activities Zone;
- London View Management Framework view 2A.1 Parliament Hill to St Paul's viewing corridor.

Principal Planning Matters

6.20 The development proposals have been assessed against the following principal planning considerations:

- Land Use;
- Design;
- Heritage, Townscape and Views;
- Energy and Sustainability;
- Amenity;
- Transport and Servicing;
- Basement;
- Archaeology;
- Land Contamination; and
- Trees

7 Land Use

- 7.1 This Section assesses the proposals against relevant national, regional and local land use planning policies.

Residential

- 7.2 The Government's strategic objective as set out in the NPPF is to deliver a wide choice of high-quality homes and create sustainable, inclusive and mixed communities.
- 7.3 Chapter 5 of the NPPF supports the Government's objective of significantly boosting the supply of homes. Local planning authorities should plan for a mix of housing based on current and future demographic trends. They should also identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand.
- 7.4 Housing provision is a key priority of the London Plan, and policy 3.3 sets an annual housing target for the city of 42,000 net additional homes. It was noted by the Inspector at the Independent Examination of FALP (Further Alterations to the London Plan) that the revised housing targets proposed were short of what is necessary to address the housing crisis in London.
- 7.5 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.
- 7.6 The annual average housing target in the Intend to Publish London Plan remains at a similar level of 1,038 units compared to other boroughs which have seen a significant increase in their targets. However, Camden Council seek to deliver housing above the Intend to Publish Draft London Plan targets and set out an ambitious target of 1,120 new homes per annum under Policy H1 of the Local Plan.
- 7.7 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.

- 7.8 Draft Policy H10 of the Intend to Publish Draft London Plan continues to emphasise that schemes should generally consist of a range of unit sizes. However, when determining the mix of unit sizes, applicants and decision-makers should have regard to a number of factors which include the nature and location of the site, with a higher proportion of one and two bed units generally more appropriate in locations which are closer to a town centre or station or with high public transport access and connectivity.
- 7.9 The GLA's Housing SPG sets out standards which new residential units should achieve.
- 7.10 At a local level, 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 2016/17-2030/31, including 11,130 additional self-contained homes.
- 7.11 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.
- 7.12 Camden Local Plan Policy H4 sets out that the Council aim to provide a variety of housing suitable for Camden's existing and future households, having regard to household type, size, income and any particular housing needs.
- 7.13 Camden Planning Guidance on Interim Housing (2019) provides specific guidance on both housing and affordable housing in mixed use development and specifically the requirements of Local Plan Policies H2, H4, and H6.

Housing Quantum

- 7.14 The proposals seek to provide a total of 33 affordable residential units in a highly sustainable location.

- 7.15 The proposed residential units would assist in delivering much needed housing in Camden and London as a whole. Therefore, the proposed delivery of housing is in accordance with national, regional and local planning policies.

Housing Size and Mix

- 7.16 The Council considers that housing developments need to provide an appropriate mix of units, in terms of unit size, type and tenure, including social and intermediate housing provision, to address Camden's housing requirements.
- 7.17 The proposed unit and tenure mix across the proposed development is provided in Table 7.1.

Table 7.1 – Proposed Residential Unit/Tenure Mix

Tenure	1-bed	2-bed	3-bed	4-bed
Social Affordable	5	8	5	1
Intermediate	7	7	0	0
Total	12	15	5	1
% Mix	36	46	15	3

- 7.18 As demonstrated in Table 7.1 there would be a provision of 36% 1-beds, 46% 2-beds, and 18% family-sized units across the proposed development. All the family-sized units would fall under Social-Affordable Rent tenure.
- 7.19 The proposed development seeks to provide an appropriate mix of unit types across the Site based on the site's location and the suitability for more 1 and 2-bed units in the heart of the King's Cross Area. Due to the Site's location and constraints, a lower provision of family-sized units is considered acceptable based on the higher proportion of 2-bed units provided.

Wheelchair Housing

- 7.20 The London Plan Housing SPG requires 10% of the total number of residential units to be designed to be wheelchair adaptable.
- 7.21 Three residential units have been designed to be wheelchair accessible or adaptable as per Building Regulations Requirements M4(3), these are to be large 1B:2P units in accordance with LBC's advice.

Housing Quality

- 7.22 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).
- 7.23 The proposed residential units have been designed and planned to comply with the requirements.
- 7.24 The minimum space standards set out at London Plan Policy 3.5 are exceeded for the proposed housing.
- 7.25 It is proposed that the majority of the residential units would be dual aspect and would have good daylight levels, with all units having good floor-to-ceiling heights. The report on Daylight and Sunlight, prepared by EB7, demonstrates that the units would receive good levels of sunlight and daylight. This is discussed in further detail in Section 14 of this Planning Statement.
- 7.26 It is considered that the proposed residential units would be of good design quality. This is set out in more detail within the Design and Access Statement prepared by AHMM.

Amenity and Playspace

- 7.27 London Plan Policy 3.6 requires new development to make provision for play and informal recreation based on the expected child population and an assessment of

future needs. A methodology for ascertaining the likely child occupancy level of a new development is set out in the Mayor's SPG Providing for Children and Young People's Play and Informal Recreation.

- 7.28 Draft Policy S4 of the Intend to Publish Draft London Plan states that **“development proposals for schemes that are likely to be used by children and young people should... *inter alia*... for residential developments, incorporate good quality, accessible play provision for all ages. At least 10 square metres of playspace should be provided per child...”**.
- 7.29 At a local level, Camden Local Plan Policy A2 states that the Council will apply a standard for open space of 9sqm per occupant for residential schemes and give priority to play facilities and the provision of amenity space which meet residents' needs where a development creates a need for different types of open space. Development contributions for open space enhancements using S106 are also considered appropriate.
- 7.30 External amenity space would be provided in the form of Balconies, Winter Gardens, Children's Playspace, and a Community Terrace.
- 7.31 Based on an Inner London location with a PTAL of 5-6, the child yield calculations using the GLA child yield and play space calculator results in the total children yield of 23.4 and therefore a requirement of 234.3 sqm playspace.
- 7.32 Due to the site constraints, a provision of 86 sqm children playspace is provided which is located on level 6 of the proposed building. It is understood that this provides an overall shortfall when assessed against the GLA calculator. A payment in lieu would be provided as part of the S106 Agreement to mitigate the shortfall.

Affordable Housing

- 7.33 Central Government through changes to the NPPF and PPG are actively encouraging the delivery of affordable housing to assist with the growing demand. Paragraph 59 of the NPPF sets out that sufficient amount and variety of land can come forward where it is needed to boost the supply of housing, which also addressed the needs of groups with specific housing requirements.
- 7.34 The Mayor of London has a clear objective to deliver affordable housing in the City to meet all housing needs. Policy 3.11 of the London Plan sets out that Mayor seeks to

deliver at least 17,000 more affordable homes per year in London. **“In order to give impetus to a strong and diverse intermediate housing sector, 60% of the affordable housing provision should be for social and affordable rent, and 40% for intermediate rent or sale. Priority should be accorded to provision of affordable family housing.”**

- 7.35 This approach is expanded upon within the Mayor’s published Affordable Housing and Financial Viability SPG (August 2017).
- 7.36 The SPG sets out the threshold approach to applications. The **‘fast track route’** is where applications meet or exceed the 35% threshold for affordable housing. Section Two of the SPG states that “applications will not be required to provide viability information, nor be subject to review mechanisms provided an agreed level of progress is made following the grant of planning permission, where they:
- “deliver at least 35% affordable housing on-site without public subsidy;
 - are consistent with the relevant tenure split and meet other obligations and requirements to the satisfaction of the LPA and the Mayor where relevant; and
 - have sought to increase the level of affordable housing beyond 35% by accessing grant” (page 17 of the SPG).
- 7.37 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.
- 7.38 The Intend to Publish Draft London Plan has a strategic objective to deliver more genuinely affordable housing, with an identified need for circa 43,500 affordable homes per year.
- 7.39 At a local level, 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.

- 7.40 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.
- 7.41 Policy H4 (e) goes on to state that an affordable housing target of 50% applies to developments with a capacity for 25 or more additional dwellings.
- 7.42 Policy H4 sets out that the guideline mix of affordable housing types is 60% social rented housing and 40% intermediate housing.

Assessment

- 7.43 The total additional non-residential floorspace proposed across both the Belgrove House and Acorn House sites is 10,988 sq.m and therefore this represents the off-site housing target. The amount of housing being proposed at Acorn House is 3,412 sq.m, across 33 units, which represents 31% of the housing requirement. All the housing proposed at Acorn House is affordable. A policy compliant payment in lieu of £9.86 million to the Council's affordable housing fund would be secured via Section 106 Legal Agreement. The payment is in lieu of the shortfall in the physical delivery of market and affordable housing.
- 7.44 Throughout the pre-application process, a number of redevelopment proposals were presented to LB Camden as detailed in the Design and Access Statement which proposed a taller building of greater scale and massing and which proposed a higher quantum of units at Acorn House. Owing to the constraints on massing at the site when balanced with the surrounding context and the historic setting, 33 no. units is the maximum number of units achievable on site.
- 7.45 It is accepted by Officers that this is the maximum amount of affordable housing that could be provided on this site.
- 7.46 100% of the housing proposed at Acorn House would be affordable and would be delivered in partnership with a registered provider. The proposed number of units and unit/tenure mix is set out in Table 7.1.
- 7.47 In terms of tenure mix, the proposal seeks to provide 60% as social affordable rent and 40% as intermediate rent as agreed with LBC's housing officers. All the affordable

units would be provided within the upper floors of the proposed building. This meets the Camden policy requirement of a 60:40 (social rented:intermediate rent) split.

- 7.48 Pre-application discussion have been held with Camden and the GLA in relation to the affordable housing provision. Both authorities have agreed that the proposed affordable housing provision and tenure split is acceptable in principle and welcomed.
- 7.49 As the proposed affordable housing offer complies with both Camden and GLA policy requirement in terms of quantum and tenure and policy compliant payment in lieu of the shortfall no financial viability material has been submitted.

Summary

- 7.50 The scheme proposals would deliver high quality new affordable housing in accordance with LBC's policy requirements on quantum and mix.
- 7.51 The proposal meets the requirements for the 'fast track route' as set out within the Mayor's Affordable Housing and Viability SPG 2017 and Policy H5 of the draft New London Plan. As a result, no viability assessment is required as part of the application submission. This approach has been agreed with LBC officers and the GLA. Furthermore, we are making a policy compliant contribution to the Affordable Housing Fund,
- 7.52 The Affordable Rent units comprise the larger homes with 6 of the 17 affordable homes being family sized. The Intermediate Rent units include smaller house types. The proposed distribution of tenures and housing mix has been discussed with LBC's housing officers and is understood to best reflect evidences housing need.
- 7.53 Based on the proposed affordable housing provision, and following agreement from the GLA and LBC, we consider the affordable housing provision to be in full accordance with the relevant London Plan and LBC Policies, and in delivering major new affordable housing in Camden, it is a significant public benefit associated with the scheme.

Office

- 7.54 At a national level, the NPPF sets out the Government's commitment to securing economic growth and advises that plans should support an economy fit for the twenty first century. Paragraph 80 of the NPPF states that [inter alia] significant weight should

be placed on the need to support economic growth and productivity, taking into account wider opportunities for development.

- 7.55 The Ministerial Planning for Growth Statement, March 2011, notes the importance of securing economic growth and employment. The guidance considers that Local Planning Authorities should consider the importance of national planning policies aimed at fostering economic growth and employment, given the need to ensure a return to robust growth after the recent recession and consider the range of likely economic, environmental and social benefits of proposals; including long term indirect benefits such as increased consumer choice, more viable communities and more robust local economies.
- 7.56 At a regional level, The London Plan identifies the Site as a location where office use is supported. The London Plan recognises that the CAZ is the country's most important strategic office location. Policy 2.10 recognises the CAZ as being at the heart of London's world city offer and identifies a strategic priority to promote and coordinate development to provide a competitive, integrated and varied global business location. Whilst Policy 2.11 aims to ensure that development proposals increase office floorspace within CAZ.
- 7.57 Policy 4.1 of the London Plan seeks to promote a stable and strong economy across all parts of London. Likewise, policy 4.2 encourages boroughs to **"support the management and mixed-use development and redevelopment of office provision."**, whilst Policy 4.2(d) specifically supports increases in current stock where evidence of sustained demand exists.
- 7.58 The Intend to Publish Draft London Plan Policy E1 (D) states that the diverse office markets in outer and inner London where viable should be extended, focusing new development in town centres and other existing office clusters supported by improvements to walking, cycling and public transport connectivity and capacity.
- 7.59 Intend to Publish Draft London Plan Policy E2 (D) states that development proposals for new B Use Class business floorspace greater than 2,500 sqm (gross external area), should consider the scope to provide a proportion of flexible workspace or smaller units suitable for micro, small and medium-sized enterprises.
- 7.60 Intend to Publish Draft London Plan Policy E1 (A) states that [inter alia] improvements to the quality, flexibility and adaptability of office space of different sizes (for micro,

small, medium-sized and larger enterprises) should be supported by new office provision, refurbishment and mixed use development.

- 7.61 At a local level, Camden Local Plan Policy E1 explains that the Council will secure a successful and inclusive economy in Camden by creating the conditions for economic growth and harnessing the benefits for local residents and businesses. 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. Supporting paragraph 5.40 makes specific reference to the provision of affordable workspaces being particularly welcomed.

Consideration is also given to the Employment Sites and Business Premises CPG (2018) which sets out that major developments may require the inclusion of affordable workspace via a S106 Agreement.

Assessment

- 7.62 The site's accessible and strategic location in the CAZ and close proximity to areas requiring business and employment floorspace including King's Cross and St Pancras, and location within the Knowledge Quarter, support the need for commercial office (Class B1) floorspace and other employment generating uses at the site.
- 7.63 Whilst the proposed development would lead to a loss in office floorspace at Acorn House, and therefore contrary to Policy E1, the office floorspace proposed at Acorn House, together with the uplift in commercial floorspace at Belgrove House (linked application) would provide a total of 24,634 sqm (GIA) (overall uplift of 21,811 sqm) of high quality flexible office, laboratory and laboratory enabled floorspace in Camden which would significantly assist in meeting the strategic functions of the CAZ and Camden Knowledge Quarter, and the current demand for office floorspace in the borough and the city.
- 7.64 Due to the provision of 24,158sqm (GIA) floorspace at Belgrove House and the proposed affordable workspace at the Site this would assist in meeting the requirements set out in the Intend to Publish Draft London Plan Policy E2.

- 7.65 The scheme proposes the provision of 476sqm (GIA) affordable workspace as part of the mixed-use development which seeks to meet the policy aspirations of the Employment Sites and Business Premises CPG. This would be located on the lower ground and ground floor level and would have separate access arrangements to the residential located on the upper levels. The overall floor area for the affordable workspace is 476sqm in order to maximise the amount of affordable housing achievable on Site.
- 7.66 The proposed affordable workspace would be provided at a lower market rent and is a less formal space aimed at start-up businesses. Pedestrian access would be from Gray's Inn Road into a dedicated reception space with lift and stair access to the lower ground level.
- 7.67 The proposed scheme would provide high quality affordable workspace and would assist in promoting an increase of commercial floorspace in the CAZ as well as Camden. Therefore, the proposed office floorspace accords with the relevant regional and local planning policies, and with the Employment Sites and Business Premises CPG.

Retail

- 7.68 Paragraph 85 of the NPPF seeks to promote “positive, competitive” town centre environments and to direct retail development to town centres in the first instance, recognising town centres as the heart of their communities.
- 7.69 Policies within the London Plan are supportive of ancillary retail facilities for their role as a component for mixed use development, and their contribution to increasing the vitality at street level. London Plan policy 2.11 seeks to identify, enhance and expand retail capacity to meet strategic and local need within the CAZ, particularly in identified CAZ frontages. London Plan policy 4.7 states that retail, commercial, culture and leisure development should be focused on sites within town centres, or if no in-centre sites are available, on sites on the edges of centres that are, or can be, well integrated with the existing centre and public transport.
- 7.70 Supporting text to the Intend to Publish Draft London Plan recognises the structural changes affecting the retail sector currently and encourages boroughs to plan

proactively to accommodate future demand and manage the transition of surplus retail to other uses (paragraph 6.9.3).

- 7.71 At a local level, Local Plan Policy E1 part (i) recognises the importance of other employment generating uses, including retail uses.
- 7.72 Local Plan Policy G1 demonstrates the Council's ambition to create the conditions for growth to deliver the homes, jobs, infrastructure and facilities to meet Camden's identified needs and harness the benefits for those who live and work in the borough. The Council will deliver growth by securing high quality development and promoting the most efficient use of land and buildings in Camden by supporting development that makes the best use of its site and supporting a mix of uses on site where it can be demonstrated that this contributes towards achieving the strategic objectives and delivers the greatest benefit to the key priorities of the Plan.

Assessment

- 7.73 The scheme proposes a 190sqm (GIA) retail unit at lower ground and ground level. The retail space would be located at the corner of the building and aims to activate the junction of Gray's Inn Road and Swinton Street. The Site is located within the CAZ which is an appropriate location for retail use.
- 7.74 The proposal would provide a retail facility as part of the mixed use development whilst increasing the vitality and function of the street scene at ground floor level.
- 7.75 The provision of a retail unit in this location would be a benefit to the economy and a positive provision for the nearby residents and other commercial uses. There is an aspiration for the post office to be relocated from Belgrove House to Acorn House. The applicant is currently in commercial discussions with the Post Office in respect of this.
- 7.76 The proposed retail unit is considered acceptable and in accordance with the NPPF, London Plan Policy 2.11, and Local Plan Policy G1.

Mixed-Use

- 7.77 Promoting mixed-use development is one of the core principles of the NPPF, which suggests at paragraph 91 that mixed use developments can promote healthy communities.
- 7.78 Chapter 11 of the NPPF seeks to promote the effective use of land in meeting the needs for homes as well as other uses. Paragraph 118 sets out that planning decisions should encourage multiple benefits from mixed-use schemes whilst also giving substantial weight to suitable brownfield land.
- 7.79 Policy 4.3 of the London Plan sets out that developments in the CAZ which include an increase in office floorspace should also promote a mix of uses including housing. Policy GG2 of The Intend to Publish Draft London Plan seeks to enable mixed-use development on brownfield land and prioritising sites which are well-connected by existing or planned public transport. In addition, a development should **“proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling”**.
- 7.80 At a local level, Policy H2 of the Local Plan states that where non-residential development is proposed the Council will promote and encourage the inclusion of self-contained homes as part of a mix of uses in all parts of the borough.

Assessment

- 7.81 The scheme proposes a residential-led mixed use development comprising affordable housing, affordable workspace and a retail unit.
- 7.82 The Site is in a poor state of repair and the proposed scheme would provide an appropriate mixed-use development on a suitable brownfield site with excellent accessibility. The proposal would provide a number of substantial benefits including the provision of much needed affordable housing, appropriate amenity space for future occupants, a retail unit at ground level to activate the street scene, and provision of an affordable workspace to aid start-up businesses.
- 7.83 The Belgrove House Site located along Euston Road seeks to promote an overall increase in the commercial floorspace when assessing both Sites. The provision of affordable housing

at Acorn House assists in promoting a mix of uses between the two Sites which are within a short walking distance of each other.

- 7.84 The mixed use proposal is considered appropriate for the Site and is in accordance with the NPPF, Policy 4.3 of the London Plan, Policy GG2 of the Intend to Publish London Plan, and Policy H2 of the Local Plan.

9 Design

- 9.1 This Section reviews the proposals against relevant national, regional and local planning policy in term of design.
- 9.2 The Government has attached great importance to the design of the built environment in the NPPF with a presumption in favour of sustainable development.

National Planning Policy Framework (2019)

- 9.3 At a national level the NPPF stipulates that it is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes (Chapter 12).
- 9.4 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.
- 9.5 Paragraph 127 of the NPPF states that development should function well and add to the overall quality of the area over the lifetime 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.
- 9.6 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.
- 9.7 The NPPF identifies that securing high quality and inclusive design goes beyond aesthetic considerations. Therefore, planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment (Paragraph 185).

Planning Practice Guidance

- 9.8 Paragraph 4 of the PPG on Design (2019), states that local planning authorities are required to take design into 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).

9.9 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.

The London Plan (2016)

9.10 At a regional level, 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.

9.11 Policies 5.3 and 7.2 of the London Plan seek development to meet the highest standards of sustainable and accessible design and construction, to improve the environmental performance of new development and to adapt to the effects of climate change over their lifetime.

9.12 London Plan Policies 7.4 and 7.5 seek to ensure that development respects the local character of the area; promotes high quality public realm; and ensures that the

architecture makes a positive contribution to a coherent public realm, streetscape and wider cityscape.

9.13 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:

- 1) Of the highest architectural quality;
- 2) Of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm;
- 3) Comprise details and materials that complement;
- 4) Incorporate best practice in resource management and climate change mitigation; and
- 5) Meet the principles of inclusive design.

'Intend to Publish' version of the Draft New London Plan (2019)

- 9.14 The 'Intend to Publish' version of the draft New London Plan policy D4 – Delivering good design, states that the design of development proposals should be thoroughly scrutinised. The scrutiny of a proposed development's design should cover its layout, scale, height, density, land uses, materials, architectural treatment, detailing and landscaping. The Design and Access Statement should explain the approach taken to these design issues.
- 9.15 Policy D5 relating to Inclusive Design requires development proposals to achieve the highest standards of accessible and inclusive design. Design and Access Statements for development proposals should include an inclusive Design Statement. When dealing with historic buildings and heritage assets, careful consideration should be given to inclusive design at an early stage.
- 9.16 Policy SI 7 Reducing Waste and supporting the circular economy seeks to promote a more circular economy that improves resource efficiency and innovation to keep products and materials at their highest use for as long as possible. The policy required referable applications to submit a standalone Circular Economy Statement.

Camden Local Plan (2017)

9.17 At a local level, Camden Local Plan Policy D1 seeks to secure high quality design in development and to ensure that new developments are attractive, safe and easy to use. To achieve this, Camden will require that development:

- a) respects local context and character;
- b) preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;
- c) is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;
- d) is of sustainable and durable construction and adaptable to different activities and land uses;
- e) comprises details and materials that are of high quality and complement the local character;
- f) integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;
- g) is inclusive and accessible for all;
- h) promotes health;
- i) is secure and designed to minimise crime and antisocial behaviour;
- j) responds to natural features and preserves gardens and other open space;
- k) incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping,
- l) incorporates outdoor amenity space;
- m) preserves strategic and local views;
- n) for housing, provides a high standard of accommodation; and
- o) carefully integrates building services equipment.

9.18 This policy reflects the London Plan design and principles and goes on to state that the Council will require all developments to be of the highest standard of design and will expect developments to consider:

- a) The character, setting, context and form and scale of neighbouring buildings;
- b) The quality of materials to be used;
- c) The provision of visually interesting frontages at street level;

- d) The appropriate location for building services equipment;
- e) The provision of appropriate hard and soft landscaping; and
- f) The provision of appropriate amenity space.

9.19 Camden has also published a Planning Guidance SPD (March 2019) which establishes design principles to be used in the assessment of development proposals. The document reinforces or where necessary amplifies existing guidance and defines the Council's expectations for new buildings, as positive and enduring additions to this unique urban landscape. The key messages are to consider:

- a) The context of a development and its surrounding area;
- b) The design of the building itself;
- c) The use and function of the building;
- d) Using good quality sustainable materials;
- e) Creating well connected public spaces and good quality public realm;
- f) Opportunities for promoting health and wellbeing; and
- g) Opportunities for improving the character and quality of an area.

Assessment

- 9.20 This Section provides an assessment of design matters in the context of relevant policies, though a comprehensive commentary regarding the design approach and development is provided within the Design and Access Statement prepared by AHMM.
- 9.21 The design of the proposal has been carefully considered throughout the pre-application stage and is the result of a detailed process with input from LBC officers and other stakeholders. The height and massing for the proposal has been materially altered through the pre-application process in response to detailed engagement with officers in relation to relationship with neighbouring buildings and impact within the Conservation Area.
- 9.22 In line with Camden Local Plan Policy D1 and the LBC Design CPG, the proposed works have been designed to the highest quality.
- 9.23 The proposal involves the redevelopment of the Site with the erection of a part six, part ten storey building. The design of the proposed building has been considered

very carefully in context of neighbouring buildings and also its location within the Bloomsbury Conservation Area.

- 9.24 The proposed development has been stepped down to 6 storeys along Swinton Street to respond to the varying building scales on Gray's Inn Road and Swinton Street. The reduction in the building volume also creates a more sympathetic party wall condition and provides appropriate space for an enclosed children's playspace.

- 9.25 When assessed along Gray's Inn Road, there are a number of larger civic buildings located in this area of up to eight storeys in height. The proposal fits into this context of larger civic buildings whilst also taken account of the busy street with the inclusion of winter gardens as an appropriate residential amenity space.

- 9.26 To define the massing of the proposed building, a series of vertical recesses and linear ribbon windows have been designed which will help to break up the building volume and provide horizontal emphasis of the building form. At ground level, the design has incorporated different approaches to assist in defining the various land use accesses and activating the street frontage and enhancing the streetscape along Gray's Inn Road and Swinton Street.

- 9.27 The materiality of the proposed development has been carefully considered in the context of the surrounding buildings and conservation area. It is envisaged that the materials would be red-toned brickwork in dark, mid and light-coloured shades in order to blend into the background of the townscape whilst providing a facing material of high quality.

- 9.28 Careful consideration has been taken to incorporate sustainable measures where possible. The proposal includes, inter alia, the re-use and recycling of materials, reduction in energy consumption, sustainable transport initiatives, improvements in ecology, and SUDS management.

- 9.29 An appropriate provision of amenity space has been provided within the proposal. Each residential unit has been provided with a balcony or winter garden. Further amenity space has also been provided in the form of a community terrace on the ninth storey and also a children's playspace on the seventh storey. A provision of amenity space has also been provided for the proposed affordable workspace with an external courtyard at Lower Ground Floor.

- 9.30 In terms of accessibility, the streetscene has been activated through the provision of appropriately designed entrances for the proposed uses on the Site. In addition, lift access is proposed to all levels of the proposed building and all residential units are accessible or adaptable as described in Approved Document M4(2).
- 9.31 Mechanical Plant space has been proposed at basement level to reduce noise impact on future and neighbouring occupiers, and to also reduce the visual impact such equipment would have on the surrounding street scene. Solar PV Panels have been proposed on the roof and would not be visible from ground level.
- 9.32 Overall, the proposed development creates an appropriate design in the location that enhances the area's character through respectful and intelligent design. The scheme design successfully integrates the built form with the surrounding street scene, with a form and materiality which respects and enhances the character and appearance of the Bloomsbury Conservation Area.
- 9.33 The proposed development fully accords with the design policies and aspirations of national, regional, and local policy.

10 Heritage, Townscape and Views

- 10.1 This Section considers the Proposed Development against relevant national, regional and local heritage planning policy and guidance relating to designated heritage assets, archaeology and townscape. This Section also considers the Proposed Development in respect of townscape views and impact on heritage assets, including Bloomsbury Conservation Area.
- 10.2 A full analysis of the impact of the proposed development on designated heritage assets is included within the submitted Townscape, Visual Impact and Heritage Assessment (“TVIHA”), prepared by Peter Stewart Consultancy and Miller Hare and submitted as part of the application and should be read alongside this Section of this Statement.

Policy and Statutory Context

- 10.3 Section 66(1) states that in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
- 10.4 Section 72 of the 1990 Act also provides that, in respect of development affecting conservation areas, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.
- 10.5 The Government has attached great importance to conserving and enhancing the historic environment at Chapter 16 of the NPPF.
- 10.6 Paragraph 187 of the NPPF sets out that local planning authorities should maintain, or have access to a historic environment record containing up to date evidence to assess the significance of heritage assets and the contribution they make, and predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future.
- 10.7 Paragraph 189 of the NPPF states that 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. 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.

- 10.8 As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.
- 10.9 Paragraph 192 of the NPPF states that in determining planning applications, local planning authorities should take account of:
 - The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - The positive contribution that conservation of heritage assets can make to sustainable communities including their economic viability; and
 - The desirability of new development making a positive contribution to local character and distinctiveness.
- 10.10 Paragraph 193 states that, when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
- 10.11 Paragraph 196 of the NPPF states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
- 10.12 The NPPG on Conserving and Enhancing the Historic Environment provides further guidance in assessing the impact of development proposals which effect heritage assets. It sets out that "significance" derives not only from a heritage asset's physical presence, but also from its setting. It sets out that "Public Benefits" may follow from

many developments and could be anything that delivers economic, social or environmental objectives as described at Paragraph 8 of the NPPF.

- 10.13 London Plan Policy 2.10 seeks to sustain and enhance the distinctive environment and heritage of the CAZ, recognising both its strategic components and other features including distinctive buildings and historic heritage, through high quality design and urban management.
- 10.14 London Plan Policy 7.8 states that development should identify, value, conserve, restore and reuse and incorporate heritage assets where appropriate. Development which affects heritage assets should conserve their significance by being sympathetic to their form, scale, materials and architectural detail.
- 10.15 The policy goes on to state that new development should make provision for the protection of archaeological resources, landscapes and significant memorials. The physical assets should, where possible be made available to the public on-site. Where the archaeological or memorial assets cannot be preserved or managed on-site, provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset. This position is supported at draft policy HC1 of the New London Plan.
- 10.16 London Plan Policy 7.12 states new development should not harm, and where possible should make a positive contribution to, the characteristics and composition of the strategic views and their landmark elements. Development in the foreground and middle ground of a designated view should not be overly intrusive, unsightly or prominent to the detriment of the view.
- 10.17 Policy D2 of the Local Plan states that the Council will preserve and where appropriate, enhance Camden's rich and diverse heritage assets and their settings. In respect of designated heritage assets, the Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage assets unless the public benefits of the proposal convincingly outweigh that harm.
- 10.18 In respect of archaeology, the policy states that the Council will protect remains of archaeological importance by ensuring acceptable measures are taken proportionate to the significance of the heritage asset to preserve them and their setting, including physical preservation, where appropriate.

- 10.19 The Bloomsbury Conservation Area Appraisal and Management Strategy was issued in 2011 and describes the history, character and appearance of the conservation area.

Assessment

- 10.20 The following analysis should be read alongside the Townscape, Visual Impact and Heritage Assessment ('TVIHA'), prepared by Peter Stewart Consultancy.
- 10.21 The proposals fall within the Bloomsbury Conservation Area. The Site is not statutorily listed, but consideration has been given to the surrounding listed buildings and the impact this proposal may have.
- 10.22 The TVIHA concludes that the proposed development would have no harmful effect on the Bloomsbury Conservation Area or on the setting of any heritage asset in the surrounding area.
- 10.23 Furthermore, the existing building on the Site is not considered to contribute positively to the character and appearance of the conservation area. However, the introduction of a new building of this proposed design is considered to enhance the character and appearance of the Bloomsbury Conservation Area and the settings of the nearby heritage assets and therefore is a benefit to the local area.

Townscape/Views

- 10.24 A TVIHA prepared by Peter Stewart Consultancy is submitted as part of this Planning Application.
- 10.25 Local Plan Policy D1 sets out that the Council require developments to, inter alia, preserve strategic and local views, respects local context and character, and integrates well with the surrounding streets and open space.

Assessment

- 10.26 A study was undertaken to establish the viewpoint locations from which 'before and after' views are provided. These viewpoints were agreed with LBC Officers.

10.27 Eleven (11) viewpoint positions were chosen to illustrate the visual effects of the proposed development in the local townscape and environment. The views have been prepared by Miller Hare and are described in detail in the TVIHA.

10.28 The TVIHA describes and assesses the likely significant effects on built heritage, townscape and views that would arise from the Proposed Development. In terms of built heritage, the Assessment considers listed buildings and conservation areas within the vicinity of the Site.

The verified views are as follows, and each are assessed in detail in the TVIHA:

- i. View 1: Gray's Inn Road / St Chad's Place;
- ii. View 2: Argyle Street / Argyle Square;
- iii. View 3: Cromer Street;
- iv. View 4: Gray's Inn Road / Ampton Street;
- v. View 5: Acton Street;
- vi. View 6: Swinton Street – East;
- vii. View 7: Swinton Street – West;
- viii. View 8: Gray's Inn Road;
- ix. View 9: Gray's Inn Road – opposite Action Street;
- x. View 10: Swinton Place; and
- xi. View 11: Argyle Street

10.29 In summary, it is considered that due to the built-up nature of the area, views of the proposed development would be limited to the streets around the Site. The scale of the development, and nature of the urban form in the area, limit the effect of the proposal on wider views. When seen in local views, the proposal would be of a comparable scale to other buildings along Gray's Inn Road and would be viewed alongside buildings of varying age, scales and styles. Therefore, it is concluded that the proposal would have no harmful effects on any views from the local area.

10.30 Through good quality design and the proposed relationship with its surroundings, the proposed development is considered to have a positive effect and would enhance the quality of the townscape of the area.

10.31 Therefore, the proposed development fully accords with Local Plan Policy D1.

11 Energy and Sustainability

- 11.1 The NPPF sets out the Government's overarching planning policies regarding the delivery of sustainable development through the planning system. Chapter 14 of the document identifies the role that planning plays in helping shape places to secure radical reductions in greenhouse emissions, minimising vulnerability and providing resilience to the impacts of climate change and supporting the delivery of renewable and low carbon energy and associated infrastructure.
- 11.2 At a national level 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.
- 11.3 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.
- 11.4 In accordance with National level objectives, the London Plan sets out the Mayor's vision to ensure that London becomes a world leader in improving the environment locally and globally, taking the lead in tackling climate change, reducing pollution, developing a low carbon economy, consuming fewer resources and using them more effectively.
- 11.5 Policy 5.2 requires new development 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.
- 11.6 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.
- 11.7 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.

11.8 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.

11.9 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.

11.10 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; and
- Maximise potential for natural ventilation.

11.11 Intend to Publish Draft London Policy SI2 relates to minimising greenhouse gas emissions and states that major development should be net-zero carbon which means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the energy hierarchy as set out:

- **be lean: use less energy and manage demand during operation**
- **be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly**

- **be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site**
 - **be seen: monitor, verify and report on energy performance**
- 11.12 Part C of the above policy states the requirement for a minimum on-site reduction of 35% beyond building regulations for major developments and that major commercial developments should achieve 15% through energy efficiency measures. Any shortfall should either be provided by a payment in lieu or off-site. Part F of the policy states the requirement for referable development to calculate the whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment.
- 11.13 Intend to Publish Draft London Plan Policy S14 states development proposals should minimise adverse impacts on the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure.
- 11.14 Intend to Publish Draft London Plan Policy S17 related to reducing waste and supporting the circular economy. Policy states that referable applications should promote circular economy outcomes and aim to be net-zero waste. A Circular Economy Statement is required to be submitted to demonstrate:
- How all materials arising from demolition and remediation works will be re-used and/or recycled
 - How the proposals design and construction will reduce material demands and enable building materials, components and products to be disassembled and re-used at the end of their useful life
 - Opportunities for managing as much waste as possible on site
 - Adequate and easily accessible storage space and collection systems to support recycling and re-use
 - How much waste the proposal is expected to generate and how and where the waste will be managed in accordance with the waste hierarchy
 - How performance will be monitored and reported
- 11.15 At a local level, through Local Plan Policy CC1 Camden requires all development to minimise the effects of climate change and encourages developments to meet the highest feasible environmental standards that are financially viable during

construction and occupation. Moreover, all development is required to reduce carbon dioxide emissions in line with the targets set out within the London Plan.

- 11.16 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.
- 11.17 Local Plan Policy CC2 requires all development to be resilient to climate change through the adoption of appropriate climate change adaptation measures.
- 11.18 Local Plan Policy CC2 also promotes the incorporation of sustainable design and construction measures within developments.
- 11.19 In March 2019 LBC updated the Camden Planning Guidance 'Energy Efficiency and Adaptation' to ensure that the Council's commitment to reducing carbon emissions is achieved. Moreover, Camden Planning Guidance 'Sustainability' (July 2015, updated March 2018) gives further guidance with respect to the principles of sustainability.

Assessment

- 11.20 In terms of energy performance, the energy report sets out the improvements in carbon reduction against both the current building regulation SAP 2012 carbon factors and the consulted SAP 10 carbon factors as stated in the GLAs draft Energy Assessment Guidance (April 2020). The Energy and Sustainability Statement, prepared by Atelier Ten, submitted with the application assesses how the new building accords with policies and principles of sustainable development and energy efficiency.
- 11.21 Developments are required to make the fullest contribution to tackling climate change by minimising carbon dioxide emission (Be Lean). The carbon emissions performance of the development was tested using dynamic energy modelling for non-domestic uses and SAP modelling for domestic use. In the case of the proposed dwellings, a representative sample were modelled to represent all energy types. Carbon emission and cash-in-lieu contributions have been calculated with the GLA's Carbon Emissions Reporting spreadsheet (for the SAP 10 carbon emissions factor).

11.22 For domestic and non-domestic, an 10% emissions reduction is achieved (compared to a PartL2A 2013 compliant development) through passive and energy efficiency measures alone.

11.23 The Be Lean strategies for the new build include the following:

- Low energy lighting/high efficiency light fixtures;
- Installation of mechanical ventilation units (MVHR);
- VRF units installed at roof level; and
- Appropriate glazing to passively control overheating

11.24 Developments are also required to adopt sustainable design and construction measures and prioritising decentralised energy (Be Clean).

11.25 In terms of Be Clean measures, there are no existing or planned heat networks serving the Site's location. Consideration has been given to the installation of a CHP system, however such system is considered unviable and also no longer considered future-proof. Space allowances and capped-off connection would be included for future connection to a district heating and/or cooling network should a network become available near the project Site.

11.26 Developments are also required to adopt renewables (Be Green). The Be Green results reduce carbon dioxide emissions by 43% for domestic and non-domestic. This would exceed the minimum 35% on-site carbon emission reduction required by the GLA.

11.27 The following (Be Green) renewable technologies have been considered appropriate for the proposal:

- VRF Heat Pump located at roof level; and
- Photovoltaic System (PV Panels);

11.28 Lastly, as set out in the Intend to Publish Draft London Plan, developments should now take into account how energy performances would be monitored and optimise if possible (Be Seen). The electricity and water supply to the building, including the output from the photovoltaic system will be fully metered. Sub-meters will also be

installed to measure electricity, heating and energy use as part of the proposed building's energy and power monitoring system. This will be configured to provide energy consumption data to each user group/tenant within the building. It will also be linked to the building energy management system (BEMS), thus enabling data capture and storage for long term review and optimal operation.

Sustainability Measures

- 11.29 An assessment of the sustainability credentials of the Proposed Development is contained within the Energy and Sustainability Statement prepared by Atelier Ten, which has been submitted as part of the application.
- 11.30 Due to the large domestic portion of the development and non-domestic areas contributing to less than 500sqm of the overall development area, it is not a requirement for BREEAM targets to be following as part of the proposal.
- 11.31 A Whole Life Carbon approach has been considered as part of the development with reference in the Energy and Sustainability Statement. The whole building life cycle analysis has enabled the design team to identify potentially large embodied carbon impacts and aim to address them through measures which include using reinforcement steel with 90% recycled content, and the intention to achieve 20% recycled aggregate in concrete.
- 11.32 Under Local Plan Policy CC1, there is a requirement to demonstrate it is not possible to retain and improve the existing building. An evaluation has been undertaken as part of the Whole Life Carbon Assessment for the refurbishment of the existing building. The retention of the building would have involved major interventions to refurbish to a standard which would allow for the use of the building for at least another 60 years. It was therefore concluded that a new-build was the most viable option for the long-term sustainability of the building which would result in a significantly more efficient structure and better spatial quality apartments. Furthermore, parts of the existing basement structure will be retained to save approximately 60 tons of carbon.
- 11.33 The Proposed Development priorities passive energy efficiency and demand reduction measures and would be built to high levels of energy efficiency. The proposal would adopt a range of passive design measures, including:

- Optimised thermal envelope performance;

- Good distribution of glazing on facades;
- Attenuated openable panels to mitigate noise levels;
- Good levels of thermal mass in the residential component; and
- Balconies to assist with shading.

11.34 In terms of water usage, the proposal seeks to minimise water consumption through seeking to reduce demand, and accommodate water efficient, low-flow fixtures in accordance with LBC's guidance to meet residential guidance of 110 litres per person per day.

11.35 The Proposed Development is therefore considered to accord with the aspiration of the LBC policies, the relevant London Plan policies set out in Chapter 5, including in particular Policy 5.2, and the Intend to Publish Draft London Policies.

Circular Economy

11.36 Policy GG5(H) of the Intend to Publish Draft London Plan states that planning and development should recognise and promote the benefits of a transition to a low carbon economy to strengthen London's economic success.

11.37 To minimise the use of new materials, the following circular principles should be taken into account in line with figure 3.2 of the Intend to Publish Draft London Plan:

- building in layers - ensuring that different parts of the building are accessible and can be maintained and replaced where necessary;
- designing out waste - ensuring that waste reduction is planned in from project inception to completion, including consideration of standardised components, modular build and re-use of secondary products and materials;
- designing for longevity;
- designing for adaptability or flexibility;
- designing for disassembly; and
- using systems, elements or materials that can be re-used and recycled.

- 11.38 Draft London Plan Policy SI 7 encourages waste minimisation and waste prevention through the reuse of materials and fewer resources. Referable applications should promote circular economy outcomes and aim to be net zero waste.

- 11.39 The supporting Circular Economy Statement, prepared by Atelier Ten, sets out the outline strategy for implementing the Circular Economy Principles as identified within the GLA's Circular Economy Statement Guidance (Pre-Consultation; April 2020) and the supporting Design for a Circular Economy Primer (March 2020).

- 11.40 Implementation of the Circular Economy approach would be directly carried out through the form of prescriptive deliverables at the appropriate stages (e.g. Pre-demolition audit at Concept Stage), or indirectly, in the form of Circular Economy Workshops at each stage. Implementation of Circular Economy principles would be monitored based on the specification and tender information and verified based on the As Built information.

- 11.41 Based on the above, it is considered that the proposed development accords with draft Policies GG5 (H) and SI 7 of the Intend to Publish Draft London Plan.

Flooding, Drainage and SUDs

- 11.42 The NPPF identifies that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere.

- 11.43 Local Plans should also be supported by Strategic Flood Risk Assessments and develop policies to manage flood risk from all sources. Sequential tests should be used to steer development to areas with the lowest probability of flooding. Strategic Flood Risk Assessments will provide the basis for applying this test. If, following the application of the sequential test, it is not possible or consistent with wider sustainability objectives for development to be located in areas with a lower probability of flooding, the exception test should be applied if appropriate.

- 11.44 Chapter 14 of the National Planning Policy Framework recommends that SUDS should be utilised, where possible, within all new drainage schemes.

- 11.45 Policy 5.13 of the London Plan promotes the use of SUDS to reduce the contribution of climate change to flooding.
- 11.46 Policy CG6 of the London Plan seeks to help London become more efficient and resilient by ensuring that buildings are designed to reduce impacts from natural hazards like flooding.
- 11.47 Intend to Publish Draft London Plan Policy S12 states that development proposals should ensure that flood risk is minimised, mitigated and the residual risks are addressed. The proposed development should aim to achieve greenfield run-off rates by maximising the use of above ground Sustainable Urban Drainage Systems (SUDS) in line with policy SI 13 of the London Plan.
- 11.48 At a 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.
- 11.49 Camden Local Plan Policy CC3 seeks to ensure that development does not increase flood risk and reduces the risk of flooding where possible.
- 11.50 Camden Planning Guidance 'Water and Flooding' (2019) states that the Council expects all developments, whether new or existing buildings, to be designed to be water efficient by minimising water use and maximising the re-use of water.

Assessment

- 11.51 The Site is located in Flood Risk Zone 1, an area assessed as having a 1 in 1000 or less annual probability of river or sea flooding (< 0.1%).
- 11.52 The Flood Risk Assessment, prepared by AKT II and submitted as part of this application, concludes that the Site is at a low risk from flooding from all sources and would not increase flooding elsewhere.
- 11.53 In terms of sustainable drainage systems, proposed green roof and below ground attenuation tanks would ensure that surface water run-off rates do not increase over the existing conditions, and the discharge rate for all storm events up to and including

the 1 in 100 year event would not exceed 5l/s. The proposed discharge rate for the Site has been accepted by Thames Water.

- 11.54 It is therefore considered that the development is at low risk of flooding from all sources and meets the requirements of the NPPF, Policy 5.13 of the London Plan, Draft Policy CG6, S12 and SI13 of the Intend to Publish Draft London Plan and Policies CC2 and CC3 of the Local Plan.

12 Amenity

- 12.1 This Section of the Statement assesses the proposals against policy relating to the amenity of nearby existing residents in terms of air quality, noise and daylight and sunlight.

Air Quality

- 12.2 The NPPF states that development should not contribute to or be put at unacceptable risk of, or be adversely affected by unacceptable levels of pollution, including air pollution (paragraph 170e). Planning should seek to comply with national and local policies for controlling air pollution (paragraph 181).
- 12.3 Policy 7.14 of the London Plan states that development proposals should minimise increased exposure to existing poor air quality and make provision to address local problems of air quality; promote sustainable design and construction to reduce emissions from the demolition and construction of buildings; be at least 'air quality neutral' and, where reduction measures are required, these are made on site.
- 12.4 Intend to Publish Draft London Plan Policy SI 1 (B1) requires that development proposals should not:
- Lead to further deterioration of existing poor air quality;
 - Create any new areas that exceed air quality limits; and
 - Create unacceptable risk of high levels of exposure to poor air quality.
- 12.5 Policy SI 1 (B2) of the draft London Plan requires that development proposals are at least air quality neutral, should use design solutions to prevent or minimise increased exposure to existing air pollution and should reduce impact on air quality during demolition and construction phases. Large scale development proposals subject to an EIA should consider ways to maximise benefits to local air quality and identify measures to design features that will be put in place to reduce exposure to pollution.

- 12.6 At a local level, Local Plan Policy CC4 requires development to provide air quality assessments where the proposed scheme is likely to expose residents to high levels of air pollution.

- 12.7 Camden Air Quality Planning Guidance (2019) states that all of Camden is a designated Air Quality Management Area due to the high concentrations of nitrogen dioxide (NO₂) and particulate matter (PM₁₀). 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 sensitive receptors susceptible to poor air quality, such as housing.

- 12.8 Camden Planning Guidance 'Air Quality' states that the Council's overarching aim is for new development to be 'air quality neutral', not lead to further deterioration of existing poor air quality and, where possible, to improve local air quality ('air quality positive').

- 12.9 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.

- 12.10 The London Borough of Camden has, since 2000, been designated an Air Quality Management Area. The Camden Air Quality Action Plan 2019-2022 sets out a variety of priorities to help reduce key air pollutants in the Borough.

Assessment

- 12.11 A detailed Air Quality Assessment has been undertaken by Air Quality Consultants and has been submitted to support this Planning Application.

- 12.12 The assessment has taken consideration of the emissions from construction and operational traffic, and construction dust. A risk of dust emissions from earthworks, construction and trackout are considered low. As dust emissions from demolition works are considered medium risk, mitigation measures such as a Dust Management

Plan or Construction Environmental Management Plan are considered appropriate to minimise the environmental impacts of the construction works.

- 12.13 Operational Air Quality effects without mitigation are judged to be ‘not significant’ and future residents would experience acceptable air quality based on future air quality predictions. However, at the specific request of LBC, we have presented mitigation measures taking account of the worst-case scenario which would involve a ventilation system for all habitable rooms fronting Swinton Street and Gray’s Inn Road. Further details would be provided as part of a ventilation strategy which could be requested via a suitably worded condition.
- 12.14 The Proposed Development is therefore considered to accord with Policy 7.14 of the London Plan, Draft Policy SI 1 of the Intend to Publish Draft London Plan, and Policy CC4 of the Local Plan.

Daylight / Sunlight

- 12.15 Paragraph 127 of the NPPF refers to securing a good standard of amenity for all existing and future occupants of land and buildings.
- 12.16 Policy 7.6 of the London Plan states that planning decisions in respect of buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate.
- 12.17 Intend to Publish Draft London Plan Policy D6(D) states that the design of developments should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.
- 12.18 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).

- 12.19 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.
- 12.20 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.

Assessment

- 12.21 A Daylight and Sunlight Report, prepared by eb7, has been submitted to support this Planning Application. This document provides a detailed assessment of the potential daylight and sunlight effects of the proposed development on neighbouring residential properties. In addition, an assessment has also been undertaken on the proposed residential units and the provision of sunlight to the proposed amenity areas.
- 12.22 When assessing VSC, NSL, and APSH, the Daylight and Sunlight Report sets out that alterations to daylight and sunlight are inevitable when undertaking meaningful development, especially in an urban area. With regards to neighbouring properties, the assessment of sunlight to neighbouring windows has shown full compliance with the BRE criteria. Furthermore, except for minor and isolated reductions to one individual neighbouring property, the amount of daylight received within each of the neighbouring habitable rooms would be in line with what would be expected in an urban area.
- 12.23 In terms of the proposed residential units, the vast majority of rooms receive good levels of daylight in excess of the relevant BRE targets. The ADF results show 91% of the rooms meet the daylight criteria, and the sunlight assessment shows that 47% have a main living room that achieves the recommended levels.
- 12.24 The lower levels of daylight and sunlight demonstrated for the proposed residential units relate to the requirement for private amenity space to be provided for residents in the form of balconies of which the relevant residential windows are located below. In this instance, the benefit of the provision of balconies for the occupants needs to be taken into account when considering offsetting any potential reduced level of

daylight. To assist in mitigating the reduction in daylight levels, living areas have been located to ensure that daylight levels are maximised.

- 12.25 The proposed shared amenity spaces have shown, in terms of sunlight (overshadowing), that 99% of the spaces would receive more than two hours of sunlight on 21st March and thereby exceed the BRE targets.
- 12.26 Taking account of the existing urban environment, the proposed scheme has an appropriate impact on the surrounding buildings, Furthermore, the requirement for the inclusion of private amenity space to benefit the future residents is considered to outweigh the slight reduction in daylight levels in the proposed residential units. Therefore, the proposed scheme is considered to accord with the daylight/sunlight requirements set out in the NPPF, London Plan, and Local Plan Policies.

Noise

- 12.27 The NPPF contains guidance on noise management in planning decisions. Paragraph 180 states that decisions should aim to avoid noise giving rise to significant impacts on quality of life as a result of development and mitigate noise impacts. This paragraph contains recognition that development will 'often create some noise'.
- 12.28 Policy 7.15 of the London Plan, 'Reducing Noise and Enhancing Soundscapes' aims to support the Mayor's Ambient Noise Strategy. The reduction of noise resulting from developments, and screening of them from major noise sources, is sought under this policy.
- 12.29 Intend to Publish Draft London Plan Policy D14 states that development proposals should manage noise by:
- avoiding significant adverse noise impacts on health and life;
 - reflecting Agent of Change principle;
 - mitigating and minimising the existing and potential adverse impacts of noise without placing unreasonable restrictions on existing noise-generating uses;

- improving and enhancing the acoustic environment and promoting appropriate soundscapes; and
- promoting new technologies and improved practices to reduce noise at source.

12.30 At a local level, Camden Local Plan Policy A4 seeks to ensure that noise and vibration from development is controlled and managed. Planning permission will only be granted for noise generating development where it can be operated without causing harm to amenity. Camden also seeks to minimise the impact on local amenity from deliveries and from the demolition and construction phases of development through this policy.

12.31 Camden's Amenity CPG (2018) supports Local Plan Policy A4, setting out when planning applications must be supported by noise reports and what mitigation measures can be implemented to prevent harm to amenity being caused.

Assessment

12.32 An Acoustic Report, prepared by Sandy Brown Associates, has been submitted to support the Planning Application.

12.33 This report sets out that an environmental noise survey was carried out on the Site to determine the daytime and night-time background sound levels. These results, and the guidance requirements set out by Camden Council, have been taken into account when assessing the proposed development.

12.34 The report sets out that any plant equipment must be designed such that the cumulative noise level at 1m from the worst affected windows of the nearby noise sensitive premises does not exceed:

- LAeq 47 dB during the daytime, and LAeq 43 dB during the night-time along Swinton Street.
- LAeq 45 dB during the daytime, and LAeq 41 dB during the night-time along Grays Inn Road.

- 12.35 Guidance has also been provided to reduce noise impact on future residents. Recommendations include high-performance double glazing, and the installation of mechanical ventilation systems with acoustically attenuated vents.
- 12.36 In terms of construction noise, a Construction Management Plan prepared by Real PM, has been submitted which sets out measures in order to mitigate construction noise which include the development of a Code of Construction Practice for the Site and the use of various measures where appropriate.
- 12.37 Consideration has been given to the noise impacts from the proposed development and also background noise impact on future residents, with appropriate mitigation measures incorporated into the proposal. Therefore, the proposal accords with the NPPF, Policy 7.15 of the London Plan, Draft Policy D14 of the Intend to Publish New London Plan and Policy A4 of the Local Plan.

13 Transport and Servicing

13.1 Chapter 9 of the NPPF sets out the Government's policies with regards to Transport. The overall aims are to promote solutions that support a reduction in greenhouse gas emissions and reduce congestion and will contribute to wider sustainability and health objectives. The NPPF outlines aims for a transport system balanced in favour of sustainable transport modes, in order to give people a real choice about how they travel. It also encourages solutions which support reductions in greenhouse gas emissions and reduce congestion. Paragraph 108 of the NPPF states it should be ensured that:

- appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;
- safe and suitable access to the site can be achieved for all users;
- any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

13.2 Paragraph 110 of NPPF confirms applications for developments should:

- a) “give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;
- b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
- c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;
- d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and

- a) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.”

13.3 London Plan Policy 6.1 ‘Strategic Approach’ examines the integration of transport and development and as such:

- Encourages patterns and forms of development that reduce the need to travel especially by car;
- Seeks to improve public transport capacity and accessibility where it is needed, for areas of greatest demand and areas designated for development and regeneration, including the CAZ and Opportunity Areas;
- Supports, in general, high trip generating development only at locations with both high levels of public transport accessibility and capacity, sufficient to meet the transport requirements of the development. Parking provision should reflect levels of public transport accessibility;
- Supports measures that encourage shifts to more sustainable modes and appropriate demand management; and
- Promotes walking by ensuring an improved urban realm.

13.4 London Plan Policy 6.3 states that **“development proposals should ensure that impacts on transport capacity and the transport network, at both a corridor and local level, are fully assessed”**. The policy also indicates that **“transport assessments will be required in accordance with TfL’s Transport Assessment Best Practice Guidelines for major planning applications. Workplace and/or Residential Travel Plans should be provided for planning applications exceeding the threshold in, and produced in accordance with, the relevant TfL guidance. Construction logistics plans and delivery and servicing plans should be secured in line with the London Freight Plan and should be co-ordinated with travel plans”**.

13.5 Policy 6.9 states that **“the Mayor will work with all relevant partners to bring about a significant increase in cycling in London”**.

13.6 London Plan 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 and street environment.

- 13.7 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.
- 13.8 Intend to Publish Draft London Plan Policy T2 requires that development proposals should demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance, reduce the dominance of vehicles on London's streets, and be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport. Whilst Intend to Publish Draft London Plan Policy T4 advises that transport assessments/statements should be submitted with development proposals, which focus on embedding the Healthy Streets approach within the development.
- 13.9 At a 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.
- 13.10 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.
- 13.11 Policy T1 (h) 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 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.
- 13.13 To assess the overall implications of developments, LBC under policy T4 expects the submission of a Transport Assessment, Delivery and Servicing Management Plan and Construction Management Plan where the implications of proposals are significant.

- 13.14 On 15 March 2019 Camden adopted the 'Transport' CPG which provides information on all types of detailed transport issues within the borough including assessing transport impact, travel plans, delivery and servicing plans and cycling facilities.
- 13.15 A Transport Statement, prepared by TTP Consulting, has been submitted in support of this Planning Application.
- 13.16 The Transport Strategy for the Acorn House scheme has sought to fully embrace the Camden Council and GLA aspirations for Healthy Streets, encouraging pedestrian movements but also ensuring that the scheme provides for sufficient cycle parking and can be successfully serviced through a design rather than management solution.

Car Parking

- 13.17 In respect of car parking provision, Policy 6.13 of the London Plan, states that the Mayor, in conjunction with the London boroughs, will seek to ensure that an appropriate balance is struck between promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use. It also dictates that the maximum standards for parking as set out in the Plan should be applied to planning applications.
- 13.18 Intend to Publish Draft London plan policy T6 states that car-free development should be the starting point for all development proposals in places that are well connected by public transport.
- 13.19 The Site's highly accessible location, within walking distance of major overground/underground stations and bus routes in close proximity, is reflected in its PTAL rating of 6b, which is the highest possible rating.
- 13.20 The proposal is car-free in line with the ambitions of the London Plan Policy 6.13 and Intend to Publish Draft London Plan Policy T6 which aim to see an appropriate balance between promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use.

Cycle Parking

13.21 Policy 6.9 of the London Plan states that “the Mayor will work with all relevant partners to bring about a significant increase in cycling in London”.

13.22 London Plan Policy 6.13 also sets out that cycle parking should be provided in accordance with the minimum cycle parking standards set out in table 6.3. Table 6.3 sets out the following requirements (GEA):

- Offices (Class B1) - 1 space per 90 sqm long stay and for short stay, for the first 5,000sqm, 1 space per 500 sqm and thereafter 1 space per 5,000sqm
- Retail (Class A1 Non-food Retail) - 1 space per 250sqm for first 1000sqm, 1 space per 1000sqm thereafter long stay and for short stay, 1 space per 125 sqm for first 100sqm, 1 space per 1000sqm thereafter.
- Residential (Class C3) - 1 space per studio and 1-bedroom unit, 2 space for all other dwellings for long stay, and 1 space per 40 units for short stay.

13.23 Intend to Publish Draft London Plan Policy T5 (B) states that cycle parking should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards. Development proposals should demonstrate how cycle parking facilities will cater for larger cycles, including adapted cycles for disabled people.

13.24 Table 10.2 of the Intend to Publish Draft London Plan outlines the minimum cycle parking requirements for each Use Class as follows (GEA):

- Offices (Class B1) - 1 space per 75 sqm long stay and for short stay, for the first 5,000sqm, 1 space per 500 sqm and thereafter 1 space per 5,000sqm
- Retail (Class A1 Non-Food Retail) - 1 space per 250 sqm for first 1000 sqm and 1 space per 1000sqm thereafter for long stay and for short stay, 1 space per 60 sqm for the first 1000sqm and thereafter 1 space per 500 sqm
- Residential (Class C3) - 1 space per studio or 1 person 1-bedroom dwelling, 1.5 spaces per 2-person 1-bedroom dwelling, 2 spaces per all other dwellings for long stay, and 2 spaces for long stay if 5 to dwellings proposed.

Table 13.1 – Proposed Cycle Space

Land Use	Long Stay Cycle Provision
Offices (B1)	9
Retail (A1)	2
Residential (C3)	66
Total	77

- 13.25 The proposed cycle parking would be located in two areas of the building. The residential cycle parking would be located at the ground floor level of the building and accessed from the residential entrance lobby. A total of 66 spaces would be provided for residential uses, of which two would be wider bays for parking cargo bikes or tricycles. This exceeds the requirement of the Intend to Publish Draft New London Plan standards.
- 13.26 The commercial cycle parking area would be provided at the basement level of the building with lift access provided in accordance with guidance provided by Transport for London's Cycling Design Standards. A total provision of 11 cycle spaces would be provided at basement level, 9 for the office uses and 2 for the retail use.
- 13.27 The proposed footprint of the building would not be able to accommodate the provision of visitor/customer cycle parking within the Site boundary. Therefore, the short stay cycle parking is proposed to be provided on the footway of Gray's Inn Road similar to the existing on-street cycle parking on Swinton Street.
- 13.28 The proposed scheme exceeds the Intend to Publish Draft New London Plan standards and is therefore acceptable.

Deliveries and Servicing

- 13.29 Based on the scale of the proposed development, deliveries would be modest in nature and typically be undertaken by cycle, motorcycle or light van. As such, and to also maximise the

quantity of affordable housing and workspace on Site, no on-site servicing area is proposed, and the development would utilise existing on-street loading facilities on Swinton Street. There are two on-street loading bays at the western end of Swinton Street, both of which are less than 10m away from the Site.

Waste and Recycling

- 13.30 Camden's Local Plan Policy CC5 sets out that the Borough will seek to make sure that developments include facilities for the storage and collection of waste and recycling.
- 13.31 A Waste Management Strategy, prepared by Waterman, has been submitted as part of the Planning Application. This document sets out the proposed waste storage options for the different uses within the proposed scheme.
- 13.32 A communal storeroom for waste would be located on the ground floor and would provide separate bulk bins and wheelie bins for the residential, commercial and retail uses. The storeroom would be overseen by a caretaker service who would manage the Site to ensure there is always adequate bin capacity.
- 13.33 LBC refuse collection operatives would have direct access to the storeroom to collect the bins which would be returned once emptied. To allow for easier collection of bulky waste and bin servicing, a concertina door would be installed that can be opened onto the street.
- 13.34 All the proposed transport and servicing matters set out fully accord with the relevant national, regional and local planning policies.

14 Other Considerations

Basements

14.1 Camden Local Plan Policy A5 states that the Council will only permit basement development where it is demonstrated to its satisfaction that the proposal would not cause harm to:

- a) a. neighbouring properties;
- b) the structural, ground, or water conditions of the area;
- c) the character and amenity of the area;
- d) the architectural character of the building; and
- e) the significance of heritage assets.

14.2 Camden Basements CPG gives detailed guidance with respect to new basement development, specifically their siting, location, scale and design.

Assessment

14.3 A Basement Impact Assessment, prepared by AKT II, has been submitted to support this application.

14.4 The Basement Impact Assessment has assessed the proposed development and concluded the following:

- There would not be a risk or stability impact to the development and/or adjacent sites due to slopes;
- There is a very low risk of groundwater flooding and therefore mitigation measures are not deemed necessary to the proposed development or surrounding infrastructure;
- There is no impact to the wider hydrogeological environment and no mitigation measures are therefore proposed;
- No new impact on the basements of the neighbouring structures are affected during construction; and

- There are no significant impacts expected to the surrounding infrastructure.
- 14.5 Overall, the proposed basement works are considered to accord with Local Plan Policy A5.

Archaeology

- 14.6 Camden Local Plan Policy D2 states that the Council will protect remains of archaeological importance by ensuring acceptable measures are taken proportionate to the significance of the heritage asset to preserve them and their setting, including physical preservation, where appropriate.

Assessment

- 14.7 A supporting Archaeological Desk-based Assessment, prepared by MOLA, has been submitted as part of the Planning Application.
- 14.8 The assessment sets out that the Site does not fall within an Archaeology Priority Area.
- 14.9 Furthermore, Archaeological survival potential across the site is likely to be nil for remains dating from the Roman to later medieval periods, and low for remains dating to the prehistoric and post-medieval period reflecting the presence of a basement covering the full extent of the site.
- 14.10 As the site is not located within an APA and no archaeological remains are considered to fall within its footprint it is considered that further investigation would not be required.
- 14.11 However, should archaeological work be considered necessary, an appropriate investigation strategy can be agreed via a suitably worded condition.
- 14.12 The scheme is not considered to have an adverse impact on remains of archaeological importance and therefore complies with Local Plan Policy D2.

Land Contamination

- 14.13 Policy A1 of the Camden Local Plan stipulates that the Council will seek to protect the quality of life of occupiers and neighbours. The factors the Council will consider include [inter alia] contaminated land.

Assessment

- 14.14 A Contaminated Land Assessment, prepared by Soiltechnics, has been submitted to support the proposal.
- 14.15 The site history demonstrated in the report shows that the Site has been used for either residential or education purposes from 1973 and no contaminant uses were known to have been located onsite.
- 14.16 In terms of contamination risk, the Site and immediately adjacent properties have no recorded trading activities likely to result in a source of contamination on or close to the Site. In addition, there is no record of any substation pollution incidents within 500m of the Site.
- 14.17 Furthermore, observations were undertaken which did not show any obvious evidence of any current or recent activities on site or adjacent sites likely to result in a potential source of chemical contamination.
- 14.18 Furthermore, the proposed use of the Site for residential, commercial, and retail uses is similar to the existing uses within close proximity to the Site and is not considered to propose adverse impacts in terms of contaminants for neighbouring occupiers.
- 14.19 Therefore, the proposed development accords with Local Plan Policy A1.

Trees

- 14.20 Camden Local Plan Policy A3 sets out the Council will resist the loss of trees, require trees which are to be retained to be satisfactorily protected during demolition and construction works, and expect development to incorporate additional trees and vegetation wherever possible.

- 14.21 An Arboricultural Impact Assessment and Arboricultural Method Statement, prepared by PJC Consultancy, has been submitted to support this Planning Application.
- 14.22 No trees would require removal in order to facilitate the demolition and construction of the proposed development.
- 14.23 Furthermore, taking account of neighbouring trees and based on the current design, the AIA confirms that no significant demolition/construction activities are proposed within the root protection area of retained trees in the surrounding area. Appropriate tree protection methodologies have been provided, which when followed would not adversely affect the trees retained during demolition and construction works.
- 14.24 The proposed development has also sought to increase the provision of vegetation on the Site with the inclusion of planting on the 9th floor and lower ground floor in the amenity areas, and on the 1st floor roof which proposes biodiverse planting.
- 14.25 Therefore, the proposal accords with Local Plan Policy A3.

15 Planning Obligations and Community Infrastructure Levy

- 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, among other things.
- 15.2 In accordance with Regulation 122 of the Community Infrastructure Levy Regulations 2010, as amended, and paragraph 204 of the NPPF, a planning obligation should only be sought where they meet all of the following tests:
- a) Necessary to make the proposed development acceptable in planning terms;
 - b) Directly related to the proposed development; and
 - c) Fairly and reasonably related in scale and kind to the proposed development.
- 15.3 Paragraph 54 of the NPPF states that planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.
- 15.4 Under paragraph 55 of the NPPF, planning obligations should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects. It goes on to state that agreeing conditions is beneficial to all parties involved in the process and can speed up decision making. Conditions that are required to be discharged before development commences should be avoided, unless there is clear justification.
- 15.5 Under Policy 8.2 of the LP 'Planning Obligations', boroughs should include appropriate strategic as well as local needs in their policies for planning obligations. Policy 8.2 states that negotiations should seek a contribution towards the full cost of all such provision that is fairly and reasonably related in scale and kind to the proposed development and its impact on a wider area.

- 15.6 The use of planning obligations is specifically required through Local Plan policy DM1 'delivering and monitoring' although a whole range of individual development policies may be used to justify an obligation.
- 15.7 Local Plan Policy DM1 states that the Council will use planning obligations, and other suitable mechanisms, where appropriate, to; support sustainable development; secure any necessary and related infrastructure, facilities and services to meet the needs generated by development; and mitigate the impact of development.
- 15.8 The Applicant would enter into a legal agreement with the Council to secure the reasonable and necessary planning obligations associated with the Proposed Development. Furthermore, the S106 Agreement would seek to link both the Acorn House and Belgrove House proposals.

Community Infrastructure Levy (CIL)

- 15.9 Since 2012, all developments in London which result in the addition of over 100sqm GIA floorspace (with some exceptions including affordable housing) have been eligible to pay Mayoral CIL. In February 2019 the Mayor adopted a new charging schedule (MCIL2). MCIL2 came into effect on 1 April 2019 and supersedes MCIL1 and the associated Crossrail Funding SPG. The relevant MCIL2 rates are as follows:
- Office - £185 per sqm (Central London);
 - Retail - £165 per sqm (Central London); and
 - All other Development - £80 per sqm (Band 1 – Camden).
- 15.10 Camden CIL came into effect on 1 April 2015. The CIL tariff for sites located within Central Camden (i.e. Zone A) are charged at the following rates:
- Office - £45 per sqm;
 - Retail - £25 per sqm
 - Residential (10 or more dwellings) - £150 per sqm; and
 - Other commercial uses - £25 per sqm.
- 15.11 Camden submitted its revisions to the CIL Charging Schedule, on 19 February 2020. The Council held a virtual Examination Hearing on Wednesday 27 May 2020. On 26 June 2020, the Examiners report was published recommending that the Charging Schedule is approved.

If the charging schedule is adopted and comes into force prior to grant of the planning permission these will become the relevant charging rates.

15.12 The draft CIL Charging Schedule (2020) within Zone A sets out the following rates:

- Office - £110 per sqm;
- Retail - £32 per sqm;
- Residential (10 or more dwellings) - £193 per sqm; and
- Other commercial uses - £32 per sqm.

Developer Contributions

15.13 The CPG sets out how the Council will use Section 106 Contributions and CIL to fund infrastructure in the Borough. It states that financial contributions will be sought in respect of affordable housing, open space, infrastructure to address the site specific and related impacts of development which may include financial, and non-financial contributions. Detailed guidance for calculating specific financial obligations is set out within the relevant CPGs.

Draft Heads of Terms

15.14 The two permissions at Belgrove House and Acorn House would be linked by a Section 106 Agreement. At this stage it is anticipated that the following S106 contributions and obligations could include:

- The provision of off-site affordable workspace, with Acorn House being the preferred location
- Agreement and implementation of an Employment and Training Strategy
- Package of end-use employment and training obligations
- Employment and training contribution
- Affordable housing secured off site, with Acorn House being the preferred location
- Affordable housing payment in lieu to make the total affordable housing offer comply with policy when aggregated with the off-site provision
- Obligations to facilitate the provision of open space improvements
- Landscape Management Plan
- Car-free restriction (residential and commercial)
- Construction Management Plan (CMP)
- CMP monitoring fee

- Pedestrian, Cycle and Environment contribution
- Obligations to facilitate Highways improvements
- Strategic Level Travel Plan for office/lab use
- Strategic Level Travel Plan review fee
- Local Level Travel Plan for retail use
- Local Level Travel Plan review fee
- Delivery and Servicing Management Plan
- Agreement and implementation of a Sustainability plan
- Carbon offset contribution
- Agreement and implementation of an Energy plan
- Agreement and implementation of a Basement Construction Plan

16 Summary and Conclusions

- 16.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires proposals to be determined in accordance with the statutory development plan unless material considerations indicate otherwise. This Planning Statement has assessed the Proposed Development against the development plan and other relevant planning policy and guidance at national, regional and local policy level.
- 16.2 The proposed development has been subject to thorough pre-application discussions with local residents, businesses, Camden Officers and other interested third parties. The applicant has sought at all times to consider and where possible incorporate responses received.
- 1.16 The Proposed Development has been designed by AHMM Architects, to a very high standard and would incorporate high quality materials. The proposal comprises the demolition and redevelopment of Acorn House to provide a new mixed-use scheme comprising 33no. 100% affordable units, affordable office workspace, retail use, private amenity space and associated landscaping works. The proposal facilitates the delivery of offices and lab space at Belgrove House by allowing the required affordable housing provision to be located off-site.
- 1.17 This application is linked to a planning application submitted in respect of Belgrove House, a 4 minute walk from the site. Acorn House is proposed to house affordable workspace and part of the affordable housing requirement that is generated by the net additional commercial floorspace across Belgrove House and Acorn House sites. A policy compliant payment in lieu of the remaining residential requirement would be secured by legal agreement attached to the planning permission.
- 16.3 The proposal demonstrates that it satisfies statute and meets the requirements of planning policies at national, regional and local levels and in addition meets the aims of emerging policy aspirations.
- 16.4 The application accords with national, regional and local policy objectives to deliver sustainable, mixed-use and balanced communities and should therefore be granted planning permission.