

Address:	11- 12 Ingestre Road London NW5 1UX		1
Application Number(s):	2018/4449/P	Officer: Seonaid Carr	
Ward:	Kentish Town		
Date Received:	14/09/2018		
Proposal: Erection of a six storey building plus single storey basement to provide 50 Assisted Living residential units (1 x 1 bed, 41 x 2 bed, 8 x 3 bed), following demolition of the existing building together with associated communal facilities, plant equipment, landscaping and 8 car parking spaces.			
Background Papers, Supporting Documents and Drawing Numbers:			
<p>Existing: 27463-A-E11-01 rev D, 27463-A-E11-02, 27463-A-E11-03, 27463-A-E11-04, 27463-A-E11-05 and 27463-A-E13-01.</p> <p>Demolition: 27463-A-D11-01, 27463-A-D11-02, 27463-A-D11-03, 27463-A-D11-04 and 27463-A-D13-01.</p> <p>Proposed: 27463-A-P11-00 Rev F, 27463-A-P11-01 Rev F, 27463-A-P11-02 Rev D, 27463-A-P11-03 Rev D, 27463-A-P11-04 Rev C, 27463-A-P11-05 Rev C, 27463-A-P11-06 Rev C, 27463-A-P11-07 Rev C, 27463-A-P11-10 Rev C, 27463-A-P11-11 Rev B, 27463-A-P11-20 Rev B, 27463-A-P12-01 Rev B, 27463-A-P12-02 Rev D, 27463-A-P13-01 Rev D, 27463-A-P13-02 Rev D, 27463-A-P13-03 Rev C, 27463-A-P13-04 Rev D, RG-L-04-1 Rev A, RG-L-04-2 Rev A, RG-L-04-3 Rev A, RG-L-05-1, RG-L-05-2, P0097 EX(60) 001 Rev P, P0097 ME(60) 002 Rev P</p> <p>Documents: Planning Statement by Barton Willmore dated 10/09/18, Access Note dated 06/02/19, Financial Viability Assessment by DS2 dated September 2018, Noise and Vibration Assessment Rev D by Create Consulting Engineers dated 05/09/18, Fire Safety Strategy by International Fire Consultants dated 20/06/18, Air Quality Assessment Rev D by Create Consulting Engineers dated June 2018, Draft Construction Management Plan by Create Consulting Engineers dated July 2018, Energy Strategy by Create Consulting Engineers Rev E dated 14/05/19, Basement Impact Assessment by Create Consulting Engineers, Travel Plan by Create Consulting Engineers dated July 2018, Transport Statement by Create Consulting Engineers Rev C dated September 2018, Design and Access Statement by Barton Willmore dated September 2018, Care Needs Assessment by Barton Willmore dated September 2018, Daylight and Sunlight Report by gia dated 16/08/18, Internal Daylight and Sunlight Assessment by gia dated 16/08/18, Statement of Community Involvement by Your Shout dated August 2018, Delivery and Servicing Management Plan by Create Consulting Engineers dated June 2018, Arboricultural Implications Report by SJA Trees dated August 2018, Preliminary Ecology Appraisal by the Ecology Partnership dated October 2017, SUDS Pro Forma by Create Consulting Engineers, Flood Risk Assessment and Drainage Strategy by Create Consulting Engineers dated July 2018, Assisted Living Project Design Report by McKee Associated dated September 2018 and External Lighting dated 28/08/18.</p>			
RECOMMENDATION SUMMARY: Grant conditional planning permission subject to Section 106 Legal Agreement			
Applicant:		Agent:	

Four Quarters (Ingestre Road) Limited C/O Agent	Barton Willmore The Observatory Southfleet Road Ebbsfleet Dartford Kent DA10 0DF
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ANALYSIS INFORMATION

Land Use Details:			
	Use Class	Use Description	Floorspace (GIA sqm)
Existing	<i>C2 Residential Institutions</i>		2021
	TOTAL		2021
Proposed	C3 Residential		7737.5
	D2 Gym (ancillary to care home)		216
	A1 Retail		131.5
	TOTAL		8085

Residential Use Details:					
	Residential Type	No. of Bedrooms per Unit			
		1	2	3	Total
Market	Flat	1	41	8	50
TOTAL - All	Flats & Houses	1	41	8	50

Parking Details:		
	Parking Spaces (General)	Parking Spaces (Disabled)
Existing	0	0
Proposed	0	8

OFFICERS' REPORT

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

1 Executive Summary

- 1.1 The application site is a former Council owned care home, within the middle of a Council estate on Ingestre Road. The site is not within a Conservation Area nor is the building on site considered to be locally listed. The site was sold to a private developer in 2013 and has been vacant for a number of years.
- 1.2 The existing building is a 'doughnut' shaped building of 2-3 storeys constructed brick. The proposal seeks to demolish the existing building and replace with a 'U' shaped building of 4-5 storeys with a 6th storey set back and basement. The development would provide 50 residential units for assisted living for over 55s.
- 1.3 For the purposes of assessing the application the proposed land use has been considered as C3, given the limited provision of care on site it is not considered to fall within the C2 Use Class. However the intended end users are a consideration in assessing the application given there are a number of communal areas for residents. With this in mind the redevelopment of the site for a residential use of this nature is welcomed given this is a priority land use within the Borough.
- 1.4 The development would include some areas which can be accessible to the general public for example there would be two commercial units to the ground floor on Ingestre Road, with access from Ingestre Road and the gym within the basement would be accessible to over 55s. It is considered these elements would assist in integrating the development with the surrounding community. The design of the scheme has been subject to many variations and what is the final proposal is considered the most appropriate in terms of scale to knit into the local topography and grain.
- 1.5 The development does not include affordable housing on site following a viability review. However, but officers have negotiated a financial contribution in lieu and a deferred reappraisal to ensure that the maximum contribution can be paid to the Council for affordable housing elsewhere.
- 1.6 With regard to the impact on surrounding residents in terms of their amenity, there are some losses to levels of light to neighbouring residents, however the majority of these are negligible and due to the existing design of the neighbouring buildings themselves with projecting wings already impacting on effected windows. In regard to the most affected building, Grangemill the applicant has undertaken a mirror massing study as well as the standard

assessment. The mirror massing study is in accordance with BRE methodology and has been accepted as alternative assessment by the Councils independent assessor and, on balance, the loss of daylight and sunlight is considered to be within an acceptable range.

- 1.7 Overall the design development has evolved significantly through negotiations with officers and the external DRP to a point now where the scheme is of a good quality and would enhance the character of the surrounding area both with the proposed building and the wider street improvements that surround the site. It also provides for needed residential accommodation for older people on the site of a former care home that is now surplus to requirements. The incorporation of this use within the existing area contributes to fostering a mixed and balanced community in line with corporate objective in the Camden Plan.

2 BACKGROUND

- 2.1 Until 2013 the building on the site was operated by the Council as a residential care home which falls within the C2 Use Class (Residential Institutions). In a Council Cabinet Report dated 19/02/2013, it was agreed to dispose of three Council owned care homes which were considered surplus and move their residents to two modern, fit-for-purpose care homes at Maitland Park and Wellesley Road. At Ingestre Road the residents were moved out in 2013 and moved to Maitland Park and the care home was closed. The site was then sold to a private developer.
- 2.2 Officers have been in discussions with the applicant on the development of the site for assisted living units since 2017.

3 SITE

- 3.1 The application site covers an area of approximately 0.23 hectares (2308sqm), not including the road as shown in the existing site plan below in Figure 1.

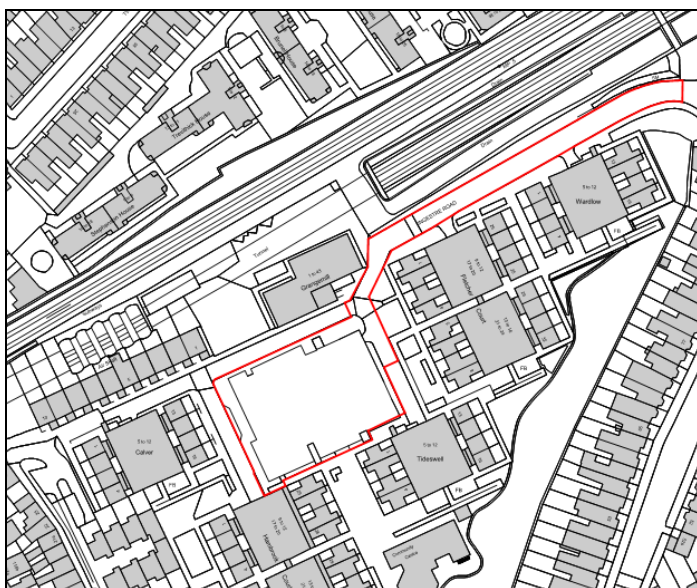


Figure 1 – The existing site

- 3.2 The application site is located within the Ingestre Road estate which was built 1967-71. The estate was designed by John Green for Camden Architects' department. It provides a highly distinctive context to the proposal site.
- 3.3 The site currently occupied by the now disused former elderly persons home, lies at the heart of the estate on the south side of Ingestre Road. Ingestre Road runs west to east through the north of the estate, parallel to the Overground railway cutting. It connects the estate with the surrounding area, linking to Highgate Road and Gospel Oak station via Little Green Street in the west and to Burghley Road in the east, which leads on to Tuffnell Park.
- 3.4 Ingestre Road is the only street, in the traditional sense, on the estate, because pedestrian and vehicular movement is mostly segregated along modernist urban design principles. To the north of the proposal site is an open space, terraced housing and the eight storey Grangemill block of flats that lies diagonally across Ingestre Road. To the south there is a less conventional residential building typology of interlocking terraced maisonette blocks that step up from west to east above a double height undercroft that provides car parking for the estate.
- 3.5 The application site lies between the ground level of Ingestre Road and the raised deck level to the south. In general terms, with the exception of the eight storey Grangemill building, the proposal site occupies a low-rise residential setting. The majority of homes are within 1 to 3 storey terraced buildings although some stand at 4/5 storeys in relative terms to the application site where they are located on the raised podium level. A community centre is also located to the south of the proposal site on the southern edge of the raised podium.
- 3.6 The existing building comprises four wings of two to three storeys arranged around a central courtyard. In common with the rest of the estate, it has a

broken, stepped massing, flat roofs and is faced in red brick with exposed structural concrete and elements of white timber spandrel panelling.

- 3.7 The southern face of the building is connected by a bridge to the podium level across a sunken garden courtyard space. The podium deck is reached via concrete steps immediately adjacent to the south western corner of the proposal site and by a steeply ramped access road on the eastern edge of the proposal site. Although there is step free access to the podium open space, the gradient of the access road is too steep to meet current accessibility standards.
- 3.8 In respect of site designations, the site is not within a Conservation Area. The Dartmouth Part Conservation Area bounds the estate in the north and west directions, some 50m and 80m from the application site respectively. There are no listed buildings on site or within the Ingestre Road Estate, the nearest listed building is 80m to the west of the site at Little Green Street.
- 3.9 With regard to public transport access, the site has a PTAL rating of 3 (good), which is the middle of the PTAL scale, however this doesn't take into account the pedestrian link between the site to Highgate Road via Little Green Street which improves access to public transport. The site is well served by buses on Highgate Road and Tufnell Park Station is located some 440m to the east of the site with access to the Underground.

4 THE PROPOSAL

- 4.1 Planning permission is sought for the erection of a six storey building with a single storey basement to provide 50 assisted living residential units; 1 x 1 bed, 41 x 2 bed and 8 x 3 bed. All units would be for the private market.
- 4.2 The proposed building would have a U shaped building form with 5 full storeys with a set back 6th floor. The U shape of the building would create an enclosed south facing courtyard which due to the topography of the site would be at first floor level, connecting to the public realm via a bridge walkway.
- 4.3 The development would be constructed with red brick as the main facing material, the set back upper floor would be faced in a complementary dark grey. The fenestration and balconies would be metal all in a dark grey.
- 4.4 The proposal would include a single storey basement measuring some 1,446sqm which would provide a resident gym with associated change facilities, 8 disabled car parking spaces, mobility scooter parking, cycle parking, plant rooms, laundry and refuse store. The only expression of the basement would be to the south west corner where there would be a small lightwell (0.8m by 7.4m) providing light to the gym area.
- 4.5 To the ground floor would be 4 residential units, 2 small commercial units fronting Ingestre Road which would be publically accessible, staff facilities, resident lounge with external terrace, cycle and scooter storage and a car lift

providing access to the basement car parking area. The remaining levels of the building would be residential units.

- 4.6 As part of the development the applicant is proposing to make some wider public realm improvements which include the provision of 8 street trees following the removal of 6 category C trees and shrubs beds. There would also be an improved access in the south west corner leading from Ingestre Road to the walkway that access the community centre. This access would be provided with ambulant steps which would be wider with increased lighting to provide a safe and useable route.

5 RELEVANT HISTORY

The site

- 5.1 There have been no relevant planning applications submitted for the application site. The scheme was presented at a DM Forum with local residents and a subsequent Developers Briefing, a summary of both are provided below. Please note the scheme presented was not the same as that currently proposed it was formed of 2 taller blocks rather than the proposed 'U' shaped building. The scheme was also presented to the DRP details of which are provided below.

Development Management Forum 22 November 2017

- 5.2 The Forum was attend by around 40 local residents and ward Councillor, Councillor Apak, a summary of the comments of the meeting are provided below:
- Concern 8 storeys will set a precedent for future development.
 - Consider it to be overdevelopment.
 - Concerns over construction management.
 - Development should have public housing provision and care units within it for older Camden residents.
 - Suspect units would be converted into private residential and sold.
 - Insufficient units to support the ground floor units.
 - Development wouldn't benefit the wider estate, the wider estate should be improved.
 - Residents raised concern about the public consultation that had taken place to date that it was not accurate.

Developer's Briefing – 28 November 2017

- 5.3 A subsequent Developers Briefing was held with Cllrs Beales, Johnson, Apak and Freeman, a summary of the comments is provided below:
- Affordable housing should be onsite, if not a donor site.
 - Questioned if there could be scope for a community centre in the development or areas that could be rented out to wider community.
 - Consideration of anti-social behaviour needs to underpin all aspects of the development.
 - Work needs to be done to engage the local community further.
 - Height, form, massing broadly acceptable.
 - Concern about amount of parking.

- CIL money should be spent locally on the estate.
- How do the proposals fit with the health and wellbeing aspect of the Local Plan.

5.4 The site was subject to pre-application discussions with officers and presented to the Camden Design Review Panel(DRP) three times. During the course of the pre-application discussions the design of the proposal was significantly changed to reflect comments received by officers and the Camden DRP, the comments of the DRP are summarised below referencing the initial proposal and the revised proposal which is akin to the submitted development.

5.5 Full Review – 6th October 2017

- The panel supports the broad strategy being pursued on a challenging site, but feels designers need to address some important issues to ensure the new buildings achieves its aims.
- The panel suggest several areas where the building could make a greater contribution to quality of place on the Ingestre Road estate:
 - Access from podium level from Ingestre Road should be more generous to create a potentially transformative connection between public spaces.
 - Layout of activities within the building should be reconsidered to ensure the creation of an active frontage and better use of daylight.
 - The microclimate of the new podium level public space will determine whether the new public space is well-used, and must be carefully designed to ensure it is comfortable.
- The panel feel in broad terms the volume of the development is appropriate, but suggests it should be distributed differently to knit better with the surrounding estate. If it fails to connect with its surroundings, its likely to reduce the quality of the place as a whole.
- The panel encourages the designers to continue developing their proposal so it can take full advantage of an important opportunity to improve the quality of the wider neighbourhood.
- The massing of blocks around the central space does not seem formally appropriate alongside the north-south alignment of the existing estate buildings. The current design needs to be subtly integrated with the surroundings.
- The proposed heights can be justified if the relationship with the surrounding estate is right. A key objectives for the new building should be to respond to and enrich the distinctive character of the estate.
- The inclusion of terraces at several levels makes the new blocks seem fragmented in comparison to the design language of the existing estate. The new building doesn't need to replicate the architecture of the estate but should sit comfortably in its distinctive context. The building could have fewer, larger spaces with less definition to create more sociability and connection between residents.
- The existing estate is united with red brick, its important the new building connects with the character of the dominant material. A different version could be used, but it should form part of the same material language.

- The principal of splitting the site on a north-south axis and creating a connection between Ingestre Road and the upper-level podium space is an important, positive move for the estate as a whole. However the proposed stairway seems too similar to the constricted stairs that currently provide podium access.
- At the current width the stairs will not be clearly visible from street level. The connection would be more effective if it was wider and more generous, allowing the podium to be seen from street-level and people drawn in.
- A ramp should be considered instead of stairs to provide a smoother transition between spaces.
- Widening the podium stairway will conflict with the current positioning of the ground floor entrance lobby at the front of the building. The entrance could be integrated better in a different location, allowing the stairway to be opened up. There is also opportunity to use soft landscaping to create a link between the open spaces of the podium and the community garden opposite.
- Connections between the podium and the building will be important for activating the public space.
- Community activity should also be brought on to the podium, to ensure the space is used by the public as well as residents.
- For the central podium to be actively used the podium must be environmentally pleasant. There should be a more generous use of trees and planters on the podium stair to make it an inviting space. The construction of the planting areas will need careful thought to ensure the structure, planting depth and irrigation allow plants to grow successfully at street level, podium and terraces.
- The new building should take opportunities to improve permeability and increase the generosity of existing connections.
- Treatment of Ingestre Road to the north will be an important element in improving the public realm. Consideration should be given to the type of space this should be, and to whether a shared surface could be introduced.
- The nature of the planned communal spaces should be explored in more detail to develop a clearer sense of their qualities.
- The proposals include two north facing balconies, if possible these should be relocated with a more desirable orientation.
- Circulation space for residents at the core of the blocks seems constricted and dark, this should be generous enough for people to stay and talk without blocking access and allow people to sit beside the lifts if needed. Daylight should be brought into the cores so the space doesn't rely on artificial light.
- Opportunity should be explored to make connections between the core internal spaces and outside spaces.

5.6 Full Review – 19th January 2018

- Whilst attempts have been made to address the panels previous comments there remain serious issues to be resolved. The applicant has not addressed the panels concerns regarding the scheme's microclimate,

public space and scheme's massing in relation to neighbouring buildings. The panel is not convinced that the site can accommodate the volume of development proposed. The panel continues to encourage further thinking to develop a rationale for massing that is more clearly related to the existing estate buildings.

- A high quality development on this site could set a benchmark for future developments in the surrounding area.
- The panel feels the massing of the scheme does not work in relation to the surrounding buildings. The stepping between heights of the blocks is at a very small scale and only around the edges and does not reduce the overall bulk.
- More generous public spaces would be welcome as part of the design both for the benefit of residents and the wider community.
- There is scope to refine the internal layout to avoid an institutional feel and improve access to public facilities.
- More thought should be given to the layout of units and encouraged more thought about fenestration to maximise views out. However floor to ceiling windows should be avoided.
- The long term success of the development will also depend on management, and the panel is concerned that this will be taken on by an organisation not currently involved. Input from the management organisation would be invaluable to ensure that the communal concept driving the design is well thought through.
- The blocks could be realigned to create a clearer relationship with surrounding estate. They are currently aligned and stepped from north to south, at odds with the east-west alignment of the surrounding estate blocks.
- For the development to work at the current height, it should step back from the site boundary to give more space to surrounding public routes.
- Widening the steps and introducing planting on the stairs has improved the connection between the podium and Ingestre Road. However the landscaping should be more connected to its surroundings.
- There is an important opportunity for development to improve the legibility of the site, by introducing clearer routes. The panel feel the current proposals don't make the most of this opportunity.
- The layout has improved following rearrangement of the ground floor plan however further improvements could be made to create more active frontages on surrounding public spaces.
- The café is likely to be the most public area but it is not at the same level as the pavement. It is not obvious the café is public, access should be directly from the public space outside.
- The layout and hierarchy of internal public, semi-public and private spaces should be clarified to ensure the building is less institutional in feel. Uses should be clustered to simplify layout.
- The panel asks whether self-contained houses or maisonettes could be considered, as these would create natural surveillance with their own entrances fronting onto public routes.
- The development should present a clear narrative to attract people to downsize. However it is not yet apparent what the development offers to

residents that is different. This is a missed opportunity, as the development could be a trail-blazer for a new type of retirement living.

- The flat layouts and double-loaded corridors don't seem generous or different to a standard block of flats. The plans also don't appear to provide extra space for the care requirements of older residents, such as nursing space or room for wheelchairs. The design should respond by providing for the needs for the intended community of residents.

5.7 Full Review – 11th May 2018

- The panel feels that the designs have progressed well, and the panel welcomes the revised form and heights and more generous public realm now proposed. In particular the panel supports the decision to create a U-shaped block enclosing a south facing courtyard. This creates a simpler relationship with Ingestre Road. The reduced height is more appropriate to its surroundings.
- Only minor amendments to the design are suggested, which the panel are confident the design team can address with Camden officers.
- The panel suggests different location for bikes and bins and the use of lift to bring these to street should be avoided.
- Privacy issues with ground floor bedrooms would benefit further thought. The panel questions the security and practicality of balconies 500mm above ground level. The panel also questions the value of the bridge over the sunken courtyard space to the south of the site. The panel feels floor-ceiling windows can compromise privacy, especially at ground floor.
- The panel would encourage the design team to think about how the architecture could be refined to reflect its community use and not just a block of flats.
- The panel felt the central, set-back fifth floor could be successful and if carefully detailed could add interest at roof level. The panel queries whether this should be in a different material and suggested it could be more in keeping with the building as a whole if constructed in brick.
- The elevational treatment of the courtyard spaces works well, and the idea of creating communal interaction in the space is positive.
- The rusticated brickwork at ground level could cause problems with people attempting to climb it, and is not in spirit of original estate, the panel suggests it is not necessary.
- Significant improvements have been made to the quality of the public realm around the schemes edges, addressing the panel's comments from last time.
- The connection along the east side of the building is an important benefit for the estate, providing better access to community centre. However, the plans no longer include a central axis with a lift. Instead access should also be improved as far as possible along the west side of the building.
- The trees to the north-west corner on Ingestre Road seem too close to the building's façade. The design team should ensure there is sufficient space between them and the building.
- The public space on Ingestre Road could include benches with armrests, which would be very useful for older residents, these could also be added to the internal courtyard.

- The sunken courtyard needs to be as sunny as possible, the panel questioned the need for the bridge, it may also cause privacy issues for nearby units. Another route should be considered to allow residents to access the community centre.
- Light into the basement areas of the gym are important to maximise quality.
- Generous windows are shown on elevation, which is welcome for views and light but detailed design needs to avoid solar gain.
- The panel does not need to review these designs again, and is confident that refinements suggested above can be resolved in discussion with officers.

6 CONSULTATION SUMMARY

STATUTORY

6.1 Thames Water – No objection

- Recommend inclusion of an informative regarding water network and water treatment infrastructure capacity.

6.2 Designing out Crime – No Objection

- The Designing out Crime officer met with the applicant prior to the submission of the proposals.
- Made recommendations to ensure the development could achieve 'Secured by Design' accreditation post planning.

Local groups/stakeholders

6.3 Kentish Town Neighbourhood Forum(KTNF) Response

- The KTNF have been consulted by the developer prior to the submission of the application and met with the developer on site. The Forum were supportive of many aspects of the initial design approach although concerned with the height and its relationship to neighbouring buildings.
- Following amendments to the design the Forum were consulted again and felt that the revised proposals had lost the sensitivity to the site context and seemed overly defensive and cut off from the rest of the estate. There were also public realm issues that were problematic. The current proposals have not addressed these issues.
- The Forum's comments are made in relation to specific policies in the Neighbourhood Plan, mostly in respect of Policy D3: Design Principles. D3 a) Site Context
- The estate has a number of positive attributes such as sensitivity to the topography, a sense of openness and a human scale. The building form is modulated by a stepping profile which is characteristic of the estate. Although it is not the highest quality architectural design, the estate has matured over time.
- There are some successful open spaces, the most important being that at the centre of the site adjacent to the community centre. This space is at the highest point of the estate and has an open aspect to the north. It is

surrounded by single story housing and provides access to the community centre and previously the care home. It is an appropriate setting for communal life of the estate.

- The applicant has not addressed the qualities of the two storey housing and the communal space. The renderings of existing buildings in the planning applications are faint outlines with no representation of materiality.
- An understanding of the site context has not been demonstrated, and the scheme therefore fails to meet the policy requirements of D3a), D3 b) and c) Building Design
- The proposed development is out of scale with the existing buildings on the site. The building is a large monolithic block with little modulation of the overall mass to relieve it. From the north the building looks too large for the site and is overbearing. This impression is exacerbated by the narrow pavement on the east side.
- It has the appearance of a chain hotel with bedrooms packed in, rather than accommodation for elderly.
- To the south the building has a harmful impact on the communal open space, mainly because the 5 storey building height which abuts the single storey housing and blocks out the view north. There is no attempt to step down the scale of the building to meet that of the adjoining buildings, as requested by the Forum during their site meeting.
- The design of the building is not integrated with the existing estate. The bridge over the sunken garden seems to want to indicate it is accessible from the communal space but the opposite is the case, as it is for use of the residents of the new development only.
- None of the visuals show what the building will look like viewed from the communal space. An accurate view should be prepared to enable a proper evaluation of the impact. The bird's eye view provided in the Design and Access Statement minimises the impression of any height differential.
- The open space adjacent to the community centre is one of the successful spaces on the estate. It is clear that the mass of the new building would have negative effects on the space and amenity of residents, due to the contrast in scale, lack of modelling and lack of views through to relieve the sense of enclosure and overlooking.
- Overall the proposed building is too large for the site. The proposals contained within the application do not meet the policy requirements of the Kentish Town Neighbourhood Plan D3 b and c as they are not integrated into their surroundings and they do not reinforce and enhance local character or draw on design cues of the existing, including building form, scale, height, massing and modulation.

Officer's response:

- *Issues of design are discussed in section 12 below. Officers have considered the design in consultation with the Camden DRP and consider the proposed development would respond to the surrounding context and has been reduced in height from the pre-application*

discussion to result in a development that would complement the character of the surrounding area.

6.4 Committee of the Ingestre Estate Tenants and Residents Association (TRA)

- The proposed building will negatively impact on the environment of our estate and the lives of those who live on it.
- We feel this application has been intentionally presented in an unduly complicated manner due to the number of documents with no organisation of the information.
- We object to the overall height which will overlook existing properties, take light away and increase fire risks. The daylight and sunlight analysis highlights that this proposal will adversely impact 16.5% of properties in Grangemill.
- The proposed basement provides unnecessary parking and will overcomplicate construction.
- Nothing we can see in the application suggests the construction of this building will not have a considerable negative impact on residents of the estate and the many people who walk and cycle through the estate. Including Le-SWAP sixth-form students who use estate roads throughout the day to walk between Acland Burghley school and the other schools in the sixth-form on Highgate Road.
- The socially exclusive nature of the development will change the nature of the estate. It will provide no new amenity of existing or future residents and does nothing to alleviate real housing needs of families and young people on the estate or in Camden more broadly.
- The nature of the consultation had misrepresented views and has not sought to address major concerns, especially around social issues.
- As an unadopted (private) road the cost of maintaining the fabric of Ingestre Road are passed directly to the leaseholders, freeholders and tenants of the Ingestre Estate. The additional traffic will place extra burden on the road, beyond its design limits, which is simple unacceptable to us who bare the liability of its upkeep.
- When the Old Peoples Home was sold by Camden to the developer the Directors of Four Quarters (Ingestre Road) Ltd made a promise at a meeting of the TRA that any new building would not exceed the height of the current one. This scheme clearly reneges on this promise.

Officer's response:

- *Due to the scale of the development there are a number of supporting reports that are required to demonstrate to officers that the proposals would accord with the relevant policies. Although these can be complex each report comes with an Executive Summary which outlines the main conclusions of the report.*
- *In respect of design please see section 12*
- *Matters of the basement impact are assessment in section 16 and parking in section 22.*

- *As noted in Section 22 a Construction Management Plan would be secured as part of the development. This would ensure that pedestrian routes are maintained during construction. Following construction there would be a number of public realm improvements.*
- *The development has been designed with the integration of future and current residents in mind. Elements of the development would be accessible to the public and the development would unclude improvements to the local public realm which would benefit the wider community.*
- *The road is managed by the Council any works of repaving will be undertaken in accordance with the Council palette of materials.*
- *Officers are assessing the proposals put before the Council in the current application.*

6.5 Achland Burghley School

- We are positive about the opportunities for increased engagement that the proposal will present us with, opportunities for work experiences in a range of fields such as construction, engineering, caring, retail/customer service, beauty therapy, gym etc, as well as opportunities for school students to interact with older members of our community. We hope that the physical improvements to Ingestre Road that will result from this work will be a significant benefit from the perspective of safety for our students and local residents.
- We understand there will be some disruption to the school caused by the construction process and would expect construction workers to work proactively to keep this to a minimum and for them to remain conscious at all times.
- We are aware there is a strong feeling against the proposal from the residents in the local community based on concerns that the building will negatively impact on them. We place great emphasis on forming positive relationships with our community.

Officer's response:

- *A Construction Management Plan secured via Section 106 legal agreement will minimise any disturbance of the construction.*
- *Work experience placements will be secured as part of the Section 106 legal agreement.*

6.6 Spanish Nursery

- The community Centre is old and its structure if fragile, the impact of heavy works so close makes me very worried.
- The objectors has raised concern with the CMP.

Officer's response: A basement Impact Assessment has been provided which has been independently assessed and considered in accordance with the policy and guidance. A Basement Construction Plan will also be secured via the Section 106 legal agreement. With regard to the points on the CMP as discussed within section 22 this is a draft document a full document will be drawn up in consultation with local residents and businesses.

Adjoining Occupiers

- 6.7 A site notice was displayed from the 4th October 2018 until the 28 October 2018. A press advert was placed on 3rd October 2018 in the Ham and High.

Representations summary

Letters of objection

- 6.8 31 objections were raised from 24 properties neighbouring the site in Grangemill, Claver, Fleeter Court, Little Green Street, College Lane and Ingestre Road on the issues outlined below. These issues raised are considered in the relevant section of this report.

Principle

- The development will have a negative and lasting damaging impact to the physical and social fabric of my community. In the short term it will increase noise and air pollution, reduce safety for existing residents and cause access and parking difficulties. In the long term the plans contravene the idea of cohesive and just society and are negative example of gentrification rather than renewal.
- The applicant presented the plans as motivated by efforts to relieve pressure on the NHS, make a café accessible and beautify the estate. These are offensive to our intelligence and judgement. It will cater to those on high incomes and conflict with existing residents on moderate to lower incomes.
- Four Quarters have built a gated community adjacent to the estate with houses costing 1.6 to 1.9 million, driving a clear wedge between the rich and the rest.
- The proposed units will not meet social care needs of people dependent on NHS and there are sufficient cafes in the local area.
- It is unacceptable morally and politically for the Council to approve the planning application that reinforces social inequalities and makes lives less livable for ordinary citizens.
- The developers are in deep mistrust by everyone on the Ingestre estate and wider. Their adjacent development (Wilbin Court), has left a bitter legacy of resentment. Putting such an 'exclusive' gated development in the middle of such an inclusive area offended everyone. Four Quarters are being pursued for compensation but they respond only with silence or unconsidered dismissal. This makes any promises they make disbelieved.
- This is a business scheme to make profit from wealthy people from elsewhere it represents a change from inclusion to exclusion.
- There is a wider fear this is the first stage of 'class-cleansing' as this has happened in other London Boroughs.
- I don't feel like there is any consideration for the rest of the residents on the estate.
- The arguments by the applicant that the land use should be housing and not care home; that all apartments are above the recommended space standards required; the large ground floor reception area and the

unjustified need for a basement (which contains amongst other things, perhaps the most expensive lift accessed, cycle store in Camden), all point in one direction - i.e. this is an application for a project designed to fail, and be easily and quickly adapted to another residential community in our midst, probably "gated". It would take more than a cafe to disguise that intention; and finally, that throughout the project development, there have been frequent meetings with the Design Review Panel, but no mention of seeking their opinion on the contents of the application. The result of the development is institutionalised accommodation.

- The applicant should be requested to eliminate the several dilemmas which the nature of his application has raised, by withdrawing the application and re-submitting it in a form suitable for the purpose and one which will benefit the host community in a meaningful manner.

Officer's response:

- *In term of the proposed land uses see section 8*
- *The neighbouring development at Wilbin Mews is not a relevant consideration in the determination of this application.*
- *In regard to integration there will be elements of the development that will be publically available, furthermore the design of the development takes regard to the surrounding urban grain the development would include enhancements to the public realm which would be a benefit to the local community.*

Design and conservation

- The proposed building goes against the understanding that it will be no taller than the existing structure

Officer's response: The proposed building is considered to be of an appropriate height in the surrounding context as discussed in paragraphs 12.4 to 12.10

Amenity impact

- The daylight and sunlight analysis highlights the proposal will adversely impact 16.5% of properties in Grangemill, a block of council housing. This impacts living rooms and bedrooms. The applications assertion that a bedrooms has less need for light in this context is wrong. The massive over subscription of Camden's housing means properties often have more residents than they were designed for and Camden's own policy states little difference between living rooms and bedrooms.
- The proximity of the proposed building to Grangemill will also affect the privacy of existing properties.
- I strongly oppose as it will directly obstruct my light and view(in Grangemill) that I currently enjoy that was a big reason for me choosing this flat. It will also compromise my privacy.
- It will block light into my property and balcony (Calver), have a detrimental impact on my privacy and a sense of my flat being a safe and comfortable home.
- Impact on privacy of residents within Grangemill.

Officer's response: The applicant has provided a Daylight and Sunlight report which the Council has had independently reviewed, the results of this analysis are discussed in Section 14 along with the impact on residents outlook and privacy.

Transport

- The proposal will lead to increased traffic to the estate, increasing noise and air pollution and reducing safety. Ingestre Road is a critical pedestrian and cycle connection between Tufnell Park and Gospel Oak, it connects the stations and is used multiple times a day by the schools of the LaSWAP sixth form as well as being a safe place for play for children of all ages from on and off the estate. The building will increase traffic through the estate, increased noise and reducing safety.
- As an unadopted road the costs for maintaining the fabric of Ingestre Road are passed directly on to the leaseholders, freeholders and tenants of Ingestre estate. The additional traffic will place extra physical burden on the road, beyond its design limits which is unacceptable to use who bare the liability of its upkeep.
- 50 flats are planned with 10 parking spaces, this seems disproportionate, and where potential new residents were concerns and their visitors, pressure will increase on the existing parking spaces on the estate.
- The size of the proposed building warrants an unacceptable amount of construction time, noise, pollution and disturbance to residents.

Officer's response: See section 22 on Transport.

Access

- Access for disabled people will be restricted during the lengthy construction period due to the obstruction to the road, preventing mobility vehicles from moving and parking.

Officer's response: As part of the Construction Management Plan details of pedestrian routes around the site during construction will be provided.

Building works

- The building works will present an increased risk of subsidence to nearby properties such as Grangemill

Officer's response: The applicant has provided a Basement Impact Assessment which considers the impact of the basement excavation works on the stability of surrounding building, it is considered acceptable as discussed in Section 16. A Basement Construction Plan will also be secured via Section 106 legal agreement.

Procedural concerns

- There are reams of meaningless data which are impossible for members of the public to interpret. Information should be relevant. The nature of this submission (the likes of which I have never seen before) appears to be

the result of an applicant swamping all recipients with a mess of data, and who clearly has sufficient time and money to do so.

- That the application has been received and registered as "valid" is indicative of a Local Authority devoid of appropriate staff and funding, sufficient to even quickly review, prior to distribution. The list of documents attached alone, should have rung all the alarm bells, that something is not quite right.

Officer's response: Given the scale of the proposal as a major development, the reports that support the proposals do contain a large amount of data. However officers require the data to ensure they support the recommendations of the report. Each report such as the Daylight and Sunlight does provide Executive Summaries or a summary of the data for residents to be able to consider the conclusions of the report. The application was validated in line with the Councils Local Area Requirements and considered valid as it contained sufficient information.

Other issues

- The scale and height of the proposed building and its proximity to existing buildings creates a new fire risk. At a time in the wake of Grenfell disaster, when there is so much emphasis on fire safety and the current fire regulations are left wanting. Camden should not allow the building of a block which places existing properties and residents at greater risk. The presence of car parking in the basement further increased the risk.
- Making a six storey tower block and putting old people in it seems like a bad idea in light of Grenfell tower. Squeezing a tower into such a constricted space is dangerous and overcrowded and now a good idea and adds to risk such as fire and congestion and hazards to us existing residents.
- It is not acceptable, both morally and legally for the Council to approve an application which is in breach of the above.
- Seems like greedy money making scheme instead of refurbishing the existing building. I vigorously object to this mad idea. As my Council you are supposed to protect me from this sort of thing.
- Four Quarters have already detracted from the estate's green spaces by building high density luxurious housing and catering with landscaping to their residents, while presenting the community with views of fences and walls.
- There have been car fires in the estate, who will take responsibility if you squeeze all this in, upset the locals and then in the future if there is a disaster like Grenfell you will have to say you allowed it.

Officer's response:

- *A fire strategy is to be secured via condition as part of the development. Such a strategy would address how residents would exit the building in the event of a fire and what measures will be implemented to assist them. The fire safety aspects of the development will also be assessed as part of the Building Control legislation.*
- *The Council considers applications against the relevant policies and legislation with officers making a recommendations based on these.*

- *The development of a nearby site is not a consideration in the assessment of this application.*
- *It is acknowledged the estate has some anti-social behaviour issues and this development will redevelop the site offering a number of benefits which should improve passive surveillance in this part of the estate which should assist in reducing anti-social behaviour.*

Letters of comment/support

6.9 1 letter of comment was received from a resident within Fletcher Court neighbouring the site, this is summarised below.

- I personally don't have any objections to the plans but strongly ask that the developers must also update the painting to the estate and put money towards gating off the underneath of the garages to stop antisocial behaviour motor bikes gangs from gathering and flytipping which are all big problem and will affect the new residence of the new build.

7 POLICIES & Guidance

7.1 National Planning Policy Framework 2019

7.2 The London Plan 2016

7.3 The London Plan Intend to Publish (2019)

7.4 Mayor's Supplementary Planning Guidance

7.5 Camden Local Plan (2017)

- G1 Delivery and location of growth
- H1 Maximising housing supply
- H3 Protecting existing homes
- H4 Maximising the supply of affordable housing
- H6 Housing choice and mix
- H7 Large and small homes
- H8 Housing for older people
- C1 Health and wellbeing
- C2 Community facilities
- C5 Safety and security
- C6 Access for all
- E1 Economic development
- A1 Managing the impact of development
- A2 Open space
- A3 Biodiversity
- A4 Noise and vibration
- A5 Basements
- D1 Design
- D3 Shopfronts
- CC1 Climate change mitigation
- CC2 Adapting to climate change
- CC3 Water and flooding

CC4	Air quality
CC5	Waste
TC3	Shops outside of centres
T1	Prioritising walking, cycling and car-free development
T2	Parking and car-free development
T3	Transport infrastructure
T4	Sustainable movement of goods and materials
DM1	Delivery and monitoring

7.6 Supplementary Planning Policies

Camden Planning Guidance

Access for All (2019)
 Air Quality (2019)
 Amenity (2018)
 Basements (2018)
 Biodiversity (2018)
 Design (2019)
 Developer Contributions (2019)
 Energy efficiency and adaptation (2019)
 Interim Housing (2019)
 CPG 2 Housing (2019)
 Planning for health and wellbeing (2018)
 Public open space (2018)
 Town centres and retail (2018)
 Transport (2019)
 Trees (2019)
 Water and flooding (2019)

7.7 Other documents

Kentish Town Neighbourhood Plan (2016)

Policy D3: Design Principles
 Policy GO3: Biodiverse Habitats
 Policy CC1: Pre- Application Consultation
 Policy CC2: Statement of community consultation and statement of neighbour involvement

ASSESSMENT

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

8	Land use principles <ul style="list-style-type: none">- Loss of care home use- Proposed residential use- Proposed commercial uses
9	Tenure and unit size mix of the proposed housing <ul style="list-style-type: none">- Policy review- Mix of unit sizes- Tenure mix- Viability and affordable housing
10	Density and infrastructure
11	Amenity of proposed housing <ul style="list-style-type: none">- Policy review- Design and layout- Daylight, sunlight and aspect- Noise and vibration- External amenity space
12	Design <ul style="list-style-type: none">- Policy review- Principles of proposed design- Proposed height/massing and integration with surrounding context- Elevations, materials and detailing- Conclusion
13	Masterplan, landscaping and trees, Open Space <ul style="list-style-type: none">- Policy review- Designations- Masterplan- Trees- Conclusion
14	Impact on neighbouring amenity <ul style="list-style-type: none">- Policy review- Relevant properties- Daylight and sunlight- Outlook- Noise and disturbance- Overlooking

15	Land contamination
16	Basement Impact
17	Air quality
18	Sustainable design and construction <ul style="list-style-type: none"> - Policy review - The site and the proposal - Internal consultee comments - Energy - Sustainability - Living roofs/walls
19	Flood risk and drainage
20	Nature conservation and biodiversity
21	Accessibility
22	Transport <ul style="list-style-type: none"> - Policy review - The site - Trip generation - Travel planning - Cycle parking - Car parking - Construction management - Deliveries and servicing - Public Highway Improvements directly adjacent to the Site - Pedestrian, Cycling and Environmental Improvements in the local area - Excavation in close proximity to the public highway - Conclusion
23	Safety and security
24	Refuse and recycling
25	Employment and training opportunities
26	Planning obligations
27	Mayor of London's Crossrail CIL
28	Camden CIL
29	Conclusion

30	Recommendations
31	Legal comments
32	Conditions
33	Informatives

8 Land use principles

8.1 The principal land use considerations are as follows;

- Loss of care home use
- Proposed residential use
- Proposed commercial uses

Loss of care home use

8.2 The change of use of the site needs to be justified in accordance with Policy H8 (Housing for older people, homeless people and vulnerable people). The policy notes that the Local Planning Authority seeks to protect such uses and will therefore need to be satisfied that development involving the loss of care home is justified. The proposed redevelopment would need to be evidenced and assessed against the policy and criteria as set out within policy H8 (points (f) to (j)).

- (f). the existing housing is shown to be surplus to needs within the borough; or
- (g). it can be demonstrated that the existing homes are incapable of meeting contemporary standards for the support and/ or care of the intended occupiers; or
- (h). adequate replacement accommodation will be provided that satisfies criteria
- (i). the loss of floorspace is necessary to enable the development of housing for the same intended occupiers that satisfies criteria (a) to (e) and is better able to foster independent living and meet any changes in their support and care needs; or
- (j). the development will otherwise enable the provision of an alternative form of housing or support that better meets the objectives of the policy and the Local Plan.

8.3 As noted above in the background section, in a Council Cabinet Report dated 19/02/2013, it was agreed to dispose of three Council owned care homes which were considered surplus and move their residents to two modern, fit-for-purpose care homes at Maitland Park and Wellesley Road. At Ingestre Road the residents were moved out in 2013 and moved to Maitland Park and the care home was closed. Given the Cabinet decision to close the 'surplus' care home at Ingestre Road and that the facilities were re-provided elsewhere,

demonstrates that the loss of the care home use on this site meets the criteria of Policy H8 above.

Proposed residential use

- 8.4 The development is proposing 50 residential units which are to be for over 55's. The housing has been designed to meet the needs of older residents, with varying levels of care and support available on site. The units would be self-contained, allowing for independent living, but with care support available 24 hours a day at hand and on call if needed.
- 8.5 The development will provide a range of associated services and facilities for residents of the development and some which will also be publically accessible. For example there will be a gym, fitness room, hobby room and residents lounge for access only for residents of the development. With two publically accessible commercial units to the ground floor which the applicant is proposing to be a café/newsagent and hairdresser with access directly from Ingestre Road.
- 8.6 Although the units are to be secured for over 55's and have been designed as such, they are laid out as self-contained units and therefore are considered as a C3 use.
- 8.7 The principle of new residential floor space is strongly supported as a priority land use under policy H1. Housing is the priority land use for Camden and the Council seeks to maximise the supply of new housing for all age groups. The principle of housing on the site therefore complies with policy.

Proposed Commercial use

- 8.8 In respect of the two commercial units to the ground floor, these would be available for occupants of the new development and the wider community. The site itself is not located within a town centre or neighbourhood centre. Policy TC1 allows for a limited provision of small shops outside centres to meet local needs. Both units would be considered small as they are both under 100sqm. It is therefore considered their inclusion in the development would be in accordance with Policies TC1 and TC5. Furthermore it is important to note that the provision of these units which would be publically accessible would provide an opportunity for local residents to integrate with the development and its residents.
- 8.9 In light of the above, it is considered the proposed land use would be acceptable within the sites context and would accord with the relevant policies of the Local Plan.

9 Tenure and unit size mix of the proposed housing

- 9.1 The considerations with regards to tenure and unit size and mix are as follows:
- Policy review
 - Mix of unit sizes
 - Tenure mix
 - Viability and affordable housing

Policy review

- 9.2 Policies H1, H2, H3, H4, H5, H6, H7 and CPG2 (Housing) are relevant with regards to new housing, including to tenure and unit size.

Mix of unit sizes

- 9.3 Policy H7 requires homes of different sizes. The proposed unit mix should broadly accord with the Dwelling Size Priorities Table in this policy, although the Council will be flexible when assessing development.
- 9.4 The proposed unit mix across the whole site is 1 x 1 bed, 41 x 2 bed and 8 x 3 bed.
- 9.5 With regard to unit mix, Policy H7 sets out the targets for market housing which identifies 2 and 3 bed units to be in high priority. The development would be providing almost all 2 and 3 bed units. Given the end users of the development are over 55s who are likely to downsizing properties it is considered that the high proportion of 2 bed units would meet their needs. It is considered that the proposed mix would meet the needs of this particular tenure and would accord with Policy H7.

Tenure mix

- 9.6 Under London Plan policies 3.10, 3.11 and 3.12, Camden Local Plan policy H4 and CPG2 (Housing), 50% of housing provision should be affordable for developments with a capacity of 25 or more additional homes. The proposed development would provide 100% private market units. The lack of on-site provision is down to the viability of the development, which is examined and discussed below.

Viability and affordable housing

- 9.7 The applicant has submitted a viability report (by DS2) to evidence why they are unable to provide a policy-compliant level of affordable housing (50%). A viability expert, BPS, has independently assessed this report for the Council. Negotiations for the affordable housing have been ongoing for the duration of the application timeframe.
- 9.8 The applicant's initial viability appraisal concludes that the development produces a deficit of £3,812,765 without the provision of any affordable housing and therefore the inclusion of affordable housing would further increase this deficit. The applicant's viability appraisal noted that the developer would be willing to make a contribution to affordable housing of £480,277, due to the Council's prioritisation of affordable housing and are making this offer without prejudice.
- 9.9 The applicant has proposed a Benchmark Land Value for the site of £1, accepting that refurbishment of the former care home on site would not be viable. The applicant also chose not to pursue an alternative site value approach. The applicant acquired the site for £4.5m from the Council. BPS are satisfied with this notional value which works to enhance the viability of the

scheme. However, BPS questioned why the applicant would pursue a development when the residual appraisal shows a loss of £3.8million.

- 9.10 BPS evaluated the development as private residential units taking into account the age-restricted market. This assessment also sought to reflect the value of the proposed additional on site facilities which include landscaped courtyard space; communal bars, lounges, and hobby areas; a cafeteria (which will be open to the public); a mini-gym (discounted for members and restricted to public over the age of 55); hairdressing (open to the public); care consultation rooms; guest suites similar to hotel rooms and staff/ laundry facilities.
- 9.11 BPS are of the view these facilities add a premium to the value of the units in the scheme over comparable new build units which do not have the benefit of such facilities. BPS note that the construction costs involved in creating the space for these facilities carries a significant cost, which if it were to be recouped in full would require a 26% premium to be achieved on the applicant's estimated achievable values. With this premium in mind BPS conclude that the Gross Development Value (GDV) of the development is circa £48 million. With a GDV at this level BPS consider that a PIL of £3m is deliverable. Therefore the scheme can afford to provide for affordable housing.
- 9.12 Following BPS's initial review of the viability report, the applicant disputed the values used by BPS to estimate the GDV of the residential element. The applicant considered that it should be valued at £875 per sq ft and BPS considered a minimum higher rate of £1,005 sq ft to be applicable (£1,100 reflecting 26% premium). The applicants' consultant argued the lower value for the following reasons:
- On-site presence of a gym, hairdresser and café. The applicants' consultant notes when senior living developments include these facilities, but are open to the public (as they would be in this case) they do not tend to see considerable value benefits to the residential units as an operator cannot justify a premium for exclusivity.
 - The applicant provided further evidence, in the form of valuations of similar products from 3 different surveyors justifying their value per sq ft.
 - The location of the site including nearby London Overground train tracks and the site being within a local authority estate.
- 9.13 Although there is agreed to be some validity to these points, BPS questioned the inclusion of the additional facilities uses if they were assumed to generate nil value benefit. It was felt that some of the additional evidence provided was not comparable to the proposed development as it was for new-build non-age restricted residential schemes, and did not therefore reflect the general premium achieved for retirement living products. This is distinct from extra care schemes as provided by the subject scheme where BPS argue a further premium should be achievable.
- 9.14 BPS make reference to the recent Gondar Gardens appeal where reports were provided by Alder King (a property consultant), on the relationship of values of this type of scheme to prevailing residential values indicating a typical 158%

premium was achievable in comparison to general need market housing. With this in mind a key consideration is whether the 'extra care' facilities in the proposed development add sufficient value to the scheme to justify a significant premium over general market values. The applicants view is that this development is more comparable to a residential development which would have 24hr concierge and accessibility to local facilities.

- 9.15 The applicant has provided detail that the annual service charge would be around £10,911 per unit, totalling £545,550 from all units in the development per annum. This includes £40,000 for one-hour domestic assistance to each apartment, £200,000 for staffing 'for the provision of 24 hour care', £10,000 for staff training and uniforms, £3,000 for 24 hour emergency monitoring services. There is then £100,000 for on site caterers which includes their running costs, staffing and maintenance. With these figures in mind BPS consider this implies there are services/care being provided that might warrant a premium on value, not to mention the benefit offered by the facilities. BPS have compared the proposed development to more basic McCarthy & Stone and Churchill developments, which achieve clear premiums over market values.
- 9.16 Further clarification was sought in regard to service costs and mandatory or elective services. The applicant provided a Framework Operational Plan (FOP) which explains there will be a 'care menu' that will be tailored to individual needs. Shared facilities as detailed in the FOP would be nursing and domestic care, landscaped courtyard, communal bars, lounge, hobby area, café, mini-gym (access to the public for over 55 only), hairdressers, care consultation room, guest suites for visitors, laundry and staff facilities. With this information BPS are satisfied that the service charges set out are reasonable.
- 9.17 For the first addendum review BPS concluded that after amending their capital values for the commercial space which they considered potentially over optimistic, the residual land value of the site falls to £291,538 allowing for a site value of £1. This is before application of a premium to reflect the benefit of the additional facilities. BPS remain convinced that a significant premium should be attached to the residential values.
- 9.18 The only circumstance where BPS consider a premium may not be evidenced is where the developer seeks to impose significant event fees which can have the effect of suppressing unit values but which represent another income stream to the developer. Event fees, also called Transfer, Exit, Assignment or Deferred Membership Fees, are charged by many retirement community Operators and are payable when the owner of a residential unit sells that unit. Event fees typically range from 1%-30% of the gross resale value of the unit at the time of exit. The balance of the proceeds of the unit's resale accrues to the resident's estate. Such fees, which provide a valuable annuity stream to Operators, are becoming commonplace in the retirement community sector in the United Kingdom.
- 9.19 With the above in mind, the applicant and the Council have not managed to reach an agreement on the value of the proposed residential units, principally regarding the level of premium which should be applied to the base sales

values. Given that extra care developments represent a relatively new market it is very difficult to provide certainty through reference to comparable sales evidence as would normally be used to test conventional residential values, due to their scarcity. To enable the application to move forward, officers and BPS have decided that the best way to deal with this uncertainty therefore is to negotiate a package of contributions for affordable housing, which would be secured via the Section 106 (S106) legal agreement:

- An upfront payment in lieu of affordable housing of £1 million, paid on implementation of the development. To achieve this value the applicant's GDV of £37m120,125 would need to be increased by 19% to £44,162,347.
- The S106 legal agreement to exclude the ability of the developer / operator to charge an event fee; and
- Outturn viability review wherein any surplus is offered to the Council as a payment in lieu, and any surplus in excess of that identified by BPS is split between Council and applicant.

9.20 The applicant still maintains that the uplift in sales values necessary to secure a viable PIL contribution of £1m significantly exceeds their expectations and consequently the late stage review would need to reflect their assessment of GDV and be treated as a scheme in deficit under recent GLA Guidance to the point where the £1m payment is seen to be viable, with any surplus thereafter divided between the applicant and the Council.

9.21 With regard to point 2 above, this provision in the S106 Agreement is considered necessary to prevent the imposition of event fees have a suppressing effect on sales values achieved by the scheme, thereby maximising the potential for additional payments to be made by this development at late stage review.

9.22 This offer has been reviewed by officers and the Council's independent consultant and it is considered to be reasonable and the most effective way of ensuring the Council will receive the maximum level of payment towards affordable housing, in accordance with the objectives of Policy H4.

9.23 Consideration has been given to the practicality of on site affordable provision. It is noted that the design of the scheme does not lend itself to providing units which can be physically separated or which do not benefit from the proposed shared facilities. Consequently, any affordable units in the scheme would be subject to the very high service charges proposed which would significantly impact on the value of the affordable units and their affordability to residents. Therefore, off site provision would offer the prospects of a much higher level of unit delivery than could be achieved within this scheme.

10 Density and infrastructure

10.1 In order to make the most efficient use of land and meet the objectives of policy G1, higher density development is encouraged in appropriately accessible

locations. The emphasis on higher density development is reinforced by policy H1 (Maximising housing supply) of the Camden Local Plan, but should at all times be subject to other policies such as those protecting resident and neighbour amenity and securing the height, bulk and massing appropriate to an area in terms of good design.

- 10.2 Policy 3.4 of the London Plan requires development to optimise housing output for different types of locations taking into account local context, design and transport capacity as well as social infrastructure, open space and play space. Table 3.2 of the policy sets out various density ranges as a guide according to the urban setting and accessibility criteria.
- 10.3 The proposal features 157 habitable rooms (hr) on an area of 0.18 hectares. The site density of the proposal is therefore 872 hr/ha. The London Plan Density Matrix for a site in an 'urban' setting within PTAL 4-6 is 200-700 hr/ha.
- 10.4 The proposed density is not considered to be significantly above the density matrix guidelines. Furthermore, the Density Matrix is just a guide and what is acceptable on a given site will turn on a variety of considerations rather than rigid application of the matrix. The density matrix's density ranges for particular types of location are broad, enabling account to be taken of other factors relevant to optimising potential – local context, design and transport capacity are particularly important, as well as social infrastructure, open space and play. The London Plan requires that the potential of sites is optimised. Given the site's PTAL rating, its location close to Tufnell Park Station and both Dartmouth Park Hill and Highgate Road which are well served by bus routes, it is considered that the proposed density is acceptable subject to design, heritage and amenity considerations.

11 Amenity of proposed housing

- 11.1 The considerations with regards to the amenity of the proposed housing are as follows:
- Policy review
 - Design and layout
 - Daylight, sunlight and aspect
 - Noise and vibration
 - External amenity space

Policy review

- 11.2 London Plan policies 3.5 and 3.8 and Camden Local Plan policy H6 are relevant with regards to the amenity of proposed housing.

Design and layout

- 11.3 New development should conform with the minimum space standards set out in Table 3.3 of the London Plan (see below) and Camden Planning Guidance on Housing.

Table 3.3 Minimum space standards for new dwellings⁵⁷

Number of bedrooms	Number of bed spaces	Minimum GIA (m2)			Built-in storage (m2)
		1 storey dwellings	2 storey dwellings	3 storey dwellings	
1b	1p	39 (37)*			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4.0

11.4 All of the proposed units would meet the space standards set by the London Plan, with suitable sized storage. Units would be stacked over the levels to ensure living areas are over living areas and bedrooms over bedrooms to minimise the impact on future residents amenity. All units would benefit from their own private amenity space in the form of terraces, balconies and winter gardens, none of which would be north facing. Although not all balconies would reach the policy target of 9sqm per person, the residents would also benefit from the south facing central courtyard and an amenity terrace, there would also be internal areas which can be used as amenity space. It is therefore considered in terms of unit size and amenity space the development would provide housing with suitable amenity.

11.5 Policy requires 10% of units to be wheelchair accessible. 6 units would be fully wheelchair accessible, which represents 11%.

Daylight, sunlight and aspect

11.6 Given the layout of the proposed buildings, all units would be dual aspect. It is considered they would receive a sufficient level of light and received a good outlook.

11.7 The applicant submitted a daylight and sunlight assessment in respect of the levels of light received into the proposed units. This has been independently reviewed by the Councils consultant and whilst they used a more appropriate window light transmittance calculator what the applicant has provided is considered to be acceptable.

11.8 With regard to sunlight, there are some units with living/dining/kitchen areas with north facing windows, however these are all dual aspect with additional windows to the southern façade of the building. It is important to note that the independent assessor would agree with the applicant's consultant that occupiers of the living/dining/kitchen areas with a northerly aspect, would not

have the same expectations of sunlight. The Councils independent assessor considers these units would nonetheless enjoy good morning sunlight and that overall the development would provide good sunlight amenity for future occupiers.

Noise and vibration

11.9 A Noise Assessment has been submitted for the application to determine whether the proposed development can ensure the amenity of future residents is in line with national and local planning policy, plus relevant acoustic design guidance.

11.10 The survey results included in the noise report confirm that the area is relatively quiet.

11.11 Based on the noise survey results and break-in calculations, suitable glazing performance requirements have been proposed. The proposed glazing consists of a double glazing system, 4/20/4 with standard “nonacoustic” trickle vents. Its performance is expected to achieve the Councils internal noise criteria. A condition is recommended to provide detailed calculations in line with BS8233:2014 to ensure that the façade sound insulation is adequate.

11.12 Subject to adequate mitigation measures, habitable rooms within the proposed development are likely to comply with the proposed internal target noise levels. A set off conditions are recommended to ensure that mitigation measures are adequate.

External amenity space

11.13 All units would benefit from a private amenity area in the form of private balconies and terraces. The Amenity CPG notes that all new homes should have access to some form of private outdoor amenity space such as balconies, roof terraces or communal gardens.

11.14 Of the 50 units, 8 would have private balconies that exceed 9 sqm, 14 would have 8sqm balconies and the remaining 28 units would have 7sqm balconies. All residents would also have access to the central courtyard which would be some 211.7sqm and an outdoor terrace from the dining area which would be 109sqm. It is therefore considered that whilst not all of the private balconies would meet the 9sqm, the residents would nevertheless have access to a good level of communal amenity space which is accords with CPG standards.

12 Design

12.1 The Design considerations are as follows:

- Policy review
- Principles of proposed design
- Proposed height/massing and integration with surrounding context
- Elevations, materials and detailing
- Conclusion

Policy review

- 12.2 London Plan policies 7.1, 7.2, 7.3, 7.4, 7.5, 7.6 and 7.7 and Policy D1 of the Camden Local Plan seek to secure high quality development which respects local context and character.

Principles of proposed design

- 12.3 The general approach to the arrangement of the proposed new building is to introduce a street based approach to the site to reinforce Ingestre Road as an important pedestrian route through the estate and to improve legibility. This approach allows the development to make a positive contribution to the estate as a whole.

Proposed height/massing and integration with surrounding context

- 12.4 The proposed building is a 'U' shaped block enclosing a south facing courtyard at first floor level. It rises to five storeys with a set back sixth upper floor and basement. The set back to the upper floor helps to reduce the mass of the building in views from surrounding areas and provides a degree of articulation of the simple form. At five storeys, the shoulder height of the building is approximately one storey taller than surrounding housing to the south and west. The proposal would have very limited impact in longer views and more consideration should be given to its visual effects in the immediate vicinity of the site and its success in integrating with, and enhancing, the surrounding estate.
- 12.5 The north-south alignment of the east and west wings and open frontage to the south is formally appropriate in the context of the orientation of the surrounding buildings. The simplicity of the proposed layout and massing is a response to the complex configuration of the estate. Earlier iterations of the proposed development had adopted a complex, broken massing which was intended to relate to the distinctive surrounding context but was considered by officers and the Camden Design Review Panel to lack a clear logic.
- 12.6 The building is set back from the site boundaries to allow for a more generous public realm and mitigate the effects of the increased density. The three wings create street frontages on Ingestre Road and the east and west site boundaries. As far as possible, the ground and first floors present active frontages to the street. This supports the legibility of the pedestrian connection on Ingestre Road and improved access to the community centre along the west side of the site. Here, in the southwest corner of the site, the pulling back of the building line allows for the widening of, and improvements to, the accessibility of the existing stairs to allow them to conform to modern standards. Furthermore, the addition of new lighting will help to address perceptions of safety.
- 12.7 Most of the proposed communal facilities are located at the ground floor level including a publicly accessible café/newsagents and hairdressers. This is to maximise their benefit in ensuring active frontages. The gym is located in the basement, the main residents lounge is at ground level beyond the reception and entrance area and the first floor hobby room is positioned at the upper ground/first floor level, providing direct access to the courtyard garden.

- 12.8 The enclosed private communal courtyard is visually connected to the podium deck public space increasing the sense of green open space within the estate. It is also physically connected to the podium via a bridge across a sunken communal garden at ground floor level. The south facing aspect to the shared communal garden should maximise the amenity benefits for occupants. It has the potential to be a sheltered, sunlit and inviting garden space so ensuring that it is comfortable and well used and with the prerequisites to become an important outdoor space for sociability between residents to complement the communal indoor spaces.
- 12.9 The layout of the residential floors seeks to keep the number of single aspect units to a minimum. Four of the proposed residential units are provided at ground level. Initially there was concern regarding privacy and security. This has been mitigated by replacing balconies with enclosed winter gardens and the introduction of planted beds to create a buffer between the public and private realms.
- 12.10 The set back of the building from the site boundaries allows for an enhancement of the aesthetics of the public realm through upgraded paving materials and planting. The set back on Ingestre Road and the western site boundary allows for additional street tree planting within the footway. The proposed planted borders between the building edge and footway introduces greening that should help to reduce the visual harshness of materials that currently characterises the estate. On Ingestre Road this represents a considerable improvement to the current relationship of the building to the street which is a cluttered narrow footway dominated by bin storage.

Elevations, Materials and Detailing

- 12.11 The proposed development seeks to integrate with the surrounding estate, by using a red brick as the main facing material. The set back top storey and recessed stair wells on the north elevation would be faced in a complementary dark grey to provide depth and definition to the building form. The metalwork of the window frames and balcony balustrades would be dark grey in colour, departing from the local vernacular of predominantly white PVC frames but setting a new benchmark for the estate in terms of the quality of materials so is considered a positive enhancement.
- 12.12 There is a vertical emphasis to the expression of the building due to the stacking of windows and recessed balconies and the decision to use full height windows with Juliette balustrades. On the northern elevation this is reinforced by a tripartite split into vertical bays to reflect the position of the circulation cores internally. The vertical visual effect is softened by the horizontal banding introduced by the vertical brick cladding to the floor slabs in contrast to the predominant horizontal bond.
- 12.13 At the ground floor north elevation and podium level south elevation, larger glazed openings signal the communal uses within the building. This is particularly important in supporting the legibility of the publicly accessible uses

located on the Ingestre Road frontage. The main entrance to the reception area is splayed to help give definition and prominence to its function.

Conclusion

- 12.14 Overall this is a well considered scheme, the applicant has responded to the advice given by officers and the Camden DRP to amend the footprint of the development to ensure it responds to the urban grain of the surrounding estate and was considered by the DRP to provide a simpler relationship with Ingestre Road than previous revisions. With regard to heights, the proposed development is higher than existing but in the surrounding context it is not considered unduly high. It is considered that the proposals offer a high quality design which could set a standard for design within the estate for any future development.

13 Landscaping and trees, Open space

- 13.1 The Landscaping, public realm and trees considerations are follows:

- Policy review
- Designations
- Masterplan
- Trees
- Conclusion

Policy review

- 13.2 Camden Local Plan policy A2 seeks to protect, enhance and improve access to Camden's parks, open spaces and other green infrastructure.

Designations

- 13.3 The site itself is not designated open space and is a predominantly hard landscaped site. Accordance with Map 2 of the Local Plan the site is within the 280m buffer area, meaning open space is available within 200m of the site. Hampstead Heath is located a 10minute walk to the east of the development site.

Landscaping

- 13.4 The proposed development includes fully landscaped central courtyard together with public realm improvements that surround the site including soft and hard landscaping, street furniture and re-surfacing of existing footway. It is also provided to improve the access to the community centre with the provision of more ambulant steps which would be wider than the existing stair and provided with additional lighting to ensure a safe and usable connection. Given these measures are on land outside of the ownership of the applicant but in Council ownership a payment will be secured via Section 106 legal agreement for the Council to undertake the works.
- 13.5 With regard to the landscaped central courtyard the space has been designed to be flexible and facilitate a range of different activities for residents. It would be a central lawn surrounded with a pathway and growing and planting beds. Details of the planting has been provided during the application. A condition is

recommended to secure the implementation of the landscaping prior to the occupation of the units.

- 13.6 To the sunken patio area, it is proposed to have deep planting beds with a range of shade tolerant planting. Full details of the planting will be secure via condition prior to the commencement of any landscaping works.

Trees

- 13.7 The arboricultural report submitted with the application contains a tree survey in line with BS5837:2012 – “Trees in relation to design, demolition and construction.” The development includes the removal of 6 trees, all of which are low quality and considered Category C trees. The most significant trees within the application site, although not in the ownership boundary are proposed to be retained and protected throughout the development. A condition is recommended to secure details of the tree protection measures during construction.
- 13.8 Of the 6 trees, 3 are owned and managed by Camden. T17, T18 and T19. The Councils Tree Manager, who is responsible for Camden’s own trees, has reviewed the proposals. It has been considered that while the trees are highly visible from the public realm and contribute to the character of the area, due their low quality and small size the loss of visual amenity and canopy cover they provide could be mitigated against through replacement planting.
- 13.9 The proposals include 8 replacement trees, all of which are on Camden’s highway. These would result in a net gain in tree numbers and in canopy cover. The proposed planting would be a vast improvement on the existing trees. Revisions have been received during the course of the application to amend 6 of the trees to the Ulmus New Horizon. The remaining two would be Prunas Padus all of the proposed trees are suitable for the surrounding environment.
- 13.10 The applicant has provided details of the tree pits to ensure they would be able to accommodate the proposed trees and ensure their sustainability.
- 13.11 Beneath the trees on the northern frontage under story planting is proposed. As this is on the public highway these beds would ultimately become the responsibility of the Camden Grounds Maintenance. Therefore prior to the commencement of any landscaping works, the proposed planting or alternative landscaping will need to be agreed with the Council to ensure the planting is part of the palette of planting or materials that can be maintained. Such details will form part of the S106 contribution for the highways work given it lies outside of the applicant’s ownership.

14 Impact on neighbouring amenity

- 14.1 The considerations on the impact on the amenity of the occupiers of neighbouring properties are as follows:
- Policy review
 - Relevant properties

- Daylight and sunlight
- Outlook
- Noise and disturbance
- Overlooking

Policy review

14.2 Camden Local Plan policies A1, A4 and A5 and Amenity CPG are relevant with regards to the impact on the amenity of residential properties in the area. Any impact from construction works is dealt with in the transport section.

Relevant properties

14.3 As shown below the application site is located within residential properties of various sizes and orientations. The properties relevant to the proposed development include:

- Grangemill
- 1-2 Ingestre Road
- Fletcher Court
- 1 Tideswell
- 25 Hambrook Court
- 13-16 Calver



Daylight and sunlight

14.4 A Daylight, Sunlight and Overshadowing Report has been submitted as part of this application which details any impact upon neighbouring residential properties and open spaces. The report has assessed the relevant properties as listed above. The daylight and sunlight report has been reviewed by an independent consultant given the scale of the development, its siting in

relation to neighbouring residents and the level of concern received by objectors.

- 14.5 In terms of methodology used, the assessment has undertaken the standard tests of the Vertical Sky Component(VSC) and No Sky Line (NSL) for daylight and Average Probably Sunlight Hours (APSH) for sunlight.
- 14.6 The VSC is calculated at the centre point of each affected window on the outside face of the wall in question. A window looking into an empty field will achieve a maximum value of 40%. BRE guidelines suggest that 27% VSC is a good level of daylight. If a window does not achieve 27% VSC as a result of the development, then it is assessed whether the reduction in value would be greater than 20% of the existing VSC – which is when the reduction in light would become noticeable to occupants. However, officers consider that VSCs lower than 27% are normal for urban areas, with 20% still considered acceptable. The NSL test measures the distribution of daylight at the working plane(horizontal 'desktop' plane 0.85m in height) within a room. A reduction of 0.8 times in the area of sky visibility at the working plane may be deemed noticeable, however this is dependent on room layouts.
- 14.7 The 27% VSC target set by the BRE is based upon a sub-urban type environment, in more urban areas where density levels are increased, these values may not be considered appropriate. The BRE guidelines provide that different targets may be used based on the special requirements of the proposed development or its location, these can include practices such as mirror massing which the applicant has used for Grangemill, further detail is provided below.

Grangemill(located to north)



- 14.8 This neighbouring building is the one most affected by the proposed development. When assessing the development using the standard VSC and NSL analysis without mirror massing 62 of the 79 windows would pass the BRE guidelines. Of the 17 that fail, 8 of these serve bedrooms which are not

the main habitable areas of units and it is accepted that there can sometimes be a fail to a bedroom. A further 8 would have a retained VSC of between 17.1% and 25.1% which can be acceptable in an urban environment. The last window at ground floor level, circled in the image above would experience a reduction from a VSC of 30.5% to 14.2% so a loss of 53.4%. This window would serve a Living/Kitchen/Dinner which is the main habitable area of the unit. When considering the NSL to this room it would see a reduction from 99.2% to 29.6% which is a significant loss of area within the room that would be able to see sky, 11sqm or a loss of 70%.

14.9 The applicant has adopted a mirror massing assessment to establish what an alternative target may be. So for the assessment of the impact on Grangemill a mirror massing assessment has also been undertaken this uses a mirror image building of the same height and size and equal distance from the other side of the boundary. The independent assessor has supported the principal of using this methodology, however the initial mirror massing study had some discrepancies so a further assessment was required which satisfied the BRE guidelines.

14.10 The revised mirror massing study shows that the proposed development would very largely be less impactful on Grangemill than a mirror image of itself. Where the impacts on Grangemill would be greater than a mirror-image massing, the retained values in the proposed condition are, by and large, greater than the BRE recommendations (i.e. $\geq 27\%$ VSC, $\geq 25\%$ APSH, $\geq 5\%$ APSH in winter). The principle of using a mirror massing study has been supported by the Councils independent assessor.

14.11 There are only a handful of instances where that would not be the case, which are as follows:

Daylight

- Ground floor living/kitchen/dining; the proposed massing would result in 19.8% loss relative to mirror massing, but the absolute loss would be quite small (3.5% VSC).
- First floor living/kitchen/dining; the proposed massing would result in 9.5% loss relative to mirror massing, but the absolute loss would be small (1.8% VSC).

Sunlight

- Ground floor living/kitchen/dining and two bedrooms; whilst the proposed development would be significantly less impactful on annual sunlight than a mirror-image massing, it would be more impactful on winter sunlight.
- Two first floor bedrooms; whilst the proposed development would be significantly less impactful on annual sunlight than a mirror-image massing, it would be very slightly more impactful on winter sunlight

14.12 In conclusion, it is acknowledged that there would be some harmful impact on the some of the flats in Grangemill in sunlight and daylight terms. The 'mirror massing' analysis has been undertaken by the applicant's daylight consultant, an approach endorsed by the Council's own independent daylight assessor. Mirror massing demonstrates that the impact would be within an

acceptable range given the expectation for built form in the immediate context. Officers have also to balance this harm against strategic objectives to maximise the developable potential of sites. The unusual low rise nature of the building would mean that any additional height on the site would have a likely impact on daylight and sunlight to Grangemill. On balance therefore the development is considered to be acceptable in this regard.

1-2 Ingestre Road (located to north west)

- 14.13 These neighbouring residents would not experience any loss of daylight or sunlight and meet the recommended guidelines set out in the BRE.

Fletcher Court (location to north east)



Daylight

- 14.14 An assessment was undertaken on 56 windows which serve 48 rooms. 51 of the windows would meet the VSC criteria. Of the five that do not, these would be minor losses, which would not be considered unreasonable for an urban area.

Sunlight

- 14.15 Two of the five windows which fail the VSC would also experience winter sunlight impacts but one would see a reasonable level of sunlight retained (4% APSH) and the other the absolute loss is very small (1%). Furthermore both of these windows would retain reasonable or excellent annual sunlight (19% and 32%).

- 14.16 In light of the above it is considered that the residents within Fletcher Court would continue to receive a sufficient level of light for this urban area.

Tideswell (located to south east)



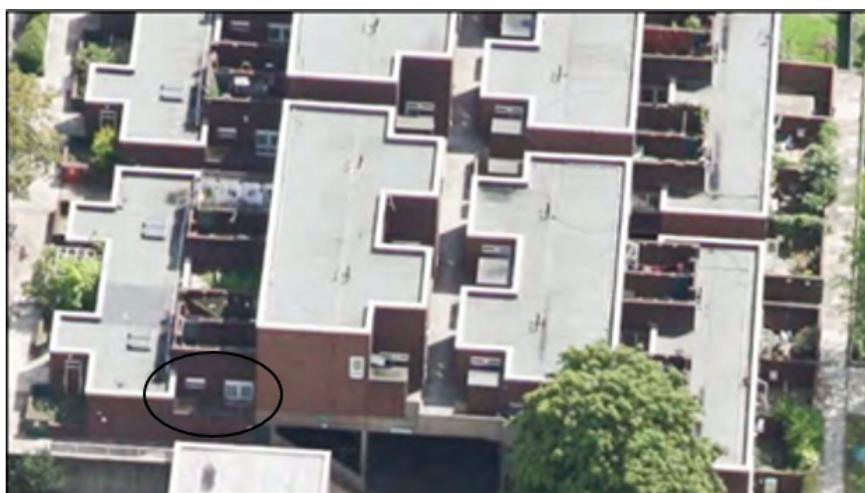
Daylight

- 14.17 37 windows serving 29 rooms were assessed. Four of the 37 windows failed the VSC test. Of these 4 windows, one would experience a minor loss of daylight and would be considered negligible, 28% as oppose to 20%. Another would experience a moderate loss of 34.4% however this window would retain a VSC of 24% which is considered reasonable, furthermore this window is the small window on the side elevation and is likely to serve a bathroom or hall given its size, circled on the left in the above image. The remaining two windows(circled in the right above), are located at ground floor level and experience large reductions in the VSC, the applicants daylight and sunlight report notes that these levels are exaggerated by the existing built form of Tidswell with projecting wings either side of the windows. The Councils independent assessor agrees with this view and considers the projecting wings are the relative factor in the relative light loss.

Sunlight

- 14.18 All windows will retain a sufficient level of sunlight with all windows tested passing the BRE criteria.

Hambrook Court (located to south west)



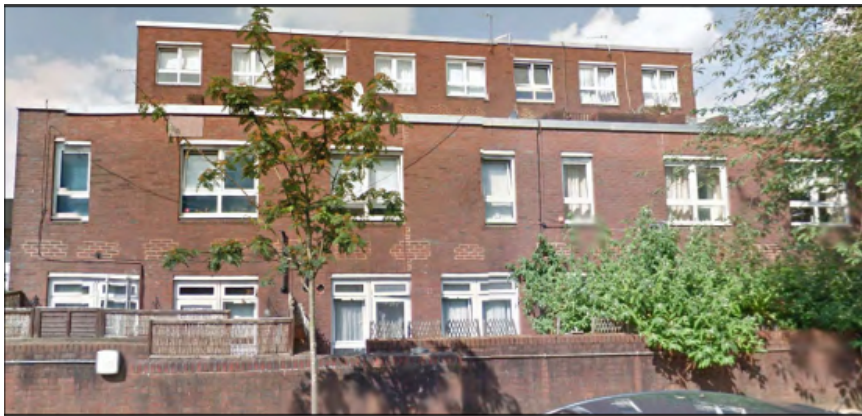
Daylight

- 14.19 25 of the 27 windows tested, which serve 21 rooms, pass the VSC criteria. Of the 2 windows that don't(circled above), they serve one room, it is not known what the rooms serves but it is likely to be a living room. The retained VSC values to this room would be 7% to 12% and a NSL value of 42%. The applicant's daylight and sunlight report notes that the projecting wings either side of the window limit the access to daylight and sky visibility. The Councils independent assessor agrees with this view that it would be the projecting wings either side of this room's two windows that are a factor in the relative light loss.

Sunlight

- 14.20 One window located to the ground floor is located within 90 degrees due south of the development and meets the BRE criteria.

Calver (located to the west)



Daylight

- 14.21 The assessment tested 24 rooms served by 32 windows. 19 of the 32 windows passed the VSC criteria. Of the remaining 19 windows which serve 10 rooms, the retained VSC values range between 17% to 26% and most of the NSL values would be 47% to 78%. These are considered reasonable for an urban area. The Councils independent consultant agrees with this conclusion.

Sunlight

- 14.22 No windows within this neighbour which face the proposed development are oriented within 90 degrees of due south and therefore do not require an assessment of sunlight impact.

Outlook

- 14.23 The Council's amenity CPG notes that outlook is the visual amenity enjoyed by occupants when looking out of their windows or from their garden. Development should ensure that the proximity, size or cumulative effect of any structures avoids having an overbearing and/or dominating effect that is detrimental to the enjoyment of their properties. It should be noted that the specific view from a property is not protected as this is not a material planning consideration.

14.24 With regard to the residents to the south within Hambrook and Tideswell blocks these properties are orientated perpendicular to the application site and therefore their main outlooks would be to the east and west directions. Therefore, the residents outlook would be largely unaffected by the development.

14.25 In terms of residents of Grangemill located to the north, the development would be of a higher scale than the existing building. It is considered that the relationship between the proposed development and the existing building would be similar to many situations where you have similarly scaled buildings opposite each other and whilst there would be some impact on the outlook experienced by residents of Grangemill it is not considered to be to the detriment of their amenity.



14.26 Also to the north but not directly opposite the proposed development is a terrace of 2 storey properties starting with No.1 Ingestre Road. Given the siting of the development in relation to these properties it is considered these residents would continue to experience a good level of outlook.

Noise and disturbance

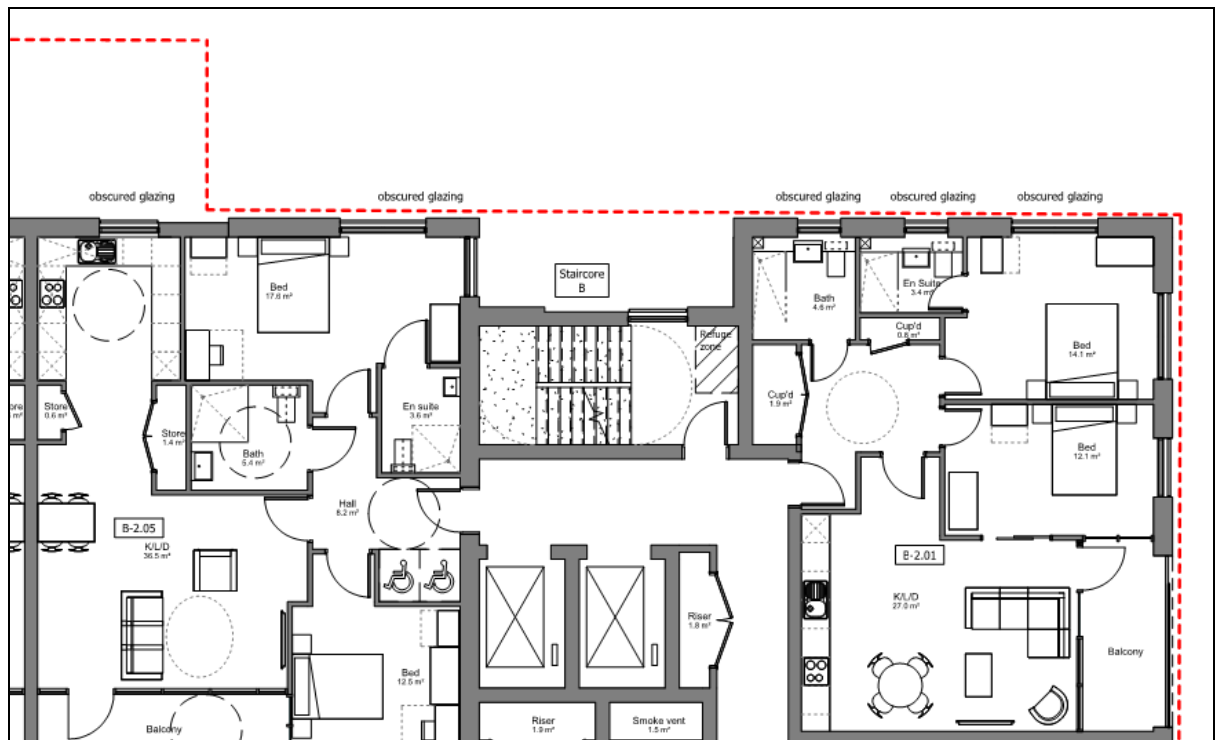
14.27 As noted above within the amenity of proposed housing section, a noise assessment report has been submitted in support of the application. The general operations of the building in terms of the proposed use it not considered to result in a significant increase in noise and disturbance to existing residents. Furthermore noise from collection and delivery activity would not adversely impact on the existing acoustic environment due to the relatively infrequent and limited activities.

14.28 The development includes plant positioned to the roof of the development for hot water heat pumps. Based on the environmental noise survey data maximum plant emission levels have been set in controlling fixed building services plant to an acceptable level. Noise limits apply at a position 1m from the façade of the nearest noise sensitive properties and include the total contribution of noise from all plant items associated with the proposed plant scheme that may run during any particular period.

- 14.29 Appropriate mitigation (e.g. screening, enclosure, directivity) will need to be incorporated into the final design. Specification of these systems shall ensure that noise levels are in line with the proposed building services plant noise limits included in the noise report. Subject to adequate mitigation measures, cumulative noise levels at new and existing sensitive receptors are expected to comply with the proposed plant noise limits. Conditions are recommended to ensure that mitigation measures are adequate.

Overlooking

- 14.30 The Council's Amenity CPG sets out that it is good practice to provide a minimum distance of 18m between the windows of habitable rooms in existing properties directly facing the proposed development.
- 14.31 The buildings to the west, 13-16 Calver, would be 20m from the proposed building and those to the east, 3-8 Fletcher Court would be 18m. The development would therefore meet the CPG recommendation in respect of these neighbouring residents.
- 14.32 With regard to the south the proposed building is between 5.5-9.8m from the flank elevations of 1 Tideswell and 25 Hambrook Court. However these flank elevations only contain high level windows with the main windows being perpendicular to the proposed building. Given the footprint of the proposed building in relation to these neighbouring buildings it is considered there would not be a detrimental impact on the privacy of these neighbouring residents.
- 14.33 In terms of the north, the development would be 12.6m from Grangemill. This is a similar distance as the existing care home building and Grangemill, albeit the proposed building would be taller. The scheme has been designed to minimise opportunities of the future occupiers to overlook the existing residents. All windows to this elevation would be obscure glazed to minimise opportunities for overlooking. Furthermore habitable accommodation in the new building would not overlook habitable accommodation of existing residents. Of the units located opposite Grangemill the windows on this elevation would serve bathrooms, en-suites and bedrooms. The image below shows the 2 units closest to Grangemill. In light of the measures employed within the design of the building, it is considered the development would not have a detrimental impact on the amenity enjoyed by the residents within Grangemill in terms of privacy and overlooking.



15 Land contamination

15.1 The site is identified as being a site that has contaminated sites potential. It has no historical industrial use, as noted above it was used to be a care home. It is therefore considered low risk of having the potential to cause ground contamination. The applicant has undergone borehole testing onsite and found that the made ground beneath the soft landscaped areas were significantly below the assessment criteria for residential end use. However given the development includes works of excavation under the existing hard standing on site a detailed scheme of assessment to assess the scale and nature of potential contamination risks on the site, a site investigation in line with the scheme of assessment and the submission of remediation scheme and modifications to the mediation scheme (if necessary).

16 Basement impact

16.1 Policy A5 (Basements) states that the Council will only permit basement development where it is demonstrated that it will not cause harm, structurally, in amenity terms, environmentally or in conservation/design terms.

16.2 The proposed development would have a single level basement that would sit beneath the footprint of the proposed building and would only be expressed with a lightwell (1.6m by 9.5m) to the south western corner of the building. The basement would have an area of 1,433sqm. Due to the topography of the site the excavation will be between 2.4m to 3.3m below the nearest ground level. The basement would accommodate 8 disabled parking spaces, residents gym, 64 cycle spaces (14 for staff and 50 for residents), 12 scooter spaces, plant rooms, laundry rooms, refuse stores and staff facilities.

16.3 The application was accompanied by a Basement Impact Assessment (BIA). The independent review by the Council's basement consultant (Campbell Reith) concluded that the BIA is adequate and in accordance with Policy A5 and guidance contained in Basements CPG, subject to the completion of a Basement Construction Plan (BCP), which is required by S106. The applicant has satisfactorily demonstrated that the proposed basement would not cause harm to the built and natural environment and would not result in flooding or ground instability.

17 Air quality

17.1 Camden Local Plan policy CC4 is relevant with regards to air quality.

17.2 An Air Quality Assessment (AQA) has been submitted as part of this application. The site is not in an area of particularly poor air quality and the plans are for the development to use Air Source Heat Pumps for heating and hot water. As such there will be no combustion of fossil fuels for heating. The emissions from the development are less than the benchmarked emissions and therefore the development meets the requirement to be at least air quality neutral. The site has the potential for medium impact from dust soiling during demolition and construction. Suitable mitigation measures are set out and conditions are recommended to ensure that the mitigation is secured within the Construction Management Plan and that air quality monitoring is implemented on site to safeguard the amenity of neighbouring properties. The Construction Management Plan will be secured as part of the Section 106 legal agreement. The development would therefore accord with Policy CC4.

18 Sustainable design and construction

18.1 The sustainable design and construction considerations are as follows:

- Policy review
- The site and the proposal
- Energy
- Sustainability
- Living roofs/walls

Policy review

18.2 The Council aims to tackle the causes of climate change in the borough by ensuring developments use less energy and through the use of decentralised energy and renewable energy technologies. Policy CC1 requires all development to minimise the effects of climate change and encourages all developments to meet the highest feasible environmental standards. It requires all developments to achieve a 20% reduction in CO2 emissions through renewable technologies (the 3rd stage of the energy hierarchy) wherever feasible. Policy CC2 requires development to be resilient to climate change by adopting climate change adaptation measures.

18.3 Policy 5.2 of the London plan requires development to be designed in accordance with the energy hierarchy: be lean (use less energy), be clean (supply energy efficiently), be green (use renewable energy). In addition chapter 5 of the London Plan sets out the need for schemes to:

- Target zero carbon for the residential part of the development, with a minimum of 35% reduction in regulated CO2 emissions below the maximum threshold allowed under Part L 2013 achieved on site and any remainder offset.
- Secure a minimum 35% reduction in regulated CO2 emissions below the maximum threshold allowed under Part L 2013.

18.4 Where the London Plan carbon reduction target cannot be met on-site policy allows for a carbon-offset financial contribution which will be used to secure the delivery of carbon reduction measures elsewhere in the borough.

18.5 Developments are also expected to implement the sustainable design principles as noted in policy CC2 by

- Demonstrating that the residential development can achieve a maximum internal water use of 105 litres per day.
- Achieve a BREEAM 'Excellent' rating and minimum credit requirements under Energy (60%), Materials (40%) and Water (60%).

The site and the proposal

18.6 The proposal is a high density scheme with good to excellent access to public transport links. The scheme is predominantly residential with some commercial units to the ground floor. The principle of the scheme is therefore highly sustainable.

Energy

Carbon Reduction(Be Lean)

18.7 With regard to CO2 reductions, modelling for CO2 reduction has been undertaken for each individual use of the residential and commercial. The commercial use would meet the 35% carbon reduction. The residential would make a 65.8% reduction in CO2 emissions. As the Council is targeting 100% there would be a shortfall of 34.2%. It is therefore considered necessary to secure a payment to offset this shortfall. When calculated using the formula set by the CPG this equates to £33,786. Such a payment will be secured via a Section 106 legal agreement. As the proposals include passive design measures such as Air Source Heat Pumps and Solar PV which align with the Councils sustainability policies the shortfall is considered acceptable.

Connection to existing Decentralised Energy Network (DEN), ASHP and CHP (Be clean)

18.8 In terms of a DEN, the site is not located within immediate proximity to an existing or potential network. The nearest existing network is Gospel Oak and the nearest proposed is Kentish Town area. Given the sites location it is not proposing to connecting to the existing DEN in Gospel Oak and this is considered acceptable. However the plant room in the basement will be

futureproofed to enable connection into a DEN as and when a suitable one in proximity to the development becomes available.

- 18.9 The development is not proposing any on-site CHP, there would be the provision of Air Source Heat Pumps(ASHP) which is supported by policy CC1.

Renewables (Be green)

- 18.10 The applicant is required to achieve a 20% of their carbon reduction via renewable energy. The development is proposing the use of ASHP and PV panels. Sitewide the development would be providing a 46.5% reduction via renewables which is supported. Full details of the PV panels will be secured via condition.

Circular Economy

- 18.11 Policy S17 of the draft London Plan, 'Reducing waste and supporting the circular economy', outlines that referable applications should promote circular economy outcomes by maximising materials re-use and minimising waste.

- 18.12 Within the applicants Sustainability Statement they note that a high proportion of the waste that is produced will be diverted from landfill through either, re-use on site or other sites, salvaged/reclaimed for re-use, returned to the suppliers via 'take back schemes' or recovered and recycled using an approved waste management contractor.

- 18.13 A condition is recommended to secure further detail of reuse and restoration strategy prior to the commencement of demolition. It will ensure that the materials are reused in accordance with circular economy principles and to ensure that the land is cleared and left in a reasonable state to retain the visual amenity of the area.

Sustainability

- 18.14 For residential buildings there is a requirement to achieve a BREEAM excellent rating, the applicant has provided a pre-assessment which confirms it is targeting Excellent.

- 18.15 To ensure the credits are met to achieve the Excellent ratings a design stage with pre-assessment checker and post-assessment BREEAM reports shall be secured via Section 106 legal agreement.

Cooling

- 18.16 In accordance with policy CC2 all development should demonstrate that measures to adapt to climate change have been implemented and that overheating risk has been managed including application of the cooling hierarchy. The cooling hierarchy is noted within paragraph 8.43 of the Camden Local Plan and includes 6 steps, which puts a preference on passive ventilation, mechanical ventilation (eg. Ceiling fans) and then active cooling (eg. Air conditioning). The supporting text to the policy also notes that active cooling will only be permitted where dynamic thermal modelling demonstrate

there is a clear need for it after all of the preferred measures are incorporated in line with the cooling hierarchy.

18.17 The new building has been designed in a manner to provide a balance of thermal control. The internal layout and glazing of the building has been designed to respond to the local climate and annual sun path with the aim of reducing energy demands and improving occupant comfort through the use of heat and light from the sun.

18.18 With regard to overheating an analysis of overheating has been undertaken for habitable areas of the development and concluded that all kitchens, living rooms and bedrooms would not overheat. The risk of overheating has been reduced through the inclusion of balconies which provide some shading together with openable windows to maximise ventilation of rooms. There would be overheating to some of the non-domestic areas of the development such as a fitness room and gym therefore comfort cooling is proposed here. As this would be used only intermittently when required it is considered acceptable.

19 Flood risk and drainage

19.1 Camden Local Plan policy CC3 is relevant with regards to flood risk and drainage and seeks to ensure development does not increase flood risk and reduces the risk of flooding where possible.

19.2 Thames Water has been consulted and has no objections subject to conditions as noted within the consultation response section.

19.3 A Flood Risk Assessment has been submitted as part of this application. This document states that the site is located within Flood Zone 1 with a low risk of flooding. The development includes a Sustainable Urban Drainage System (SUDS) in order to reduce run-off rates from the pre-development rates. The applicant has provided details to demonstrate that the development will provide a total of 152m³ of attenuation which will be able to accommodate some of the exceedance flows across the site. Details of the SUDS will be secured via condition.

20 Nature conservation and biodiversity

20.1 Policy A3 seeks to enhance biodiversity within the Borough. The site itself is not within a designated nature conservation area. The application is supported by an Ecological Appraisal which identifies that the site is of limited value to biodiversity. The Ecology appraisal identifies some enhancements that could be achieved regarding biodiversity. These include the use of green/brown roofs, native planting, living walls and bird and bat boxes. However a limited detail of these have been provided within the application.

20.2 With regard to the planting that would surround the development, to ensure these would enhance the biodiversity of the area, a condition of the type of planting to be included is recommended. Furthermore, it is considered the

building has a great opportunity for the inclusion of a well-designed biodiverse green roof which could be incorporated with the plant and PVs. Such a roof is implied within the Design and Access statement but no detail has been provided. Therefore details shall be secured via condition and implemented prior to occupation of the building. In respect of a living wall, a condition seeking details of a feasibility study for a green wall and its implemented is recommended.

20.3 The proposals do not include the inclusion of bird or bat nest boxes of bricks which could easily be integrated into the building. It is considered necessary to secure details of bird and bat boxes and bricks to be installed at the building to enhance opportunities for biodiversity.

20.4 In light of the above, with the relevant enhancement measures it is considered that the development would accord with the objectives of Policy A3.

21 Accessibility

21.1 Policy C6 seeks to ensure fair access and remove the barriers that prevent everyone from accessing facilities and opportunities. The policy sets out the Council's expectations to maximise their accessibility.

21.2 As this is new build 90% will need to meet M4(2) and 10% M4(3). The development is providing 89% M4(2) and 11% M4(3). As M4(3) are the adapted units the provision of 11% is welcomed. M4(2) and M4(3) will be conditioned to ensure their delivery.

21.3 The building would be provided with level access from the street level. In terms of internal spaces, corridors have been designed to be sufficiently sized with a clear layout. In terms of detailed design the development will included measures such as entrances to residential units being clearly defined, handrails will be provided, provision of informal seating spaces and the installation of ambulant stairs.

21.4 The development has been designed with the principles of lifetime neighbourhoods, the government initiative to ensure places allow people to live fulfilling and independent lives as they grow older. As noted in paragraph 4.104 of the Local Plan the elements most relevant to planning are providing homes to meet people's needs, ensuring development promotes sustainable travel, protects vitality and viability of town centres and shopping areas and protects community facilities.

21.5 The application is accompanied with a Travel Plan which sets out how use of sustainable and healthy travel modes such as walking and cycling will be encouraged at the development. It also seeks to minimise the use of travel modes that have the highest environmental impact where others are available.

21.6 In terms of impact on town centres and shopping areas, the development would bring additional footfall to the surrounding area which would positively contribute to the local shopping areas. Neither would the development impact

on local community facilities. The development has been designed with improved links to the local community centre which would enable integration of the existing community and the future community that this development would bring. Furthermore the offer of gym membership for non residents over the age of 55 will enable people within the local community the opportunity to utilise the development and integrate with future residents.

- 21.7 In light of the above, it is considered the development has been designed with accessibility in mind which is fundamental given the intended end users of the development. It is considered the development would accord with the objectives of Policy C6.

22 Transport

- 22.1 The following transport considerations are covered below:

- Policy review
- The site
- Trip generation
- Travel plan
- Cycle and scooter parking
- Car parking
- Construction management
- Deliveries and servicing
- Highways Contribution and Public Realm Improvements
- Approval in Principle
- Conclusion

Policy review

- 22.2 Camden Local Plan policies T1, T2, T3 and T4 and CPG7 (Transport) are relevant with regards to transport issues.

The Site

- 22.3 The TfL PTAL calculator indicates that the site has a PTAL score of between 3 and 4 based on the site's postcode or street address. These calculations are based on the map centre for each 100sqm block, so are somewhat approximate in their nature. However, the Transport Statement submitted in support of the application states that TfL's PTAL calculation ignores all bus services on Highgate Road (which it does) as it does not recognise the pedestrian route to the site via Little Green Street. The applicant's consultant has therefore recalculated the score to include this route which gives the site a score of 6a. This has been reviewed by the Council's Transport officer who raised no objection to the adoption of a PTAL of 6a, meaning the site has excellent access to public transport.

Trip Generation

- 22.4 The Transport Statement has used the TRICS database to derive the number of peak hour and total trips of the site based upon a traditional care home use. The same trip rates have been used for both the previous 48 bed care home (which ceased use in 2013) and the proposed 107 bed (50 unit) assisted living development. A summary is provided below.

Person Trips	AM Peak			PM Peak			12 Hour Total		
	Arrivals	Departures	Total	Arrivals	Departures	Total	Arrivals	Departures	Total
Existing	6	4	10	6	7	13	62	62	124
Proposed	12	14	26	11	17	28	137	139	176

22.5 The figures above indicate that the proposed development would lead to a modest increase in the number of trips associated with the site and as such it is anticipated that they would have no significant impact on the operation of the local public transport network or the local highway network.

Travel Plan

22.6 A draft Travel Plan has been submitted in support of the planning application. This is welcomed as it demonstrates a commitment to encouraging and promoting trips by sustainable modes of transport. A residential travel plan and associated monitoring fee of £4,881 would be secured as section 106 planning obligations if planning permission were granted. The Travel Plan would be targeted towards residential occupiers and staff. The location of the site with good to excellent connections to the public transport network would help to reduce the need to travel by single occupancy private car and would encourage residents and staff to make walking, cycling and travel by public transport the natural choice for day-to-day trips.

Cycle Parking and Scooter Parking

22.7 In respect of parking for staff, there is a separate cycle store at basement providing 7 Sheffield Stands, equating to 14 spaces. Staff change facilities have also been provided at basement levels. 2 of these spaces would be required to be accessible for the commercial units. Although this is not being considered as a care home, to consider the requirement for staff cycle spaces, the requirement for care homes has been adopted. This is 1 space per 5 staff. The applicant has noted there will be 14 staff present at the site, resulting in the need for 3 spaces. Therefore the applicant is providing additional space for staff cycles which is welcomed.

22.8 For residents, a cycle store has been provided at ground floor level to accommodate 4 cycles and 4 scooters, likely mobility scooters. Then in the basement level there is the provision of 25 Sheffield Stands within an area of 110.7sqm, thereby providing 50 spaces for standard cycles. Given the size of the room, it is considered there would be scope for including some non-standard spaces, however in terms of access, these would be better located at ground floor level. It is therefore recommended that a condition is used to secure the provision of at least 5% of non-standard spaces at ground floor level.

22.9 At basement level there is provision of a scooter storage room for 12 scooters which will be equipped with charging points.

- 22.10 The basement level cycle and scooter parking would be accessible via 2 lifts where people could then choose to exit the building via the ground floor cycle store or via the main reception area.

Car Parking

- 22.11 Policy T2 notes that the Council will limit the availability of parking and limit on-site parking to spaces designated for disabled people where necessary. When originally submitted the application sought approval of 10 car parking spaces, 8 of which would be disabled and 2 as general parking spaces. Officers have negotiated the removal of the 2 general parking spaces which have been designed out of the basement area. Given the end users are over 55s it is considered that 8 accessible space would be required for a development of this scale. A Section 106 legal agreement will be used to secure the development as car capped for 8 on site spaces for disabled users only and all units within the development shall be car free, secured via the Section 106 legal agreement. Should the end users change and the accommodate reverts to standard C3 that is not age specific they the level of accessible space will need to be reviewed and the space repurposed for another use which could include additional cycle parking, storage or larger gym area. This can be secured as part of the Section 106 legal agreement.

- 22.12 In line with Policy T6.1C of the Intend to Publish version of the London Plan (December 2019), at least 20% of the proposed parking spaces should be fitted with Electric Vehicle Charging Points (active charging facilities), with passive provision for all of the remaining spaces. This will be secured by Condition.

Construction Management

- 22.13 Construction Management Plans (CMPs) are used to demonstrate how developments will minimise impacts from the movement of goods and materials during the construction process (including any demolition works). A draft CMP using the Council's CMP pro-forma has been submitted in support of the planning application. However, the document lacks detail as a principal contractor has yet to be appointed.

- 22.14 The Council's primary concern is public safety but subsequently ensuring that construction traffic does not create (or add to existing) traffic congestion in the local area. The proposal may lead to a variety of amenity issues for local people (e.g. noise, vibration, air quality, temporary loss of parking, etc.) during the construction phase. The Council needs to ensure that the development can be implemented without being detrimental to amenity or the safe and efficient operation of the highway network in the local area. A far more detailed CMP would therefore be secured via a Section 106 planning obligation if planning permission is granted.

- 22.15 The Council would expect construction vehicle movements to and from the site to be scheduled to avoid peak periods to minimise the impacts of construction on the transport network. The contractor would need to register the works with the Considerate Constructors' Scheme. The contractor would also need to adhere to the CLOCS standard.

22.16 The development, if approved, would require significant input from officers. This would relate to the development and assessment of the CMP as well as ongoing monitoring and enforcement of the CMP during demolition and construction. A CMP implementation support contribution of £22,816 would be secured via a Section 106 planning obligation if planning permission were granted. The obligation would also secure a bond of £15,000 in the event of any additional work required to enforce or resolve breaches of a CMP.

22.17 Given the nature of the development within close proximity to residents it is considered necessary to secure a Community Working Group during the construction phase. This will ensure local residents are kept up to date during the construction phase of the development. Such a group will be secured via the Section 106 legal agreement.

Deliveries and Servicing

22.18 A Delivery and Servicing Management Plan (DSMP) has been submitted in support of the proposed development. This states that there will be weekly deliveries to the laundry, gym and salon, and daily deliveries to the café, bar and kitchen. Whilst it makes no specific reference to deliveries to the individual residential units, these are unlikely to be significant. It is assumed that most servicing will take place from the street and the proposals as shown on the Illustrative Masterplan to include the provision of an on-street loading bay/pick-up and drop-off area on the west side of the building. However, as the main entrance to the development is located on the north side of the building it would make more sense to locate the proposed on-street loading bay directly outside this. This issue will be reviewed as the Illustrative Masterplan and Hard Landscaping proposals are further developed. The DSMP states that some servicing via cars and smaller vans could also take place from within the basement via the car lift.

22.19 Refuse will be collected on-street from the eastern side of the building, adjacent to the basement car lift. Refuse will be brought up from the underground storage areas by the on-site team and temporarily stored on the footway prior to collection. Whilst not ideal, this type of arrangement is not uncommon at other locations within the Borough. At present bins are stored on the footway along the north eastern edge of the site.

22.20 The DSMP should be secured via the Section 106 Agreement as the arrangements may well change given that the Masterplan is only illustrative at present and may be subject to further refinement once an operator of the development has been confirmed and the public realm improvements agreed.

Highways Contribution and Public Realm Improvements

22.21 The transport design team have been consulted on the proposals, the land is located within a Council housing estate and the roads are maintained by the Councils Highways Maintenance team. To mitigate any impact of the works on the roads that surround the development site, a contribution of £125,934 is to be secured via a Section 106 legal agreement.

- 22.22 An additional contribution will be required to secure the level of improvements portrayed in the Illustrative Masterplan. Whilst it is difficult to put a precise figure on this level of contribution without undertaking a further detailed cost estimate, it is anticipated that a combined highways and public realm contribution of £200,000 would be sufficient to cover all of the costs. Any monies unspent would be returned to the developer with a clause to this effect specifically included in the wording of the Section 106 Agreement.

Approval in Principle

- 22.23 The proposed basement extends to close to the edge of the Council's Housing land ownership on all four sides and so it will be necessary to secure a Section 106 Contribution of (4 x £1,800 =) £7,200 in order for the Approval in Principle of the design to be assessed by the Council's Engineering bridges and structures teams. This will help ensure that the structural integrity of the adjacent footways and carriageways is maintained throughout the construction process.

Conclusion

- 22.24 The proposal would be acceptable in terms of transport implications subject to the relevant conditions and Section 106 obligations noted above.

23 Safety and security

- 23.1 Camden Local Plan policy C5 (safety and security) and CPG1 (Design) are relevant with regards to secure by design.
- 23.2 The scheme incorporates design principles which include increased natural surveillance to adjacent streets and green spaces and continuous building lines to remove hidden spaces from public realm and improve visibility of pedestrian link to the community centre. The development would also have restricted fob access to prevent unauthorised access. The scheme would also incorporate secure windows and doors.
- 23.3 The Designing Out Crime officer was consulted prior to the application being submitted and was involved in the design process and have reviewed the currently proposals raising no objections. It is considered the development would accord with Policy C5.

24 Refuse and recycling

- 24.1 Camden Local Plan policy CC5 (Waste) and Camden Planning Guidance 1 (Design) are relevant with regards to waste and recycling storage and seek to ensure that appropriate storage for waste and recyclables is provided in all developments.
- 24.2 Bin stores for commercial and residential uses are located within the basement area. Residents will be able to take their waste to the bins stores via the circulation cores. A management plan will be secured via condition which will outline the arrangement of moving waste from the storage room to

grade level via the car lift for collection within 10m from the site. A Servicing Management Plan will be secured via Section 106 legal agreement.

25 Employment and training opportunities

25.1 The proposed development is large enough to generate local economic benefits. Camden Local Plan policies E1 and E2 and Camden Planning Guidance state that in the case of such developments the Council will seek to secure employment and training opportunities for local residents and opportunities for businesses based in the Borough to secure contracts to provide goods and services.

25.2 In line with the Council's Employment Sites & Business Premises CPG, a range of training and employment benefits are to be secured in order to provide opportunities during and after the construction phase for local residents and businesses. This package of recruitment, apprenticeship and procurement measures will be secured via S106. The obligations will comprise of construction phase and end user phase obligations, as noted below:

Construction Phase

- The applicant should work to CITB benchmarks for local employment when recruiting for construction-related jobs as per section 68 of the Employment sites and business premises CPG.
- The applicant should advertise all construction vacancies and work placement opportunities exclusively with the King's Cross Construction Skills Centre for a period of 1 week before marketing more widely.
- The applicant should provide a specified number (to be agreed) of construction work placement opportunities of not less than 2 weeks each, to be undertaken over the course of the development, to be recruited through the Council's King's Cross Construction Skills Centre, as per section 70 of the Employment sites and business premises CPG
- If the build costs of the scheme exceed £3 million the applicant must recruit 1 construction apprentice per £3million of build costs and pay the council a support fee of £1,700 per apprentice as per section 65 of the Employment sites and business premises CPG. Recruitment of construction apprentices should be conducted through the Council's King's Cross Construction Skills Centre. Recruitment of non-construction apprentices should be conducted through the Council's Economic Development team.
- If the value of the scheme exceeds £1 million, the applicant must also sign up to the Camden Local Procurement Code, as per section 71 of the Employment sites and business premises CPG; and
- The applicant provide a local employment, skills and local supply plan setting out their plan for delivering the above requirements in advance of commencing on site, as per section 63 of the Employment sites and business premises CPG.

End User Phase

- We would request provision of end use apprenticeships. The apprenticeships could be within a range of roles (examples include hospitality, business administration, finance, customer service, IT); and
- The applicant should provide a specified number (to be agreed) of end use work placement opportunities of not less than 2 weeks each, to be recruited through the Council's Economic Development team, as per section 70 of the Employment sites and business premises CPG

25.3 The proposals are therefore in accordance with the guidance set out in CPG5 and policies E1 and E2 of the Camden Local Plan.

26 Planning obligations

26.1 The following contributions are required to mitigate the impact of the development upon the local area, including on local services. These heads of terms will mitigate any impact of the proposal on the infrastructure of the area.

Contribution	Amount (£)
Public Realm Improvements	£200,000
Highways	£125,934
Approval in Principle	£7,200
Travel plan monitoring	£4,881
Payment in Lieu of affordable housing	£1 million
CMP Monitoring	£22,816
CMP Bond	£15,000
Carbon offset payment	£33,786
TOTAL	£1,409,617

27 Mayor of London's Crossrail CIL

27.1 The proposal will be liable for the Mayor of London's Community Infrastructure Levy (CIL) as it includes the addition of private residential units. Based on the Mayor's CIL charging schedule and the information provided as part of the application, the Mayoral CIL is based at £50 per sqm. It would therefore equate to £404,250 (8085 x 50). This would be collected by Camden after the scheme is implemented and could be subject to surcharges for failure to assume liability, submit a commencement notice and late payment, and subject to indexation in line with the construction costs index.

28 Camden CIL

28.1 The proposal would be liable for the Camden Community Infrastructure Levy (CIL). The site is located within Zone C. The estimate based on the uplift of floorspace and the proportion of market housing and commercial floorspace proposed, the Camden CIL liability is **£3,877,437.50**. This is based on a floor area of 7737.5sqm for the residential element at a rate of £500 per square metre equating to £3,868,750. The commercial elements of the café/restaurant, hairdressers and gym which would all be publically accessible would result in a CIL of £8,687.50, based on a floor area of 347.5sqm charged at a rate of £25 per sqm.

29 Conclusion

- 29.1 It is considered this development would bring a new life within this existing housing estate which could contribute to a mixed and balanced community. The proposed development has the opportunity to benefit the local residents with access to the on site commercial units and gym if over 55. The proposed development would develop a site that has laid vacant for some time now and put it to worthwhile use. The design of the development has progressed through negotiations with officers and the Council's Design Review Panel to come to a proposal which is considered to integrate well with the surrounding urban grain to ensure it forms part of the existing community.
- 29.2 It is considered that the development would bring forward a package of improvements to the public realm in the local community such as repaving of roads, additional lighting and widening and replacement of steps leading from Ingestre Road to the community centre, thereby improving the communities access to this existing local community facility.
- 29.3 Officers consider this will be a high quality development which will utilise a vacant site. All planning considerations have been given their due weight and it is considered the benefits of the proposal outweigh any perceived harm. It is therefore recommended for approval subject to conditions and Section 106 Legal Agreement.

30 LEGAL COMMENTS

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

31 RECOMMENDATIONS

- 31.1 **Planning Permission is recommended subject to conditions and a Section 106 Legal Agreement covering the following Heads of Terms:-**

Affordable housing

- A payment in lieu of affordable housing of £1 million, paid on implementation of the development.
- The S106 legal agreement to exclude the ability of the developer / operator to charge an event fee; and
- Outturn viability review wherein any surplus is offered to the Council as a payment in lieu, and any surplus in excess of that identified by BPS is split between Council and applicant.

Basement

- Basement Construction Plan (BCP)

Community facilities

- Gym to be made publically accessible for those over 55 years of age

Employment and training

- The applicant should work to CITB benchmarks for local employment when recruiting for construction-related jobs as per section 68 of the Employment sites and business premises CPG.
- The applicant should advertise all construction vacancies and work placement opportunities exclusively with the King's Cross Construction Skills Centre for a period of 1 week before marketing more widely.
- The applicant should provide a specified number (to be agreed) of construction work placement opportunities of not less than 2 weeks each, to be undertaken over the course of the development, to be recruited through the Council's King's Cross Construction Skills Centre, as per section 70 of the Employment sites and business premises CPG
- If the build costs of the scheme exceed £3 million the applicant must recruit 1 construction apprentice per £3million of build costs and pay the council a support fee of £1,700 per apprentice as per section 65 of the Employment sites and business premises CPG. Recruitment of construction apprentices should be conducted through the Council's King's Cross Construction Skills Centre. Recruitment of non-construction apprentices should be conducted through the Council's Economic Development team.
- If the value of the scheme exceeds £1 million, the applicant must also sign up to the Camden Local Procurement Code, as per section 71 of the Employment sites and business premises CPG; and
- The applicant provide a local employment, skills and local supply plan setting out their plan for delivering the above requirements in advance of commencing on site, as per section 63 of the Employment sites and business premises CPG.
- We would request provision of end use apprenticeships. The apprenticeships could be within a range of roles (examples include hospitality, business administration, finance, customer service, IT); and
- The applicant should provide a specified number (to be agreed) of end use work placement opportunities of not less than 2 weeks each, to be recruited through the Council's Economic Development team, as per section 70 of the Employment sites and business premises CPG

Energy and sustainability

- BREAM Excellent compliance and post construction review, targets as stated in the energy and sustainability statements for Energy, Materials and Water
- Energy measures including on-site renewables
- Energy provisions to be secured through Energy Efficiency & Renewable Energy Plan
- Carbon off-set payment £33,786

Landscaping, trees and open space

- Completion of public realm works in consultation with the Council

Transport

- Car free housing

- Car capped for 8 disabled spaces
- Construction Management Plan (CMP), associated monitoring fee, bond and associated requirement for a Construction Working Group to be formed prior to commencement.
- Delivery and Servicing Management Plan (DSMP)
- Financial contribution for highway works directly adjacent to the site.
- Level Plans are required to be submitted showing the interaction between the development thresholds and the Public Highway to be submitted to and approved by the Highway Authority prior to any works starting on-site. The Highway Authority reserves the right to construct the adjoining Public Highway (carriageway, footway and/or verge) to levels it considers appropriate.
- Residential Travel Plan and monitoring fee of £4,881
- Approval in Principle (AIP) report for all elevations of the site where a basement is adjacent to the public highway

32 Conditions – planning application

1	<p>Three years from the date of this permission</p> <p>This development must be begun not later than three years from the date of this permission.</p> <p>Reason: In order to comply with the provisions of Section 92 of the Town and Country Planning Act 1990 (as amended).</p>
2	<p>Approved drawings</p> <p>The development hereby permitted shall be carried out in accordance with the following approved plans:</p> <ul style="list-style-type: none"> • 27463-A-E11-01 rev D, 27463-A-E11-02, 27463-A-E11-03, 27463-A-E11-04, 27463-A-E11-05 and 27463-A-E13-01, 27463-A-D11-01, 27463-A-D11-02, 27463-A-D11-03, 27463-A-D11-04, 27463-A-D13-01, 27463-A-P11-00 Rev F, 27463-A-P11-01 Rev F, 27463-A-P11-02 Rev D, 27463-A-P11-03 Rev D, 27463-A-P11-04 Rev C, 27463-A-P11-05 Rev C, 27463-A-P11-06 Rev C, 27463-A-P11-07 Rev C, 27463-A-P11-10 Rev C, 27463-A-P11-11 Rev B, 27463-A-P11-20 Rev B, 27463-A-P12-01 Rev B, 27463-A-P12-02 Rev D, 27463-A-P13-01 Rev D, 27463-A-P13-02 Rev D, 27463-A-P13-03 Rev C, 27463-A-P13-04 Rev D, RG-L-04-1 Rev A, RG-L-04-2 Rev A, RG-L-04-3 Rev A and RG-L-05-1, RG-L-05-2 <p>Reason: For the avoidance of doubt and in the interest of proper planning.</p>
3	<p>Detailed drawings/samples</p> <p>Detailed drawings, or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the Council before the relevant part of the work is begun:</p> <p>a) Plan, elevation and section drawings, including jambs, head and cill, of all external windows and doors at a scale of 1:10.</p>

	<p>b) Samples and manufacturer's details at a scale of 1:10, of all facing materials including windows and door frames, glazing, and brickwork with a full scale sample panel of brickwork, spandrel panel and glazing elements of no less than 1m by 1m including junction window opening demonstrating the proposed colour, texture, face-bond and pointing.</p> <p>A sample panel of all facing materials should be erected on-site and approved by the Council before the relevant parts of the work are commenced and the development shall be carried out in accordance with the approval given.</p> <p>The relevant part of the works shall then be carried in accordance with the approved details</p> <p>Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy D1 of the Camden Local Plan.</p>
4	<p>External fixtures</p> <p>No lights, meter boxes, flues, vents or pipes, and no telecommunications equipment, alarm boxes, television aerials or satellite dishes shall be fixed or installed on the external face of the buildings, without the prior approval in writing of the Council.</p> <p>Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy D1 of the Camden Local Plan.</p>
5	<p>Refuse and recycling</p> <p>Prior to first occupation of the residential units a waste management plan shall be submitted to and approved in writing by the Local Planning Authority. Such a plan shall include details for the arrangement of moving waste from the storage room to grade level to the pick up point. The development shall not be implemented other than in accordance with such measures as approved. All such measures shall be in place prior to the first occupation of any residential units and shall be retained thereafter.</p> <p>Reason: To safeguard the amenities of the future occupiers and adjoining neighbours in accordance with the requirements of policy CC5 of the Camden Local Plan.</p>
6	<p>Roof terraces</p> <p>No flat roofs within the development shall be used as terraces unless marked as such on the hereby approved plans, without the prior express approval in writing of the Local Planning Authority.</p> <p>Reason: To safeguard the amenities of the future occupiers and adjoining neighbours in accordance with the requirements of policy A1 of the Camden Local Plan.</p>
7	<p>Landscape</p> <p>No development shall take place on the relevant part of the site within the ownership of the applicant until full details of hard and soft landscaping and means of enclosure of all un-built, open areas have been submitted to and approved by the local planning</p>

	<p>authority in writing. Such details shall include:</p> <ul style="list-style-type: none"> a) details of any proposed earthworks including grading, mounding and other changes in ground levels. b) details of proposals for the enhancement of biodiversity, c) an open space management plan, <p>The relevant part of the works shall not be carried out otherwise than in accordance with the details thus approved.</p> <p>Reason: To ensure that the development achieves a high quality of landscaping which contributes to the visual amenity and character of the area in accordance with the requirements of policies A1,D1 and A2 of the Camden Local Plan.</p>
8	<p>Hours of use: <u>Retail use</u></p> <p>The retail units hereby approved shall operate within the hours of <u>0800 to 2200 Monday to Saturday and 0900 to 2100 on Sundays and Bank Holidays.</u></p> <p>Reason: To ensure that the amenity of occupiers of residential properties in the area is not adversely affected by noise and disturbance in accordance with Policy A1 of the Camden Local Plan</p>
9	<p>Obscure glazing</p> <p>All windows shown on the hereby approved plans as obscure glazed shall be installed as such prior to the occupation of the any residential units.</p> <p>Reason: To ensure that the amenity of occupiers of neighbouring residential properties in the area is not adversely affected by overlooking in accordance with Policy A1 of the Camden Local Plan.</p>
10	<p>SUDS</p> <p>Prior to commencement of the relevant part of the development details of a sustainable urban drainage system shall be submitted to and approved by the local planning authority in writing. SUDS will be implemented prior to the opening of the relevant parts of the development.</p> <p>Reason: To reduce the rate of surface water run-off from the buildings and limit the impact on the storm-water drainage system in accordance with policies CC1, CC2 and CC3 of the Camden Local Plan.</p>
11	<p>Fire Safety</p> <p>No above ground new development shall commence until a Fire Statement has been submitted to and approved in writing by the Local Planning Authority. The Fire Statement shall be produced by an independent third party suitably qualified assessor which shall detail the building's construction, methods, products and materials used; the means of escape for all building users including those who are disabled or require level access together with the associated management plan; access for fire service personnel and equipment; ongoing maintenance and monitoring and how provision will be made within the site to enable fire appliances to gain access to the building. The</p>

	<p>development shall be carried out in accordance with the approved details.</p> <p>Reason: Above ground development must not commence before this condition is discharged to ensure every element of the development and construction provides a safe and secure development in accordance with Policy D11 of the Intend to Publish Draft London Plan and Policy 7.13 of the London Plan.</p>
12	<p>Water efficiency</p> <p>The development hereby approved shall achieve a maximum internal water use of 105litres/person/day, allowing 5 litres/person/day for external water use. Prior to occupation of each Plot, evidence demonstrating that this has been achieved shall be submitted and approved by the Local Planning Authority.</p> <p>Reason: To ensure the development contributes to minimising the need for further water infrastructure in an area of water stress in accordance with policies CC1, CC2 and CC3 of the Camden Local Plan.</p>
13	<p>Non-road mobile machinery</p> <p>All non-Road mobile Machinery (any mobile machine, item of transportable industrial equipment, or vehicle – with or without bodywork) of net power between 37kW and 560kW used on the site for the entirety of the [demolition and/construction] phase of the development hereby approved shall be required to meet Stage IIIA of EU Directive 97/68/EC. The site shall be registered on the NRMM register for the [demolition and/construction] phase of the development.</p> <p>Reason: To safeguard the amenities of the adjoining occupiers, the area generally and contribution of developments to the air quality of the borough in accordance with the requirements policies A1 and CC4 of the Camden Local Plan.</p>
14	<p>Living <u>roof/walls</u> details and installation</p> <p>Full details in respect of the <u>green and/or brown</u> roof of the hereby approved building as indicated in the Design and Access Statement and the living wall located to the sunken patio shall be submitted to and approved by the local planning authority before the relevant part of the development commences. The details shall include species, planting density, substrate and a section at scale 1:20 showing that adequate depth is available in terms of the construction and long term viability of the green/brown roof, and a programme for a scheme of maintenance shall be submitted to and approved in writing by the local planning authority. The green roof shall be fully provided in accordance with the approved details prior to first occupation and thereafter retained and maintained in accordance with the approved scheme of maintenance.</p> <p>Reason: In order to ensure the development undertakes reasonable measures to take account of biodiversity and the water environment in accordance with policies A3, CC1, CC2 and CC3 of the Camden Local Plan.</p>
15	<p>Tree protection</p> <p>Prior to the commencement of any works, details demonstrating how trees to be retained both on and off site shall be protected during construction work shall be submitted to and approved by the Council in writing. Such details shall follow</p>

	<p>guidelines and standards set out in BS5837:2012 "Trees in Relation to Construction" and should include details of appropriate working processes in the vicinity of trees, a tree protection plan and details of an auditable system of site monitoring. All trees on the site, or parts of trees growing from adjoining sites, unless shown on the permitted drawings as being removed, shall be retained and protected from damage in accordance with the approved protection details."</p> <p>Reason: In order to ensure the development undertakes reasonable measures to take account of trees and biodiversity in accordance with policy A3 of the Camden Local Plan.</p>
16	<p>Land contamination</p> <p>At least 28 days before the development hereby permitted commences a written detailed scheme of assessment consisting of site reconnaissance, conceptual model, risk assessment and proposed schedule of investigation must be submitted to the planning authority. The scheme of assessment must be sufficient to assess the scale and nature of potential contamination risks on the site and shall include details of the number of sample points, the sampling methodology and the type and quantity of analyses proposed. The scheme of assessment must be approved by the LPA and the documentation submitted must comply with the standards of the Environment Agency's Model Procedures for the Management of Contamination (CLR11).</p> <p>Reason: To protect future occupiers of the development from the possible presence of ground contamination arising in connection with the previous industrial/storage use of the site in accordance with policy A1 of the Camden Local Plan.</p>
17	<p>Building Envelope Sound Insulation</p> <p>Internal noise levels in habitable rooms shall comply with BS8233:2014 guidance criteria for indoor ambient noise levels in residential dwellings when they are unoccupied and Table B, Appendix 3: Noise Thresholds of the Local Plan.</p> <p>Reason: To ensure that the occupiers and users of the development do not suffer a loss of amenity by reason of excess noise from environmental noises sources in accordance with the requirements of policies G1, D1, A1, and A4 of the London Borough of Camden Local Plan 2017.</p>
18	<p>Fixed Plant Noise</p> <p>Prior to the installation of any items of fixed plant associated with the operation of the development, a noise report shall be submitted to and approved in writing by the local planning authority.</p> <p>The noise report shall demonstrate that cumulative sound levels from external building services and fixed plant are 10dB or more below the lowest background sound level (15dB if tonal components are present) at the nearest sensitive receptor at any time. The report should reference the proposed noise limits included in the planning application noise report, Table 11: Plant Noise Limits at the Nearest Noise Sensitive Premises.</p> <p>Reason: To ensure that the amenity of occupiers of the development site / surrounding premises is not adversely affected by noise from mechanical installations/ equipment,</p>

	in accordance with Policy A4 of the Camden Local Plan 2017.
19	<p>Cycle parking</p> <p>Prior to first occupation, the following bicycle parking shall be provided:</p> <ul style="list-style-type: none"> - secure and covered parking for 54 resident's bicycles - secure and covered parking for 14 bicycles for staff - 5% shall be non-standard cycle spaces <p>All such facilities shall thereafter be retained.</p> <p>Reason: To ensure that the scheme makes adequate provision for cycle users in accordance with policies T1 and T3 of the Camden Local Plan., the London Plan and CPG7 (Transport).</p>
20	<p>Scooter parking</p> <p>Prior to first occupation of any residential unit, the scooter parking with charging points shall be implemented in accordance with the hereby approved plans. All such facilities shall thereafter be retained.</p> <p>Reason: To ensure that the scheme makes adequate provision for sustainable modes of transport in accordance with policies T1 and T3 of the Camden Local Plan., the London Plan and CPG7 (Transport).</p>
21	<p>Disabled car parking</p> <p>The eight car parking spaces within the basement area shall only be used by blue badge holders and no other residents shall use the spaces.</p> <p>Reason: To ensure that the scheme makes adequate provision for accessible parking in accordance with policy T2 of the Camden Local Plan, the London Plan and CPG7 (Transport).</p>
22	<p>Biodiversity Enhancements</p> <p>Prior to implementation of the development a plan showing details of biodiversity enhancements on the buildings and within the open space (including bird and bat boxes) appropriate to the development's location, scale and design (including wetland areas) shall be submitted to and approved in writing by the local planning authority. The measures shall be installed in accordance with the approved plans prior to the occupation of the development and thereafter retained.</p> <p>Reason: In order to secure appropriate features to conserve and enhance wildlife habitats and biodiversity measures within the development, in accordance with the requirements of the London Plan and in accordance with policy A3 of the Camden Local Plan.</p>
23	PVs

	<p>Prior to first occupation of the hotel and residential building, detailed plans showing the location and extent of photovoltaic cells to be installed on the building shall have been submitted to and approved by the Local Planning Authority in writing. The measures shall include the installation of a meter to monitor the energy output from the approved renewable energy systems. The cells shall be installed in full accordance with the details approved by the Local Planning Authority and permanently retained and maintained thereafter.</p> <p>Reason: To ensure the development provides adequate on-site renewable energy facilities in accordance with the requirements of policies CC1 and CC2 of the Camden Local Plan 2017.</p>
24	<p>Circular Economy</p> <p>Prior to works of demolition, a Reuse and Restoration strategy should be submitted to the local planning authority and approved in writing.</p> <p>The strategy should include details of:</p> <ul style="list-style-type: none"> a) how the building, materials and plant equipment will be disassembled and reused b) timings for disassembly and the site restoration/build out. <p>The disassembly and site restoration must be undertaken in accordance with the approved details.</p> <p>Reason: In order to ensure that the materials are reused in accordance with circular economy principles and to ensure that the land is cleared and left in a reasonable state to retain the visual amenity of the area in accordance with policies D1, D2 and CC2 of the London Borough of Camden and Policy S17 of Intend to publish London Plan (2019).</p>
25	<p>Electric charging points</p> <p>Before the construction of the basement level detailed plans shall be provided to the Council for approval in writing indicating the location 20% active charging points of each Phase's car parking spaces. The charging points shall be provided in their entirety prior to occupation of any units, in accordance with the details thus approved and thereafter be permanently maintained and retained.</p> <p>Reason: To encourage the uptake of electric vehicles, in accordance with Policy 6.13 of the London Plan and T6.1C of the Intend to Publish London Plan.</p>
26	<p>Accessibility: M4(2)</p> <p>89% of the units hereby approved shall be designed and constructed in accordance with Building Regulations Part M4 (2), evidence demonstrating compliance should be submitted to and approved by the Local Planning Authority prior to occupation.</p> <p>Reason: To ensure that the internal layout of the building provides flexibility for the accessibility of future occupiers and their changing needs over time, in accordance with the requirements of policy C6 of the Camden Local Plan 2017.</p>

27	<p>Access – M4(3)</p> <p>11% of the units hereby approved shall be designed and constructed in accordance with Building Regulations Part M4 (3). Evidence demonstrating compliance should be submitted to and approved by the Local Planning Authority prior to occupation.</p> <p>Reason: To ensure that the wheelchair units would be capable of providing adequate amenity in accordance with policy C6 of the Camden Local Plan 2017.</p>
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33 Informatives – planning application

1	Your proposals may be subject to control under the Building Regulations and/or the London Buildings Acts that cover aspects including fire and emergency escape, access and facilities for people with disabilities and sound insulation between dwellings. You are advised to consult the Council's Building Control Service, Camden Town Hall, Judd St, Kings Cross, London NW1 2QS (tel: 020-7974 6941).
2	You are advised that Section 44 of the Deregulation Act 2015 [which amended the Greater London Council (General Powers) Act 1973]] only permits short term letting of residential premises in London for <u>up to 90 days per calendar year</u> . The person who provides the accommodation must be liable for council tax in respect of the premises, ensuring that the relaxation applies to residential, and not commercial, premises.
3	This proposal may be liable for the Mayor of London's Community Infrastructure Levy (CIL) and the Camden CIL. Both CILs are collected by Camden Council after a liable scheme has started, and could be subject to surcharges for failure to assume liability or submit a commencement notice PRIOR to commencement. We issue formal CIL liability notices setting out how much you may have to pay once a liable party has been established. CIL payments will be subject to indexation in line with construction costs index. You can visit our planning website at www.camden.gov.uk/cil for more information, including guidance on your liability, charges, how to pay and who to contact for more advice.
4	Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. You are advised to consult the Council's Noise and Licensing Enforcement Team, Camden Town Hall, Judd St, Kings Cross, London NW1 2QS (Tel. No. 020 7974 4444 or search for 'environmental health' on the Camden website or seek prior approval under Section 61 of the Act if you anticipate any difficulty in carrying out construction other than within the hours stated above.
5	Your attention is drawn to the fact that there is a separate legal agreement with the Council which relates to the development for which this permission is granted. Information/drawings relating to the discharge of matters covered by the Heads of Terms of the legal agreement should be marked for the attention of the Planning Obligations Officer, Sites Team, Camden

	Town Hall, Argyle Street, WC1H 8EQ.
6	Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

APPENDIX 1 – First Independent Viability Review (BPS)

APPENDIX 2 - Second Independent Viability Review (BPS)