



14-19 Tottenham Mews

**Planning Statement**

November 2020

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## 1. INTRODUCTION

1.1 This planning statement has been prepared by DP9 Ltd on behalf of Central London Commercial Estates Limited ('the Applicant') in support of a full planning application for the development of 14-19 Tottenham Mews.

1.2 The description of the development proposed as included on the submitted Planning Application Form for planning permission is:

*"Erection of a ground plus five storey building (plus one basement level) to provide office (e class) at part ground and basement level and residential dwellings (C3) at ground and floors one to five and associated landscaping, cycling parking and all necessary enabling works."*

1.3 A full description of development is contained within section 4 of this statement

1.4 The site comprises a temporary prefabricated building dating from the 1970s, which is located on the western side of Tottenham Mews. The building is currently vacant and is soon to be demolished by the Applicant to allow the site to be utilised to facilitate the construction of the approved scheme at Middlesex Hospital Annex.

1.5 The eastern side of the mews is occupied by a series of individual mews buildings of varied design which are predominantly 4 storeys high from the ground level (several with additional half basements). The mews is accessed from the south from Tottenham Street.

1.6 The proposed development is of a high-quality architectural design, providing a mix of uses within Fitzrovia. The Applicant has also undertaken consultation with key stakeholders including local community members, residents and business owners.

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- 1.7 This document will provide an overview of the site and the proposed developments and considers the relevant planning policies and sets out a justification for their development.
- 1.8 A separate Outline Planning and two Reserved Matters applications for office and life sciences has been submitted at 95-100 Tottenham Court Road, 76-80 Whitfield Street and 88 Whitfield Street. Within Camden, under planning policy H2, there is a requirement to provide residential as part of non-residential developments above 200sqm. 14-19 Tottenham Mews is the off-site housing site and so this application is submitted in parallel with these applications and will be linked via a section 106 agreement.
- 1.9 This Planning Statement comprises six sections following this introduction, as follows:
- Section 2: Provides a description of the site and context;
  - Section 3: Provides a summary of the planning history;
  - Section 4: Sets out a summary of the proposed development;
  - Section 5: Provides information on the pre-application process;
  - Section 6: Provides a Planning Policy Overview
  - Section 7: Assesses the proposed development against the relevant national and local planning policy;
  - Section 8: Sets out the draft HOTS that will arise as part of the development; and
  - Section 9: Sets out the conclusions.
- 1.10 The application should be read in conjunction with the following documents submitted:
- Application Forms
  - CIL forms
  - Existing Drawings

- Proposed Drawings
- Design and Access Statement
- Affordable Housing Statement
- Planning Statement
- Historic Building Report and Townscape Assessment
- Basement Impact Assessment & Structural Report
- Noise Impact Assessment
- Air Quality Assessment
- Transport Statement
- Travel Plan
- Delivery, Servicing and Management Plan
- Statement of Community Involvement
- Construction/Demolition Management Plan (and proforma)
- Archaeological Desk Based Assessment
- Surface Water Drainage Statement
- Fire Strategy
- Ventilation & Extraction Statement
- Plant Noise Assessment
- Acoustic Report
- Daylight and Sunlight Assessment
- Access Statement
- Energy Statement
- Sustainability Statement
- Ecological Appraisal

## 2. SITE CONTEXT

- 2.1. The 0.05 ha site is located at 14-19 Tottenham Mews at the western side of the mews street, accessed from Tottenham Street to the south.
- 2.2. The site falls within the Charlotte Street Conservation Area. The Charlotte Street Conservation Area Appraisal and Management Plan describes the existing building as prefabricated buildings which detract from the overall character of the street.
- 2.3. The site is located within the Central London Activities Zone and the site is also within the Fitzrovia Area Action Plan (2014) (FAAP), where it is designated for redevelopment.
- 2.4. The existing building is currently vacant and has a dedicated D1 medical / healthcare use. The building stands two storeys high, with no current basement. The roof is flat and is lower than the immediate surroundings.
- 2.5. The existing building's appearance is of low-quality prefabricated style. The building does not have any relevance with the surrounding context, in terms of materialistic, fenestration grids, or mass. The ground floor is currently boarded up with corrugated metal sheets. An external escape stair is connected to the building's north face. Planning permission to demolish the building was granted on 11 November 2020. The intention is that the site will be utilised to facilitate the construction of the approved scheme at Middlesex Hospital Annex in the interim.
- 2.6. The site is highly accessible by public transport with a Public Transport Accessibility Level (PTAL) rating of '6B' which represents the highest level of accessibility defined by Transport for London (TfL).

### ***Surrounding Area***

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- 2.7. The site is bound by Arthur Stanley House to the South, Middlesex House to the west, and the Middlesex Annex Hospital site to the north. The buildings opposite on the eastern side of Tottenham Mews consist of traditional mews buildings. The Corner Building to the south-eastern corner of Tottenham Mews was completed in 2015.
- 2.8. There are two major sites under construction in the near vicinity, Arthur Stanley House to the south, and the Middlesex Annex Hospital site to the north, both mixed use developments with residential and office accommodation.
- 2.9. Permission has recently been granted for a single storey mansard extension to the top of 13 Tottenham Mews for office use, and an infill site is currently under construction at the back of 77-79 Charlotte Street facing Tottenham Mews to accommodate office use.

### 3. PLANNING HISTORY

- 3.1. The site's full planning history as per Camden's online planning register is set out in the table 1 below. Of particular relevance is the application granted for a five-storey building for a mental health resource centre in 2012.

Reference	Date Validated	Description	Decision
2020/3289/P	28-07-2020	Demolition of existing two storey building.	11.11.2020
2012/5306/C	04-10-2012	Demolition of existing two storey Mental Health Resource Centre (MHRC) building (Class D1).	13-12-2012
2012/4786/P	21-09-2012	Erection of a 5 storey building, including basement level and roof level plant enclosure, to provide a Mental Health Resource Centre (MHRC) including recovery centre, consultation and activity rooms (Class D1) and 6 x 1 bed short-stay bedrooms (Class C2) (following demolition of existing two storey MHRC building (Class D1)).	13-12-2012
17539	12-10-1973	Tottenham Mews, W1. Erect a two storey, prefabricated building to accommodate a Psychiatric Centre and Day Hospital as shown on drawings Nos. 2139/1/1 and 3; our registered No. 17539.	07-02-1974



## 4. APPLICATION PROPOSAL

- 4.1. This application seeks full planning consent for erection of seven storey building including basement for a residential led mixed-use scheme.
- 4.2. The description of development is:  
*“Erection of a ground plus five storey building (plus one basement level) to provide office (e class) at part ground and basement level and residential dwellings (C3) at ground and floors one to five and associated landscaping, cycling parking and all necessary enabling works.”*
- 4.3. The Design and Access Statement submitted with this application fully illustrates and describes the proposed development.
- 4.4. 14-19 Tottenham Mews provides a great opportunity to create much needed affordable accommodation within a central part of London. The vacant site lends itself to new, high-quality building which will complete the street and complement its immediate surroundings.

### **Scale, Massing and Design**

- 4.5. The proposed building replaces the existing 2-storey and follows the same building line fronting Tottenham Mews.
- 4.6. The building is c.20.45m above existing ground level to the top of the lift overrun. The building mass is articulated with two setbacks, one on the 4th floor, and a further set-back on the 5th floor.
- 4.7. The appearance of the building is developed from an understanding of the local surroundings, notably the mews terraces facing directly opposite on Tottenham Mews. The site occupies a large portion of the street frontage of Tottenham Mews, therefore requiring a high-quality facade to complete the

mews. The fenestration grid is subtly broken down to avoid a continuous monolithic facade.

- 4.8. The proposed building material is brick with projecting Juliette balconies for the affordable homes to offer further amenity to the apartments.

### Land Uses

- 4.9. The proposed building is a mixed-use residential led development comprising 23 affordable social and intermediate rent apartments, with a ground floor and basement Class E(g) affordable workspace.

- 4.10. The proposed tenure and mix of units are set out in table 1

No Bed	Social Rented	Intermediate
Studio	0	2
1 bedroom	0	3
2 bedrooms	6	8
3 bedrooms	4	0
<b>Total</b>	<b>10</b>	<b>13</b>

Table 1

- 4.11. The proposed floorspace of the development is as follows

Use	GIA	GEA
Class C3 (residential)	2338.95 sqm	2670.66 sqm
Class E g (office)	374.98 sqm	456.11 sqm
<b>Total</b>	<b>2713.93 sqm</b>	<b>3126.77 sqm</b>

- 4.12. The main residential entrance is in the middle of the building from Tottenham Mews, providing level access to the main lobby. The ground floor accommodates two wheelchair accessible dwellings. These homes are accessed through the main lobby for security and privacy.
- 4.13. The main affordable workspace entrance is from Bedford Passage to the north. A further entrance is provided from the undercroft passage with the mews, for increased activity and security at street level.

### **Public Realm**

- 4.14. Due to the nature of the site, there are limited options to develop landscaping and open spaces within the planning boundary of the site. However, the Applicant is proposing public realm enhancements by offering part of the ground level for public use, creating a link between Tottenham Mews and Bedford Passage, increasing permeability to pedestrians.

### **Transport**

- 4.15. Access to the site will be taken directly from Tottenham Mews, in a similar manner to other properties within the Mews. Vehicle access into the site will not be possible, with all deliveries to be undertaken from sections of single yellow line kerbside within Tottenham Mews.
- 4.16. The proposals will not provide any on-site car parking spaces. This car-free approach is considered appropriate given the spatial constraints of the site and the highly accessible location of the site within central London (as evidenced by the PTAL rating of 6b). Disabled car users will be expected to make use of on street parking bays in the local area, such as the three parking bays available on Tottenham Street circa 45 metres from the site.
- 4.17. Cycle parking for each use class on-site will be provided in line with the new draft London Plan standards.

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### **Sustainability**

- 4.18. The scheme will target Home Quality Mark certification, balancing the carbon, social and cost elements of the assessment.
- 4.19. The environmental impacts of materials will be reviewed with a life cycle assessment undertaken as part of the design development. A blue roof system is proposed at 5th floor and roof levels for rainwater attenuation.

## 5. PRE-APPLICATION CONSULTATION

- 5.1. The proposed development represents the culmination of extensive pre-application discussions with a wide range of stakeholders over a significant period of time. These stakeholders include LBC, the Environment Agency, Registered providers, local businesses and landowners, local resident's groups and other organisations with an interest in Fitzrovia.
- 5.2. The application is not referable to the GLA as it does not exceed the relevant thresholds set out in the Town and Country Planning (Mayor of London) Order 2008) as amended). However, the GLA is aware of the site and the affordable provision due to it being the off-site housing development associated with the redevelopment of the Network building at 95-100 Tottenham Court Road, 76-80 Whitfield Street and 88 Whitfield Street located under 500m away.
- 5.3. Formal pre-application discussions have been undertaken with LBC on the evolving scheme since 2018. The meetings have included discussions on the following matters:
- Land Use;
  - Height and massing;
  - Townscape and local views;
  - Public Realm
  - Façade and materiality;
  - Viability;
  - Transport and servicing; and
  - Sustainability.
- 5.4. The scheme has been developed in response to these discussions.

*Meetings with Camden*

- 5.5. The proposed design has been developed from April 2018 through to November 2020. A number of iterations were developed during the design process, experimenting with the fenestration grid, vertical and horizontal treatment of the facades, and the tone of primary materials. The internal layouts in particular have been discussed extensively, and have been developed to make maximum use of the site, providing as much-needed affordable housing in a central location within this part of the borough
- 5.6. Initial pre-application meetings were held on 25th September 2018, and 20th January 2019, during which the following key comments were discussed and subsequently addressed:
- A flat facade following the existing building line is preferred on the mews street
  - Visibility of the pedestrian route more clearly highlighted eg. with a different facade treatment to the ground level.
  - The massing set back further along Bedford Passage to reduce impact from street level.
- 5.7. A further two pre-application meetings were held with LBC to review the detailed proposals, on 9th June, and 16<sup>th</sup> July 2020. The following key comments were discussed and subsequently addressed:
- The ground floor treatment has been revised to create a more varied facade along the pedestrian passage. Officers queried the size of the openings at ground floor.
  - The fenestration openings and detailing has been brought up to the ceiling level to enhance the height of the ground floor.
  - The facade grid has been revised to create further articulation across the elevation.

- Further investigation should be undertaken to see whether the architect could soften the sense of uniformity by looking at a bit more ‘push and pull’ at ground floor (and/or materiality).
- The 5th floor material has been revised to a metal cladding reflecting traditional high-level materials.
- The overall facade grid has been further refined responding to the mews grid opposite, while retaining the building’s uniformity.

### ***Design Review Panel***

- 5.8. The Applicant presented the scheme to the Design Review Panel on 11 September 2020.
- 5.9. The panel were ‘impressed’ by the quality of the proposed elevations, which will result in a building that makes a significant improvement to the site. It was suggested that the ground floor height could be increased to match the soffit line of the neighbouring building to the south, Arthur Stanley House. This would result in a higher ground floor that would also suit the mews typology.
- 5.10. The panel considered the bulk and massing of the scheme as ambitious but acceptable given the quantum of affordable housing it seeks to provide. It was recommended that lighting levels should be carefully tested to ensure that homes on both sides of the mews receive good levels of daylight.
- 5.11. The panel had some concerns by the lack of amenity space for flats, particularly for social rented units and those that are likely to house children. Any large social rented family unit should be provided with at least some directly accessible private external amenity space. The panel suggested that the design team explore the incorporation of small balconies to ensure everyone has access to at least some outside space. It asks the team to look at how these could be designed to maximise their amenity value - for example by

incorporating planters, or so it is possible at least to stand in the depth of the reveal.

5.12. The following amendments have been made to the scheme in response to these comments received at pre-application stage as set out below and in section 7.

- Single aspect units facing Middlesex House (west) were omitted, replaced by dual-aspect units with frontages to Tottenham Mews.
- Privacy to the ground floor units has been increased with the introduction of a wider defensible zone between ground level windows and the pavement.
- The depth of Juliette balconies facing Tottenham Mews has been increased for the potential for e.g. tenant installed planting.

#### Consultation

5.13. The objectives of the consultation were to ensure that local residents, community groups, interested parties and elected representatives were made aware of the emerging proposals and had an opportunity to participate in shaping the plans. The Applicant therefore implemented a comprehensive programme of community engagement which began in July 2020 and included the following:

- **Digital Consultation Website** — A digital website was created and has been live since 5th October featuring information about the scheme, exhibition boards to download and a survey designed to gather feedback and comments on the proposals.
- **Engagement with locally elected representatives** — From the outset, the Applicant sought to engage with the site's Ward Councillors from Camden City Council as well as the Cabinet Member for Investing in Communities, Culture and an Inclusive Economy
- **Engagement with community groups and local stakeholders** — The Applicant sought to engage with local community groups throughout



the process and have offered an initial briefing and a further briefing to groups such as The Charlotte Street Association, The Fitzrovia Partnership BID, Bloomsbury Conservation Area Advisory Committee, Fitzrovia Neighbourhood Association and the Bloomsbury Association.

- **Direct liaison with residents and businesses** — The Applicant ensured that members of the project team were able to discuss the plan with residents and businesses who wished to be involved in the application process undertaking targeted hand delivered letter to gather feedback by directing people to the online consultation. The Applicant also engaged with members of its Community Fund throughout the process ensuring they were informed and had the opportunity to provide comment.

5.14. Full details of the pre-application consultation process and responses received are included within the Statement of Community Involvement (SCI) prepared by Concilio which accompanies the planning application

## 6. PLANNING POLICY FRAMEWORK AND OVERVIEW

- 6.1. This section provides a brief summary of the key planning policies relevant to the site and its redevelopment. The planning policy context comprises three levels of adopted and emerging policy – national, regional and local. Within each level there is both planning policy and guidance which combine to provide the framework for consideration of the proposed development. The key planning policy documents taken into account at this stage and referred to in this planning statement include those listed below.
- 6.2. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan, unless other material considerations indicate otherwise.
- 6.3. The proposed development should be considered against relevant policies contained in the current adopted Development Plan for Camden comprising of the following planning policy documents:
- London Plan (“LP”) (2016, as amended in January 2017)
  - Camden Local Plan (“CLP”) (2017)
  - Fitzrovia Area Action Plan (2014)

### ***Other Material Considerations***

#### *The NPPF*

- 6.4. The replacement NPPF was published in February 2019, and establishes the overarching principles of the planning system, including the requirement of the system to ‘drive and support development.’ The NPPF retains the main principles of the previous version and should be read as a whole.
- 6.5. Paragraph 11 confirms that at the heart of the NPPF is a presumption in favour of sustainable development. Paragraph 11 confirms that: - for decision taking, this means;

- c) approving development proposals that accord with an up to date development plan without delay; or
- d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, granting permission unless: -
  - i) the application of policies in this framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
  - ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole.”

6.6. Paragraph 12 confirms that: *“the presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision making. Where a planning application conflicts with an up to date development plan... permission should not usually be granted. Local authorities may take decisions that depart from an up to date development plan, but only if material considerations in a particular case indicate that the plan should not be followed.”*

6.7. Chapter 4 of the NPPF relates to decision making. Paragraph 38 states that: - *“Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permissions in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision makers at every level should seek to approve applications for sustainable development where possible.”* The NPPF introduces a new section on making effective use of land. This states that planning policies and decisions should promote an effective use of land in meeting the need for new homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.

- 6.8. Paragraph 122 states that planning policies and decisions should support development that makes efficient use of land, taking into account identified needs, market conditions, the availability of infrastructure, the desirability of preserving an areas character or promoting regeneration and change, and the importance of securing well designed, attractive and healthy places.
- 6.9. Paragraph 124 states that the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps to make development acceptable to communities.
- 6.10. Paragraph 127 provides criteria for policies and decisions to ensure developments function well, have good architectures, are sympathetic to local character and history, establish a strong sense of place, optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development, and create places that are safe inclusive and accessible.
- 6.11. The NPPF sets out a range of measures to promote healthy and safe communities, including open space and recreation; to promote sustainable transport, and achieve well designed places. Applicants are advised to work closely with the community, (paragraph 128) and local authorities should make appropriate use of processes for improving design, including design advice and reviews, including the recommendations of design review panels. (paragraph 129).
- 6.12. Paragraph 130 states that, inter alia: -

*“Planning permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents.*

*Conversely, where the design of a development accords with clear expectations in plan policies, design should not be used by the decision maker as a valid reason to object to development.”*

- 6.13. Section 16 of the NPPF relates to conserving and enhancing the historic environment. This updates the previous NPPF, but largely restates the well-established principles set out in the previous version and by subsequent legal decisions. In summary, paragraph 193 restates the general principle that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be) This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

***Draft New London Plan***

- 6.14. The New London Plan was initially published for consultation on 1st December 2017, and minor suggested changes published in July 2018. The draft new London Plan was considered at an Examination between January and May 2019 and the panel of inspectors issued their report on 8 October 2019. The Mayor released an Intended to Publish London Plan on 9 December 2019. The SoS issued a letter on 13 March 2020 directing that the Mayor cannot publish the new London Plan until he has incorporated Directions set out by the SoS. Due to the advanced stage of the draft new London Plan it is a material consideration of some weight; once published it will become part of the Development Plan.

***Local Planning Policy: Camden Local Plan (2017)***

- 6.15. At the local level, Camden’s Local Plan (2017) was adopted by Council on 3 July 2017 and has replaced the Core Strategy and Camden Development Policies

documents as the basis for planning decisions and future development in the borough.

### ***Draft Site Allocations DPD***

- 6.16. Following the adoption of the Local Plan in 2017, Camden is reviewing the Sites Allocations Document. This document sets out the Council's approach to future development on key sites across the borough. Once adopted this Plan will replace policies in the 2013 Site Allocations Plan. It will be used alongside other policies in Camden's Development Plan to assess development proposals on key sites and areas. Consultation on the draft Site Allocations Local Plan took place between early 2020. Camden is currently preparing a statement setting out information about the consultation. This statement will be updated and published at each stage of the plan-making process and submitted to the Inspector for consideration as part of the examination of the Plan. At the time of writing this allocations document holds little weight in the determination of the planning application.

### ***Supplementary Planning Guidance and Supplementary Planning Documents***

- 6.17. Supplementary Planning Guidance and Documents (SPGs and SPDs) are also material planning considerations. Relevant SPDs and SPGs are noted below.

### ***Local***

- 6.18. LBC has also prepared a number of supplementary documents to provide guidance on adopted policies. These documents form material considerations but do not form part of the Development Plan. Of relevance to the development are following supplementary planning documents (SPD).
- Camden Planning Guidance - Design (March 2019);
  - Camden Planning Guidance - Basements (March 2018);
  - Camden Planning Guidance - Interim Housing (March 2019)

- Camden Planning Guidance - Employment Sites and Business Premises (March 2018);
- Camden Planning Guidance 3 (CPG3) - Sustainability (July 2015, updated March 2018);
- Camden Planning Guidance - Energy Efficiency and Adaptation (March 2019);
- Camden Planning Guidance 6 - Amenity (September 2011, updated March 2018);
- Camden Planning Guidance - Public Open Space (March 2018);
- Camden Planning Guidance - Air Quality (March 2019);
- Camden Planning Guidance - Transport (March 2019);
- Camden Planning Guidance - Trees (March 2019);
- Camden Planning Guidance - Developer Contributions (March 2019);
- and;
- Camden Planning Guidance - Water and Flooding (March 2019).

## 7. PLANNING POLICY ASSESSMENT

- 7.1. This section assesses the proposed development against relevant planning policy and planning guidance.

### Principle of Development

- 7.2. The principle of the proposed development accords with current and emerging planning policy guidance. National policy, the London Plan and the Local Plan all seek to ensure that development achieves the highest possible intensity of use compatible with the local context in order to deliver a scale of development which makes the most effective and efficient use of land.
- 7.3. Paragraph 7 of the NPPF outlines that *“the purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.”*
- 7.4. Camden Council’s overarching objective is to create the conditions for growth to provide the homes, jobs and other facilities needed to support it, while ensuring that growth delivers opportunities and benefits for their residents and businesses.
- 7.5. The Council has developed a series of objectives for the Local Plan to achieve its vision. The strategic objectives of the Plan are as follows:
1. Developing new solutions with partners to reduce inequality and improve health and wellbeing;
  2. Creating conditions for and harnessing the benefits of economic growth; and
  3. Investing in our communities to ensure sustainable neighbourhoods.



- 7.6. The principle of the redevelopment of the site is established within the Fitzrovia Area Action Plan, which identifies the site as an ‘opportunity site’ for development. The site also gained planning permission in 2012 to demolish and redevelop the building for development (refer to section 3).
- 7.7. The proposed development is considered to achieve sustainable development since it meets all the above key planning principles for redevelopment of the site. The proposal is a mixed-use redevelopment of a brownfield site located in a highly accessible location by public transport in London.
- 7.8. For the reasons outlined above, the principle of the proposed development is consistent with the broad objectives of planning policy and in accordance with the Government’s overarching objectives for sustainable growth. The proposed development is acceptable in principle and should be supported in this location.

### **Land Use**

#### *Loss of D1 (Medical)*

- 7.9. The site is currently vacant and has been for over 6 years. The previous use of the site was in Class D1 medical use. The designation within the FAAP is for medical/healthcare use, and the designation states that the site could potentially provide around 1,400sqm of additional medical floorspace. Camden Local Plan Policy C1e) states that the Council will protect existing health facilities in line with Policy C2 Community Facilities. Policy C2g) states: *‘The Council will... ensure existing community facilities are retained recognising their benefit to the community, including protected groups, unless one of the following tests is met:*
- i. a replacement facility of a similar nature is provided that meets the needs of the local population or its current, or intended, users;*
  - ii. the existing premises are no longer required or viable in their existing use and there is no alternative community use capable of meeting the needs of the local*

*area. Where it has been demonstrated to the Council's satisfaction there is no reasonable prospect of a community use, then our preferred alternative will be the maximum viable amount of affordable housing;'*

7.10. All services previously provided at 14-19 Tottenham Mews were relocated in their entirety to alternative accommodation on Kings Cross Road in 2012, and these services continue to be provided as follows, subject to organisational and structural changes which have occurred in the meantime:

- Community Mental Health Teams – South Camden Services have subsequently been relocated to St Pancras Hospital South Wing, Camley Centre and Residence Building.
- New 6 Bed Crisis House and Crisis Resolution Team – This was constructed in 2014 at St Pancras Hospital by refurbishing a former chapel/nursery building (Rivers Crisis House).
- South Camden Recovery Centre – This is provided at the Jules Thorn Day Centre, St Pancras Hospital.
- Approved Mental Health Professional Duty Team – This is at St Pancras Hospital.

7.11. As such, it is considered that the proposed loss of D1 floorspace is acceptable in principle as it has been demonstrated that, in accordance with part ii, of policy C2g the existing premises are no longer required or viable in their existing use and there is no alternative community use capable of meeting the needs of the local area. In addition, in accordance with policy, it has been demonstrated that there is no reasonable prospect of a community use, and the preferred alternative route has therefore been provided which is the maximum viable amount of affordable housing.

### ***Principle of Residential***

7.12. At the heart of NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both the plan-

making and decision-taking process. This means approving development proposals that accord with the development plan without delay and, where there are no relevant development plan policies, granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits of development.

- 7.13. Paragraph 62 of the NPPF states that, where there is a need identified for affordable housing, the affordable housing should be provided on-site, except in justified circumstances.
- 7.14. The definition of affordable housing included within the Glossary (Annex 2) of the NPPF includes Social Rented, Affordable Rented and Intermediate tenure housing as affordable housing i.e. housing provided to eligible households whose needs are not otherwise met by the market.
- 7.15. Policy 3.3 of the adopted London Plan states that the Mayor recognises the need for more homes in London to promote opportunity and provide real choice for all Londoners in ways that meet their needs at a price they can afford. The Mayor will work with relevant partners seek to ensure that housing need as identified in the Plan, is met and monitored, periodically, going forward through the lifetime of the Plan.
- 7.16. Policy 3.5 seeks to ensure that housing development is of the highest quality internally, externally and in relation to their context and the wider environment.
- 7.17. Policy 3.8 seeks to generate genuine housing choice that is affordable and in high quality environments.
- 7.18. Policy 3.9 seeks mixed and balanced communities. That is, new developments should be balanced by tenure and household income to foster diversity, redress social exclusion and strengthen communities' sense of responsibility for their neighbourhoods. The policy requires a more balanced mix of tenures,

particularly in some neighbourhoods where social renting predominates and there are concentrations of deprivation.

- 7.19. With regard to housing targets, Policy H1 states that *'The Council will aim to secure a sufficient supply of homes to meet the needs of existing and future households by maximising the supply of housing and exceeding a target of 16,800 additional homes from 2016/17 - 2030/31, including 11,130 additional self-contained homes.'* The supporting policy text states that *'the housing trajectory indicates that there are sufficient identified sites in place to provide just over 17,100 additional homes from 2016/17 to 2030/31 and exceed our housing targets throughout the Plan period.'* This estimate is based on a list of allocated sites, included within the evidence base for the Local Plan. In the Fitzrovia Area a total of 142 dwellings are identified through allocated sites: Astor College (60 student housing units), Middlesex Hospital Annex (58 units), Arthur Stanley House (16 units) and 61-63 Tottenham Court Road (8 units). The forecast housing delivery statistics do not take account of unallocated (windfall) sites likely to come forward for residential development in addition to the allocated sites. Fitzrovia itself is expected to provide 200 homes, as set out in the FAAP. The FAAP identifies the Arthur Stanley House site as suitable for providing 16 residential units.
- 7.20. The Draft New London Plan states there is a need to deliver circa 43,500 affordable homes per year, as established in the London Strategic Housing Market Assessment. The Council's annual target is 1,086 homes per annum, an increase of 197 compared to the current London Plan.
- 7.21. Policy H5 of the draft London Plan identifies the Mayor's strategic target for affordable homes, which is for 50% of all new homes delivered across London to be affordable.
- 7.22. Policy H6 of the draft London Plan encourages residential and mixed-use developments to provide affordable housing through the threshold approach

is consistent with the GLA Affordable Housing and Viability SPG, dated August 2017.

- 7.23. The threshold proposed is 35% of a scheme as affordable housing based on habitable rooms. Schemes that do not meet (or exceed) the 35% threshold and do not meet the specified tenure mix and all other requirements and obligations, will be required to submit viability information.
- 7.24. Policy H3 of the CLP outlines that the Council will aim to ensure that existing housing continues to meet the needs of existing and future households by *“resisting development that would involve a net loss of residential floorspace, including any residential floorspace provided.”*
- 7.25. The Fitzrovia Area Action Plan sets forward a target of 200 additional homes by 2025 and requires all identified opportunity sites to provide on-site accommodation in accordance with policy requirements.
- 7.26. The principle of residential is acceptable in principle on this site. As set out in paragraph 7.9, the site is currently vacant. The previous use of the site was in Class D1 medical use, but the services were relocated in their entirety to alternative accommodation on Kings Cross Road in 2012, and the site was no longer required for healthcare facilities. As set out in the FAAP, where it has *“been demonstrated to the Council’s satisfaction there is no reasonable prospect of a community use, then our preferred alternative will be the maximum viable amount of affordable housing.”* Pre-application meetings have taken place with LBC since 2019 and it has been demonstrated by the Applicant that community/medical use is no longer required at this location. The council have confirmed that the principle of providing affordable housing is acceptable.

- 7.27. The provision of housing and affordable housing must be justified, taking into account the criteria set out in Local Plan policies H2 and H4. 14-19 Tottenham Mews is the 'off site' solution for the housing required under policy H2 associated with the proposed development at Network Building (95-100 Tottenham Court Road). The assessment of the proposed development and the decision to take the housing off site (in accordance with the criteria under policy H2) has been set out in the planning statement for the Network building prepared for the outline and subsequent reserved matters. These applications have been submitted and should be read in parallel with this application.

### ***Affordable Housing***

- 7.28. The Local Plan requirement under Policy H4 part a) in regards affordable tenure is for 60% social-affordable rent and 40% intermediate, calculated by floorspace.
- 7.29. The proposals are for 10 Social Rent homes and 13 Intermediate Rent homes. When considered on a floorspace basis the overall tenure split is 50/50. Policy does allow for flexibility against the target requirements under H4, considering the different criteria at parts j) to p).
- 7.30. As set out in policy above, viability is a consideration. It has been demonstrated that the current 50/50 provision is the maximum reasonable. In this instance, the tenure split has also been informed by discussions with Registered Providers and the physical configuration of the building. The affordable tenures are currently configured so that the Social Rent homes are arranged over ground, first and second floors, and the Intermediate homes over third, fourth and fifth floors. In order to achieve a 60/40, split the third floor would need to be a mixed tenure floor and the Registered Providers consulted as part of the design process have advised that mixed tenure floors are not suitable from a management perspective.

***Affordability***

- 7.31. The Social Rent homes are to be let at London Affordable Rent levels. London Affordable Rent is a housing product introduced by the Mayor of London to replace central government's Affordable Rent product in London, with rents based on traditional social rents. Further information on the Benchmark levels for London Affordable Rented are set out in the accompanying affordable housing statement prepared by DS2.
- 7.32. The 13 Intermediate homes will be provided as Intermediate Rent. This is aligned with the Council's priorities, with the Local Plan and Housing CPG noting that the Council generally seek Intermediate Rent over other forms of Intermediate housing such as Shared Ownership.
- 7.33. The Intermediate Rent homes will be provided in accordance with the Council's Intermediate Housing Strategy (April 2016). This ensures that homes are affordable to households on gross incomes of between £30,000 and £40,000 (adjusted for wage inflation). Rents are calculated on the basis that housing costs (rent and service charges) being no greater than 40% of net income and net income being 70% of gross income. These ratios are consistent with Mayoral guidance set out in the GLA's Annual Monitoring Report.

***Unit Mix***

- 7.34. Local Plan Policy H7 aims to secure a range of homes of different sizes, best addressing the Council's housing needs.
- 7.35. Policy H7 outlines that the Council will seek to ensure that all housing developments "*contributes to meeting the priorities set out in the Dwelling Size Priorities Table.*" The table is provided in the supplementary text paragraph 3.189)

	1 bed (or studio)	2 bed	3 bed	4 bed (or more)
Social-affordable rented	Lower	High	High	Medium
Intermediate affordable	High	Medium	Lower	Lower
Market	Lower	High	High	Lower

7.36. The Development address the policy requirements through a mix of unit types which respond to the Council's specific housing needs for the different tenures. The mix of unit types has been discussed with both Council Housing and Planning Officers as well as with the Registered Providers consulted during the design process.

7.37. The proposed mix of units is as follows:

No Bed	Social Rented	Intermediate
Studio	0	2
1 bedroom	0	3
2 bedrooms	6	8
3 bedrooms	4	0
<b>Total</b>	10	13

7.38. The proposal includes a greater proportion of larger homes within the Social Rent component, including 40% as 3-bedroom family homes in accordance with the Council's priorities table. Given the dense urban nature of the local environment and level of external amenity space in the local area, as well as the potential for vehicular traffic down the mews, any further provision of family homes is not considered suitable in this instance.

7.39. For the Intermediate homes the proposal includes a greater proportion of smaller homes, again in line with Council priorities table thereby ensuring that homes can be accessed by households on lower incomes. It is for this reason



that the Council do not consider the provision of 3-bedroom intermediate units appropriate in the borough.

- 7.40. In summary, the combination of larger Social Rent homes and smaller Intermediate homes best addresses Council's dwelling size priorities, whilst limiting overall child densities and intermediate housing costs.

### ***Amenity Space***

- 7.41. Policy 3.5 of the London Plan states that housing developments should be of the highest quality internally, externally and in relation to their context and to the wider environment, taking account of strategic policies in this Plan to protect and enhance London's residential environment and attractiveness as a place to live.
- 7.42. Section 4.10.1 of Mayor's London Housing Design Guide (LHDG) establishes private open space standards for new dwellings having considered the space required for furniture, access and activities and in relation to the number of occupants. The LHDG sets out a minimum of 5 sq m of private outdoor space is required for all 2 person dwellings and an extra 1 sq m should be provided for each additional occupant. The LHDG states that these minimum areas and dimensions provide sufficient space for either a meal around a small table, clothes drying, or for a family to sit outside with visitors.
- 7.43. CLP policy A2 states that to secure new and enhanced open space and ensure that development does not put unacceptable pressure on the Borough's network of open spaces, the Council will *"ensure developments seek opportunities for providing private amenity space."*
- 7.44. Policy D1 of the CLP outlines that the Council will secure high quality design in development and require that development *"incorporates outdoor amenity space."*

- 7.45. Due to the constrained nature and location of the site, amenity space for the residents has been incorporated where possible. Throughout the design process, two registered housing providers for Camden have been frequently consulted over the design development of the scheme – Newlon Housing Trust and Origin Housing. The current scheme layouts were presented to both parties prior to submission, and both Newlon and Origin both responded positively and accepted the design rationale on the key issues such as lack of outdoor amenity space.
- 7.46. The proposed building has been designed so that each apartment is larger than the required residential standards, and a Juliette balcony is provided to each of the kitchen/dining/living rooms. The reason why ‘full balconies’ have not been included is due to the implications this would have on internal daylight. Projecting and recessed balconies will drop the daylight to affected rooms significantly.
- 7.47. Following feedback from the DRP and Officers at LBC, the Juliette balconies have been extended to all living/kitchen/dining rooms facing Tottenham Mews, providing c. 500mm space between the balustrade and the glazed doors, to allow for the installation of e.g. planters. Balconies are not common on existing, or emerging residential proposals along Tottenham Mews, and the Juliette balconies are closer to the character of the mews.
- 7.48. The fifth floor accommodates three intermediate rent apartments. The larger 2-bedroomed apartments have a designated private amenity terrace of 12.3sqm and 11.1sqm.
- 7.49. Play space is not proposed to be provided on this site. Play space amenity would compromise the private amenity space for the apartments. The roof top is also currently occupied by PV’s. Any play space in this location would require a higher parapet and even higher fencing. This would also trigger further fire-fighting measures (over 18m threshold), so the core would essentially get larger, reducing area for residential accommodation.

- 7.50. Given the dense urban nature of the local environment and level of external amenity space in the local area, no further amenity is able to be provided over what has been proposed. Adding further amenity would begin to compromise the internal daylight and the proportion of affordable homes proposed as certain amendments would be required to the building which would impact upon the number of residential units. Taking all factors into account, the proposed level of amenity is considered acceptable in this instance.

### ***Residential Quality***

- 7.51. Future occupants' quality of life has been considered to ensure that all residents will be provided with high-quality, comfortable living accommodation. The layout of the residential units has been carefully considered, and the number of dual aspect units has been maximised where possible.
- 7.52. The GLA Housing SPG (March 2016) provides good practice guidance on shared circulation, stating that each core should be accessible to no more than eight units per floor. The Proposed Development has sought to ensure that the number of units per core remains in line with this guidance. A maximum of 5 units per core are proposed on the lower floors and 4/5 on the upper floors.
- 7.53. CLP policy H6 outlines that the Council will aim to minimise social polarisation and create mixed, inclusive and sustainable communities by seeking high quality accessible homes and by seeking a variety of housing suitable for Camden's existing and future households, having regard to household type, size, income and any particular housing needs. The policy goes on to state that Camden will "*seek to secure high quality accessible homes in all developments that include housing. They will:*
- a. encourage design of all housing to provide functional, adaptable and accessible spaces;*
  - b. expect all self-contained homes to meet the nationally described space*

*standard;*

*c. require 90% of new-build self-contained homes in each development to be accessible and adaptable in accordance with Building Regulation M4(2); and*

*d. require 10% of new-build self-contained homes in each development to be suitable for occupation by a wheelchair user or easily adapted for occupation by a wheelchair user in accordance with Building Regulation M4(3).*

7.54. In accordance with policy H6, the Applicant has endeavoured to meet the standards of inclusive design in the different areas, creating an inclusive environment that facilitates use by a large variety of people. This has been achieved by;

- Approaches, communal circulation and interiors of the dwellings are designed to at least meet the required category of housing, with 90% meeting M4(2) and 10% M4(3) standards. These standards are exceeded in some parts, including the communal residential corridors, which are a minimum of 1500mm wide; this exceeds the 1200mm required by Part M.
- The spaces in all the dwellings facilitate use by a variety of users including disabled people as well as those with infants by exceeding the Technical Housing Standards Nationally Described Space Standards.
- At least one space for a mobility scooter is provided in the design. This has space adjacent allowed for transfer from a wheelchair.

7.55. Each apartment has an outlook to either Bedford Passage or Tottenham Mews, avoiding single aspect units facing west towards Middlesex House.

7.56. The dwellings will comprise a proportion of 10% (or 2 units) designed as wheelchair accessible units. The remainder (21 units) will meet Building Regulations Part M M4(2) standards (Category 2).

- 7.57. The ground floor apartments include a privacy zone towards the pavement, accompanied by a 1.1m high balustrade for further privacy. A low-level planter cill between the windows and balustrade enable the installation of green planting.
- 7.58. Please refer to the Design and Access Statement for further details on the accessibility of the residential units.

### ***Affordable Workspace***

- 7.59. The NPPF (2019) at Chapter 6 seeks to provide policies that contribute towards building a strong, competitive economy. Paragraph 80 states that Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. It is stated that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.
- 7.60. The London Plan promotes and supports the provision of affordable workspace. It does not, however, specify the percentage quantum of new development that should be affordable workspace, nor the rate at which it should be priced. It is delegated to the local authority to decide on such matters.
- 7.61. London Plan (draft) Policy E3: also promotes and supports the provision of affordable workspace but does not specify the percentage quantum of new development that should be affordable workspace, nor the rate at which it should be priced. Similarly, to the current London Plan, these decisions are delegated to the local planning authority.
- 7.62. CLP Policy E2 states that 'higher intensity' redevelopment, e.g. medium and major scale office-based developments must: *"include floorspace suitable for start-ups, small and medium-sized enterprises, such as managed affordable workspace where viable;"* (part f.) The LBC policy position is similar to the

London Plan in the respect that it does not specify an explicit quantum of floorspace that is required to be set at affordable rates within their local plan.

- 7.63. Camden Planning Guidance Employment Sites and Business Premises (2018) acts as a planning guidance document, which is supplementary to the Camden Local Plan. Within this document it is stated that LBC will: *“Seek to use planning obligations to secure an element of affordable SME workspace from large scale employment developments with a floorspace of 1,000sqm (GIA or gross internal area) or more. The cost per square foot or per workstation that would be considered affordable will vary according to a range of factors such as location, type, quality, etc.”*
- 7.64. The principle of developing part of this site to deliver the affordable workspace requirements for the Network building under policy E2 is considered acceptable in principle.
- 7.65. The affordable workspace is located within the ground floor and basement, with entrances from Bedford Passage and Tottenham Mews. The Applicant is proposing 375sqm. Due to the viability of bringing forward both sites together, the proposed is the maximum amount that can be provided. The application is supported by a Financial Viability Assessment prepared by DS2.

### ***Design***

- 7.66. This planning statement addresses the land use context of the proposed development, showing how the proposal will meet the land use objectives for the site and complement existing land uses in the area. The Design and Access Statements accompanying the planning application provides an analysis of the constraints and opportunities presented by the site and how the design of the proposed development has evolved and responds to these. It sets out the design objectives, urban design principles and building design principles which have informed the final design of the proposals.

- 7.67. Chapter 12 of the NPPF (2019) concerns the achievement of well-designed places. It advises that the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve.
- 7.68. Paragraph 131 provides that in determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.
- 7.69. The adopted London Plan (2016) requires all buildings and structures to be of the highest architectural quality, and be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm. Buildings, especially tall ones, should not cause unacceptable harm to the amenity of surrounding land and buildings. Buildings should provide high quality indoor and outdoor spaces and integrate well with the surrounding streets and open spaces. Buildings should optimise the potential of sites.
- 7.70. Local Plan policy D1 outlines that the Council will seek to secure high quality design in development. The Council will require that the “development:
- a. respects local context and character;*
  - b. preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;*
  - c. is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;*
  - d. is of sustainable and durable construction and adaptable to different activities and land uses;*
  - e. comprises details and materials that are of high quality and complement the local character;*
  - f. integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;*
  - g. is inclusive and accessible for all;*

- h. promotes health;*
- i. is secure and designed to minimise crime and antisocial behaviour;*
- j. responds to natural features and preserves gardens and other open space;*
- k. incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping,*
- l. incorporates outdoor amenity space;*
- m. preserves strategic and local views;*
- n. for housing, provides a high standard of accommodation; and*
- o. carefully integrates building services equipment.”*

The Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.

- 7.71. The proposed design has been developed from April 2018 throughout to November 2020 and has been discussed with officers from London Borough of Camden, Camden Design Review Panel, and potential Registered Housing Providers. The resultant scheme provides a robust, elegant masonry-clad building which completes the mews with materials that suit the surroundings.
- 7.72. 14-19 Tottenham Mews provides a fantastic opportunity to create much needed affordable accommodation on a calm mews street within a central part of London. The vacant site lends itself to a new, high-quality building which will complete the street and complement its immediate surroundings.
- 7.73. The proposal consists of a ground plus 6-storey building above with a single basement. The mass is broken down with two setbacks at upper levels along Tottenham Mews. The first set-back on the 4th floor takes the shoulder height of the neighbouring buildings. A further setback is introduced at 5<sup>th</sup> floor level



to reduce the impact from ground level. The 5th floor is also set-back on the south and north perimeter.

7.74. In accordance with CLP policy D1, the proposed development will provide:

- Active uses on the ground floor which will improve community security along the mews, continued from the upcoming development at Arthur Stanley House.
- Permeability along street frontages to enhance community security and visual interest along the mews.
- A pedestrian link to Bedford Passage is a key element to the proposals. This creates permeability, promotes wellbeing, and improves public realm by creating a through-route to a currently dead-end mews street.
- Borrowing from the local vernacular to create a facade that suits its surroundings, in terms of materiality and fenestration grids. The facade is further broken down at ground level to reflect the traditional mews street frontages opposite.
- A robust, warm-toned material palette to complement the immediate surroundings, adding to the rich variety of masonry and materials already apparent in the local vernacular and the upcoming developments on the mews.
- An accessible development in accordance with technical design standards.
- Incorporating low level planter cill between the windows and balustrade enable the installation of green planting.
- Reduction of operational energy performance will be reduced via passive design measures and incorporation of efficient technologies to provide affordable homes in operation.

### Public Realm

- 7.75. London Policy 7.6 states that architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context.
- 7.76. Policy T1 of the Local Plan states that the council will promote sustainable transport by prioritising walking, cycling and public transport in the borough. In order to promote walking in the borough and improve the pedestrian environment, they will seek to ensure that developments improve the pedestrian environment by supporting high quality public realm improvement works.
- 7.77. Policy A2 states that the Council will protect, enhance and improve access to Camden's parks, open spaces and other green infrastructure.
- 7.78. The FAAP sets out its priorities for the site and seeks as part of any development the creation of a pedestrian link between Tottenham Mews and Bedford Passage.
- 7.79. At the moment, there is no access from Tottenham Mews through to Bedford Passage which runs across east west along the southern edge of the Middlesex Annex Hospital site to the north.
- 7.80. In accordance with policy and the priorities set out in the FAAP, the proposed development provides a link to Bedford Passage. The pedestrian link to Bedford Passage is a key element to the proposals. This creates permeability, promotes wellbeing, and improves public realm by creating a through-route to a currently dead-end mews street.
- 7.81. The passage, cantilevered over by the proposed building, will be well lit, with windows facing it from the affordable workspace to enhance security and to

prevent anti-social behaviour. The entrance to the passage is further detailed with glazed brick corners, and a reflective, ceramic ceiling to light up the space.

- 7.82. The design teams aim is to create a comfortable, safe and usable passage that vastly improves and enhances the existing public realm of the streets.

### **Heritage**

- 7.83. National planning guidance on the historic environment is provided by the NPPF. It defines what constitutes the historic environment, including 'heritage assets' (which can be designated or undesignated), and sets out the policy approach to assessing development proposals which affect heritage assets either directly or in terms of their setting.
- 7.84. Designated heritage assets include World Heritage Sites, listed buildings and conservation areas among other designations.
- 7.85. Chapter 7 focuses on policies relating to the built environment, both the historic built environment and new development. These policies have been taken into careful consideration in the formation and assessment of these proposals. Of particular relevance are Policy 7.1 Lifetime neighbourhoods, Policy 7.2 which promotes the highest standards of accessible and inclusive design and Policies 7.4 and 7.5, which protect local character and public realm. Policy 7.6 which makes provision for the highest architectural quality (7.6Ba) and requires that architecture should make a positive contribution to the city (7.6A).
- 7.86. Policies 7.8 to 7.10 consider the Historic Environment, 7.8C states that 'development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail' (p.287). Paragraph 7.31 expands on the Policy 7.8, stating that:

*“Heritage assets such as conservation areas make a significant contribution to local character and should be protected from inappropriate development that is not sympathetic in terms of scale, materials, details and form. development that affects the setting of heritage assets should be of the highest quality of architecture and design and respond positively to local context and character.”*

- 7.87. Intend to Publish London Plan policy HC1 States that heritage conservation and growth will replace Policy 7.8 of the adopted London Plan (Ref 1-7) and states that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets’ significance and appreciation within their surroundings.
- 7.88. Camden Local Plan Policy D2 (Heritage) outlines that the Council will preserve and, where appropriate, enhance Camden’s rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets. The policy goes on to state that the Council *“will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings...”* The policy also goes on to state that *“in order to maintain the character of Camden’s conservation areas, the Council will require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area... resist development outside of a conservation area that causes harm to the character or appearance of that conservation area; and preserve trees and garden spaces which contribute to the character and appearance of a conservation area or which provide a setting for Camden’s architectural heritage.”*
- 7.89. The existing building is an unlisted building located in the Charlotte Street Conservation Area in the LBC. The building is considered by Camden to detract from the Charlotte Street Conservation Area and therefore the loss of this building would cause no harm to the character and appearance of the

conservation area. The demolition of this building has recently been granted by LBC in November 2020 reaffirming the principle of its demolition. While situated in a relatively concealed mews location, the building and site is within the wider setting of a number of listed buildings including the Former Strand Union Workhouse (Grade II); 39 Tottenham Street (Grade II); and the BT Communication Tower (Grade II). Due to the location and enclosed nature of the mews the building has no impact on the setting of the other nearby listed buildings; the Former Strand Union Workhouse (Grade II) and 39 Tottenham Street (Grade II).

7.90. A Historic Building and Townscape Report has been prepared by Donald Insall who have undertaken an assessment of the proposals against its impact on the conservation area and the setting of heritage assets. The report confirms that the design of the proposals would have a positive impact on the Charlotte Street Conservation Area, as well as on the setting of the non-designated heritage assets that form part of the mews and the setting of the Grade II listed BT Tower, seen in views north. The high quality and considered architecture of the façade and its appropriate detailing would contribute to the light industrial character of the predominantly 19<sup>th</sup> century mews and the rich and varied nature of the local townscape. The report goes on to state that the “ *high quality design of the new building and its increased massing, mitigated by its stepped form, coupled with its more appropriate materiality and cohesive and considered design, would be an enhancement and would have a positive impact on the Charlotte Street Conservation Area and the setting of nearby heritage assets, most notably the wider setting of the Grade II listed BT Tower.*”

7.91. The proposed development comprising a significant amount of affordable housing and associated public benefits would accord with Sections 16, 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act and with the relevant policies of the NPPF, particularly paragraphs 193 and 200. The proposals would also align with the relevant policies of Camden Council’s Local

Plan, notably D1 Design and D2 Heritage and are therefore considered to be acceptable in heritage terms.

### **Townscape**

- 7.92. An assessment of the impact of the proposals on local and strategic views is provided in the accompanying 'Historic Building Report and Townscape and Visual Impact Assessment' prepared by the Donald Insall.
- 7.93. The London View Management Framework (LVMF) designates, protects and manages twenty-seven views of London and some of its major landmarks. Policy 7.11, London View Management Framework, of the London Plan, identifies that the Mayor has designated a list of strategic views that he will keep under review. These views are seen from publicly accessible and well used places. They include significant buildings or urban landscapes that help to define London at a strategic level. Within the views, the Mayor will also identify and protect aspects of views that contribute to a viewer's ability to recognise and to appreciate a World Heritage Site's authenticity, integrity, significance and Outstanding Universal Value.
- 7.94. Policy D1 outlines that the Council will seek to secure high quality design in development and will require that development "*preserves strategic and local views.*"
- 7.95. The proposed building is not visible in the protected views defined in the London View Management Framework, nor is it located in any locally identified and protected Townscape Views. Local views on which to base this townscape assessment have been chosen based on visibility of the site and with consideration for the setting of nearby conservation areas and listed buildings and in consultation with Camden Council.

7.96. The site forms part of the wider setting of a number of listed buildings. However due to the nature of the existing townscape and the enclosed nature of Tottenham Mews the site is only visible from within Tottenham Mews and partially from Bedford Passage to the rear and so has no impact on the setting of these listed buildings. The site does have an impact on the setting of the BT Tower (Grade II) in views from Tottenham Mews looking north and northeast. In these views the current building at 14- 19 Tottenham Mews detracts from its setting.

7.97. 5 townscape views have been assessed in total. The views are as follows:

View Number	Viewing Position
V01	Tottenham Street, looking north
V02	Tottenham Mews, looking northwest
V03	Tottenham Mews, looking south
V04	To the rear of 13 Tottenham Mews, looking west
V05	Bedford Passage, looking east

7.98. As set out in the accompanying report, in summary, view 1 is within the Charlotte Street Conservation Area and the townscape effects would be minor, beneficial based on what is visible and can be assessed in the view. Views 2, 3 and 5 are also set within the conservation area and the effects on the townscape and view would be major, beneficial. View 4 is located just outside the boundary of the Charlotte Street Conservation Area and the effects would once again be major, beneficial. There is considered to be no adverse effects which would require mitigation.

7.99. Donald Insall outline that where the proposals are visible in views around the site and from within the Charlotte Street Conservation Area or where it is viewed within the setting of the Grade II listed BT Tower the effect would be positive and the overall effect of the proposed development on the setting of heritage assets would be major beneficial.

- 7.100. The Historic building and Townscape report concludes that the proposals would *“cause no harm to designated and local townscape views and would make a positive contribution to their setting. It is therefore considered that the proposals, which would provide public, environmental, social and economic benefits, would accord with the relevant policies of the NPPF, namely paragraphs m193, 197 and 200, and the stipulations of the Planning m(Listed Buildings and Conservation Areas) Act 1990, paragraphs 16, 66 and 72.”*

#### **Transport, Servicing and Refuse**

- 7.101. Paragraph 103 of the NPPF states that the planning system should actively manage patterns of growth, focussing significant development on locations which are or can be made sustainable, to limit the need to travel and offer a genuine choice of transport modes. Paragraph 111 requires developments that will generate significant amounts of movement to provide a Travel Plan and a Transport Assessment, so that the likely impacts can be assessed. Paragraph 110 states that applications for development should give priority to pedestrians and cycle movements, both within the scheme and with neighbouring areas, and second – so far as possible – facilitate access to high quality public transport, with layouts and appropriate facilities that encourage public transport use.
- 7.102. Policy 6.3 of the London Plan (2016) states that *“development proposals should ensure that impacts on transport capacity and the transport network, at both a corridor and local level, are fully assessed. development should not adversely affect safety on the transport network.”*
- 7.103. Camden Local Plan 2017 Policy T1 – Prioritising walking, cycling and public transport states: *“The Council will promote sustainable transport by prioritising walking, cycling and public transport in the borough”.*



7.104. Policy T2 – Parking and car-free development states “The Council will limit the availability of parking and require all new developments in the borough to be car-free.” The Council aims to:

- a) Not issue on-street or on-site parking permits in connection with new developments and use legal agreements to ensure that future occupants are aware that they are not entitled to on street parking permits;*
- b) Limit on-site parking to i. spaces designated for disabled people where necessary, and/or ii. essential operational or servicing needs;*
- c) Support the redevelopment of existing car parks for alternative uses; and*
- d) Resist the development of boundary treatments and gardens to provide vehicle crossovers and on-site parking*

#### **Access**

7.105. Access to the site will be taken directly from Tottenham Mews, in a similar manner to other properties within the Mews. Vehicle access into the site will not be possible, with all deliveries to be undertaken from sections of single yellow line kerbside within Tottenham Mews.

#### **Car Parking**

7.106. In accordance with CLP the proposals will not provide any on-site car parking spaces. This car-free approach is considered appropriate given the spatial constraints of the site and the highly accessible location of the site within central London (as evidenced by the PTAL rating of 6b).

7.107. Disabled car users will be expected to make use of on-street parking bays in the local area, such as the three parking bays available on Tottenham Street circa 45 metres from the site. This approach has been taken given the scale of the residential and office space proposed and the spatial constraints of the site in delivering such a provision.

#### **Cycle Parking**

- 7.108. Cycle parking will be provided for all site uses in line with the draft new London Plan standards. The residential units will be provided with a dedicated cycle store, located at basement level and accessible via lift or stairs, providing cycle parking for 44 cycles, in the form of 2-tier cycle stands.
- 7.109. The workspace element of the site will be provided with a dedicated cycle store at ground floor level adjacent to the office space, with space for 6 cycles to park through the provision of 2-tier cycle stands.
- 7.110. In addition, provision for larger-adapted cycles or mobility scooters will be provided at ground floor level, at grade with Tottenham Mews, enabling the parking of 2 mobility scooters or larger/adapted cycles.

### ***Servicing***

- 7.111. Deliveries to the proposed development will most commonly be undertaken by bicycle, motorcycle and small vehicles on account of the type of goods typically delivered to office and residential uses, such as couriered documents, postal mail, stationery and online shopping deliveries.
- 7.112. As set out in the accompanying transport statement, residential units generate approximately 12-15 deliveries per 100 units per day. It is anticipated that the 23 residential units will generate 2-4 deliveries per day. The expected number of deliveries to the office space has been based on evidence published by the City of London, which assumes 0.22 deliveries per 100sqm (GEA) for B1 (now Class E) office space. This evidence suggests that the proposed office space will generate circa 1 delivery per day. In total, the site is expected to receive approximately 3-5 deliveries per day, which is the equivalent of less than 1 delivery per hour across the working day.

- 7.113. The Transport Statement concludes that there will not be a noticeable impact on the local highway or public transport networks and that the development will not result in material impact in highways and transportation terms.

### ***Waste***

- 7.114. Waste will be stored within secure, separate waste stores at ground floor level, for both the office and residential uses. Waste storage for both uses has been provided in line with LBC waste storage guidance and BS 5906:2005.
- 7.115. Waste will be collected on-street, in the same manner as waste collections for neighbouring properties, which is envisaged to comprise waste collection vehicles reversing in to Tottenham Mews from Tottenham Street. Waste collection operatives will be able to collect waste directly from the stores, which are located within 10m of Tottenham Mews.

### **Energy & Sustainability**

- 7.116. Paragraph 148 of the NPPF notes that the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.
- 7.117. At paragraph 154 the NPPF states that in determining planning applications, local planning authorities should expect new development to:
1. comply with any development Plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; and

2. take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.

7.118. Policy 5.2 of the London Plan (2016) advises that development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy:

1. Be lean: use less energy
2. Be clean: supply energy efficiently
3. Be green: use renewable energy

7.119. The policy also states that the Mayor will work with boroughs and developers to ensure that major developments meet the stated targets for carbon dioxide emissions reduction in buildings. Policy 5.3 requires the highest standards of sustainable design and construction to be achieved in London to improve the environmental performance of new developments and to adapt to the effects of climate change over their lifetime. Development proposals should demonstrate that sustainable design standards are integral to the proposal, including its construction and operation, and ensure that they are considered at the beginning of the design process.

7.120. London Plan Intend to Publish Policy SI3 outlines that Boroughs and developers should engage at an early stage with relevant energy companies and bodies to establish the future energy requirements and infrastructure arising from large-scale development proposals such as Opportunity Areas, Town Centres, other growth areas or clusters of significant new development. Energy masterplans should be developed for large-scale development locations which establish the most effective energy supply options. Energy masterplans should identify:

- 1) major heat loads (including anchor heat loads, with particular reference to Sites such as universities, hospitals and social housing)
- 2) heat loads from existing buildings that can be connected to future phases of a heat network
- 3) major heat supply plant

- 4) possible opportunities to utilise energy from waste
- 5) secondary heat sources
- 6) opportunities for low temperature heat networks
- 7) possible land for energy centres and/or energy storage
- 8) possible heating and cooling network routes
- 9) opportunities for futureproofing utility infrastructure networks to minimise the impact from road works
- 10) infrastructure and land requirements for electricity and gas supplies
- 11) implementation options for delivering feasible projects, considering issues of procurement, funding and risk, and the role of the public sector

7.121. The heating and electrical demands of the proposed development will be met, whilst at the same time energy consumption and associated CO2 emissions to the atmosphere will be reduced, in accordance with the national, regional and local planning policy requirements and considering the site-specific necessities.

7.122. In total, the energy strategy will allow the proposed development to achieve up to 61% reduction in regulated CO2 emissions over the baseline, with energy efficiency measures providing 7% reduction and the proposed LZC technologies contributing additional 54% to the overall CO2 emissions reduction. As such, the proposed development will meet Draft London Plan aspirational site-wide targets for minimum carbon reduction as illustrated in Figure 7 below

7.123. A number of 'sustainable' measures will be targeted and complied with as part of the proposed development as follows;

- The scheme will target Home Quality Mark certification, balancing the carbon, social and cost elements of the assessment.
- Operational energy performance will be reduced via passive design measures and incorporation of efficient technologies to provide affordable homes in operation.

- The environmental impacts of materials will be reviewed with a life cycle assessment undertaken as part of the design development.
- Units will be designed to ensure internal water consumption does not exceed 110/p/d.
- Verification of building performance will be undertaken via post occupancy evaluation surveys once completed.
- PV's are proposed at roof level; and
- A blue roof system is proposed at 5th floor and roof levels for rainwater attenuation.

### **Environmental Impacts**

7.124. The proposed development has been assessed in terms of its potential for impacts on a number of environmental issues, which include, inter alia;

- 1) Daylight, sunlight and overshadowing;
- 2) SUDS;
- 3) Noise; and
- 4) Air quality

7.125. The accompanying environmental reports provide a full assessment of the proposals in relation to each of these matters. A brief summary of each is provided below.

### ***Daylight and Sunlight***

7.126. The basis for the technical analysis and methodology employed for sunlight and daylight and overshadowing is derived from The Building Research Establishment Guidelines entitled Site Layout Planning for Daylight and Sunlight 2011 by P J Littlefair (The BRE Guidelines).

7.127. The NPPF, at paragraph 123 (part c) 'achieving appropriate densities', states that 'local planning authorities should refuse applications which they consider

fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a Site (as long as the resulting scheme would provide acceptable living standards)'.

- 7.128. Point 2 Surveyors have prepared a daylight and sunlight analysis for the proposed development. The report assesses the daylight and sunlight effects of the proposed development on the surrounding residential properties. It also assesses the daylight internally within the scheme.

***Daylight and Sunlight to Neighbouring Properties***

- 7.129. The BRE Guidelines recommend that daylight and sunlight assessments should be undertaken in relation to any properties which might be considered to have a reasonable expectation for natural light. This would ordinarily include any residential buildings within the vicinity of the site.
- 7.130. As set out in the Point 2 report, it is almost always the case that when replacing underdeveloped sites such as this with higher density developments, there will be daylight and sunlight reductions which exceed the national advice offered by the BRE Guidelines. A rigid application of the BRE Guidelines for this site would in Point 2's opinion be at odds with the approach adopted by local authorities across London, and indeed Camden, where it is recognised that a flexible approach is required, taking into account other factors such as the context in which development takes place.
- 7.131. There is a historical consent for the site which, provides a sensible alternative baseline condition from which to consider the effects of the proposed development on the neighbouring residential properties. Whilst the 2012 planning permission is no longer extant, the intention behind the principal of

comparing new proposals to a previously approved scheme is still applicable to this site as it clearly allows a comparison to be made between the current proposals and a scheme which has previously been considered acceptable.

7.132. The technical analysis demonstrates that 95/117 (81%) of the windows assessed will adhere to the BRE Guidelines for VSC. In terms of NSL, 50/66 (76%) will adhere to the BRE criteria while finally 58/66 (88%) of the rooms assessed will adhere to the BRE Guidelines for APSH. Of the nine residential buildings included within our analysis, three will experience alterations in daylight and/or sunlight beyond guidance.

7.133. A summary and further detail behind the results is provided within the accompanying report prepared by Point 2.

#### *Internal Daylight*

7.134. Extensive pre-planning consultation has been undertaken with Camden. As a result, the design of the scheme has been subject to refinement to ensure that the proposed development incorporates the views and recommendations of officers, wherever possible, and performs as well as possible from a daylight perspective.

7.135. This site presents a number of challenges from an internal daylighting perspective. Mews locations in central London are ordinarily very tight. The proximity of Middlesex House to the rear of the Site means that any room located within the rear of the scheme have a restricted view of the sky and so daylight is compromised. Various options were explored to try to maximise the levels of daylight to these rear facing rooms however, none had a material bearing on the results.

7.136. The design has been subjected to extensive daylight testing to maximise the daylight potential within the scheme. Through the design process



modifications have been made to the facades, internal layouts and window sizes within the scheme to maximise the daylight levels.

- 7.137. Wherever possible, rooms with a lesser requirement for daylight such as bedrooms have intentionally been positioned to the rear of the scheme or in areas that receive less daylight. This design approach maximises daylight to the main habitable accommodation within the flats such as living/dining rooms, kitchen/dining rooms and LKD's, which are generally positioned within the Tottenham Mews elevation which benefits from high levels of daylight. In some instances, the bedrooms achieve lower levels of daylight in order to prioritise the daylight to main habitable spaces. Where rooms are below desirable levels, for the most part they have access to alternative habitable rooms with better opportunity for daylight amenity.
- 7.138. In total Point 2 have assessed 68 rooms within the development which includes 20 LKD's, 2 kitchen/dining rooms, one living dining room and 45 bedrooms.
- 7.139. The internal results demonstrate that 46 of the 68 rooms (68%) will achieve the suggested ADF values for their relevant room use. If you consider 1.5% as the suggested ADF value for the LKD's then this figure increases to 49/68 (72%).
- 7.140. For further information on the technical analysis please refer to the accompanying report prepared by Point 2.

### **SUDS/Drainage**

- 7.141. The existing site is located within Flood Zone 1 and is considered to be at low risk of flooding from fluvial and tidal sources. The development site area is less than 1 hectare in plan area, and not located in an area identified by the Lead Local Flood Authority as having critical drainage issues. As a result, in accordance with Paragraph 103 footnote 20 of the NPPF, a site-specific flood risk assessment is not required for planning.

- 7.142. The SuDS Hierarchy has been followed in order to employ the most suitable and practicable SuDS techniques to improve surface water run off rates from the site. The proposed development will restrict surface water run off to the public sewer to a peak discharge of 7.6l/s for the site. This provides a betterment on existing of over 63% for the 1 in 100-year event + 40% climate change event.
- 7.143. The development proposes to achieve attenuation of surface water through above ground blue roof systems only in order to avoid the need for below ground attenuation or attenuation in the basement.
- 7.144. A blue roof system over the main roof area and terraces at Level 05 will provide surface water attenuation above ground level and help restrict these areas of the site to a peak discharge rate of 1.0l/s for the 100 year + 40% climate change return period. There is a small area of the site at ground floor which cannot be attenuated above ground and it is therefore proposed to allow this area to drain freely to the sewer. Even with this free draining area, it is still possible to achieve the 50% runoff reduction requested by Camden.
- 7.145. Through the use of SuDS techniques, the surface water management of the proposed site will see a significant betterment from the existing situation.

### **Noise**

- 7.146. Hann Tucker Associates undertook an environmental noise survey and noise impact assessment in order to assess the suitability of the site for residential use.
- 7.147. Fully automated environmental noise monitoring was undertaken on 14 July to 17 July 2020 and from 21 July 2020 to 22 July 2020. Within the report prepared by Hann Tucker Associates, appropriate internal noise levels have been proposed. These are considered achievable using conventional mitigation measures. Mitigation, including the use of suitably specified glazing

and acoustically attenuated ventilation, have been recommended to reduce to a minimum the adverse impact on health and quality life arising from environmental noise.

- 7.148. The assessment concludes that the site, subject to appropriate mitigation measures, is suitable for residential development in terms of noise.

### ***Air Quality***

- 7.149. The proposed development lies within a borough-wide Air Quality Management Area (AQMA) declared by the LBC for exceedances of the annual mean nitrogen dioxide (NO<sub>2</sub>) and 24-hour mean particulate matter (PM<sub>10</sub>) objectives.

- 7.150. An Air Quality Assessment has been undertaken by Air Quality Consultants. The assessment has considered the impact of the proposed development on local air quality in terms of dust and particulate matter emissions during construction and emissions from road traffic generated by the completed and occupied development. It has also identified the air quality conditions that future residents will experience and whether or not the proposed development is air quality neutral (as required by the London Plan).

- 7.151. The construction works have the potential to create dust. During construction it will therefore be necessary to apply a package of mitigation measures to minimise dust emissions. Appropriate measures have been recommended and, with these measures in place, it is expected that any residual effects will be 'not significant'.

- 7.152. The assessment has demonstrated that the incremental changes to traffic flows on the local road network will be below recognised screening thresholds, and that the effects of road traffic on existing residential properties will be insignificant.

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- 7.153. Air quality conditions for future residents of the proposed development have been shown to be acceptable, with concentrations well below the air quality objectives across the site.
- 7.154. The building and transport related emissions associated with the proposed development are both below the relevant benchmarks. The proposed development therefore complies with the requirement that all new developments in London should be at least air quality neutral.
- 7.155. The assessment concludes that the overall operational air quality effects of the proposed development are judged to be 'not significant'. This conclusion is based on air quality conditions for future residents of the development being acceptable, and the proposals having an insignificant effect on local air quality.

## 8. PLANNING OBLIGATIONS & SECTION 106

### Draft Heads of Terms for Section 106 Agreement

8.1. This full planning application will be linked to the section 106 Agreement for the outline application for the redevelopment of the Network Building. It is envisaged that the following planning obligations will be necessary to make the developments acceptable in planning terms, subject to discussion with the Local Planning Authority

- Public realm and highway works;
- Employment and Skills Plan
- Landscape and public realm strategy
- Affordable workspace
- Delivery and servicing management plan
- Affordable Residential
- Travel plan
- Carbon Reduction
- Section 278 agreement
- Monitoring

## 9. CONCLUSIONS

- 9.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires proposals to be determined in accordance with the development Plan unless other material considerations indicate otherwise.
- 9.2. This planning statement has been prepared by DP9 Ltd on behalf of Central London Commercial Estates Limited support of a full planning application for the development of the 14-19 Tottenham Mews.
- 9.3. The planning statement has assessed the proposals against the provisions of LBC' Development Plan, supplementary planning guidance and national and regional planning policy. It is considered that the proposed development delivers significant benefits through:
- Provision of 23 new affordable homes within Fitzrovia;
  - Providing a building designed by an award-winning architectural practice which will be of a high-quality and based on a clear understanding of the site and its relationship with its context;
  - Providing significant public realm improvements by offering part of the ground level for public use, creating a link between Tottenham Mews and Bedford Passage, increasing permeability to pedestrians;
  - Active uses on the ground floor improving community security along the mews, continued from the upcoming development at Arthur Stanley House;
  - Inclusive and accessible apartments;
  - Incorporating a blue roof system over the main roof area and terraces at Level 05 will provide surface water attenuation above ground;
  - The scheme will target Home Quality Mark certification, balancing the carbon, social and cost elements of the assessment;

- Operational energy performance will be reduced via passive design measures and incorporation of efficient technologies to provide affordable homes in operation;
  - A car free development;
  - Photovoltaics at roof level; and
  - Sustainable, wellness, connectivity
- 9.4. The principle of the development accords with current and emerging planning policy and guidance. National policy, the London Plan, the Local Plan and the FAAP all seek to ensure that development achieves the highest possible intensity of use compatible with the local context in order to deliver a scale of development which makes the most effective and efficient use of land.
- 9.5. Redevelopment of this brownfield site would significantly contribute to meeting housing targets by adding 23 new affordable residential units to the existing housing stock. These homes will promote opportunity and choice for residents in ways that meet their needs and the strategic objectives for London and LBC.
- 9.6. It is considered that, on balance, the development is of an appropriate scale and form given the strategic nature of the site, and how the massing relates to surrounding context, delivering a number of important urban design and housing benefits.
- 9.7. The development has been the subject of extensive consultation with the Council, key stakeholders, and the public. This has resulted in changes to the development to take into account the comments received. This process of consultation and engagement is on-going.
- 9.8. The proposed development is generally consistent with policies contained within the Development Plan. It will deliver significant residential and wider community benefits within a comprehensive design approach that showcases

exemplary design, with the benefits of the proposed development clearly outweighing any perceived impacts.

- 9.9. For the reasons outlined above, the principle of the development is entirely consistent with the broad objectives of planning policy, in accordance with the Government's overarching objectives for sustainable growth.
- 9.10. The proposed development is acceptable in principle and should be granted planning permission.