



Quod

Planning Statement

Chalcots Estate

15 JANUARY 2021
Q080621

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1 Introduction

- 1.1 This Planning Statement has been prepared by Quod on behalf of the London Borough of Camden (LBC) ('the Applicant') in support of a full planning application at the Chalcots Estate, Swiss Cottage, NW3 ('the Site'). The application seeks approval for:

“Re-cladding of the five tower blocks (Taplow, Burnham, Bray, Dorney and Blashford) at the Chalcots Estate with a solid aluminium panel facade and associated external works, including fenestration changes and the installation of an aluminium monorail to the parapet level of each tower block and the stair core of the Blashford tower block.”

- 1.2 The site area is 1.27 ha¹ as shown on the enclosed site location plan (ref: 259493-ARUP-T0-ZZ-DR-YC-1001 Rev. 03).
- 1.3 This Planning Statement has been prepared to communicate the planning rationale for the proposals and to set out how the development meets national, regional and local planning policies.
- 1.4 The proposed development at the Chalcots Estate will bring considerable benefits to the residents of the estate and Camden generally, including:
- Addressing safety concerns – the proposed cladding and windows would achieve an A1 fire safety rating, exceeding Building Regulation requirements, helping to prevent the spread of fire;
 - Improved safety and ventilation for residents – the lower windowsill height to the living rooms and bedrooms will improve ventilation whilst reducing the risk of falling when opening the windows.
 - Provision of a high-quality design that maintains and enhances the visual appearance of the towers;
 - Improved access to the external facades via the proposed monorails for ease of maintenance; and
 - Provision of a range of sustainability benefits, including extending the lifespan of the buildings, reducing their energy consumption and improving thermal comfort and wellbeing for residents.
- 1.5 This application follows the approval of the extant permission (ref: 2018/0503/P), approved on 24 April 2018. The current proposals are largely similar to those already approved but incorporate updated details, taking into account feedback and consultation with residents. The application should therefore be read in conjunction with the extant permission 2018/0503/P in mind, which sets the precedent for the development and demonstrates that the changes to the windows and cladding are acceptable in principle.

¹ Rounded to nearest two decimal points.

1.6 Since the previous consent (ref: 2018/0503/P) there has been further design work, fire testing and engagement with the Council, potential contractors and local residents. This has positively fed into the current application proposals to improve the safety and wellbeing of residents. Further information regarding this is provided in the Planning Background section (section 2) of this Planning Statement.

1.7 In summary, the main changes and benefits are presented in **Table 1:1**.

Table 1:1 – Benefits of the proposed development

Proposed change	2018 application	2021 application	Benefits
Cladding panels	Solid aluminium Polyester Powder Coating (PPC) panels.	Solid aluminium panels in a natural anodised finish.	Achieves an A1 fire safety classification. Smooth finish to the panels is more robust, less prone to weathering and requires less maintenance.
Cladding to the Blashford stair core	Not included.	Aluminium rainscreen cladding added to Blashford stair core.	Encloses the stair core and provides fire protection. Also improves the visual appearance.
Window layout	Tilt and turn windows and adjusted windowsill heights to comply with Building Regulations.	Revised window layout with anodised finish and lowered windowsill levels to the living rooms and bedrooms.	Improvements to ventilation, fire safety classification (A1) and visual appearance. Reduced risk of falling from windows.
Maintenance rail	Not included.	Installation of a maintenance rail to the roof of each block.	Improved safety and efficiency of access to the façades for maintenance, repairs and window cleaning.

1.8 The development plan comprises the Camden Local Plan (2017), the London Plan (2016), and the emerging New London Plan ('Publication London Plan', December 2020) which carries significant weight. The application is in accordance with the development plan and therefore, in accordance with the National Planning Policy Framework (NPPF, 2019), the presumption is that such applications should be approved without delay (paragraph 11, NPPF).

1.9 The structure of this Planning Statement is as follows:

- Section 2 sets out the planning background including site description, planning history and the pre-application consultation undertaken with the Council and community;
- Section 3 describes the proposed development;
- Section 4 confirms the relevant planning policy covering the Site;
- Section 5 provides analysis of the proposals against relevant planning policies and other material considerations; and

- Section 6 draws together conclusions.

1.10 This Planning Statement should be read in conjunction with the application drawings and supporting documentation. In addition to this Planning Statement, the following information is submitted in support of the application:

- Application form, duly completed;
- Plans pack including:
 - Site Location Plan (ref: 259493-ARUP-T0-ZZ-DR-YC-1001 Rev. 03);
 - Existing and proposed floor and roof plans;
 - Existing and proposed elevations;
 - Proposed part-elevations;
 - Existing site sections;
 - Proposed site sections;
 - Proposed typical cladding and glazing sections;
- Design and Access Statement (DAS), including specification details of the proposed materials and photographs showing the relationship of the proposed development to the surrounding area, prepared by Arup;
- Construction Management Plan (CMP); and
- Requisite planning application fee.

2 Planning Background

The site and surrounding area

- 2.1 The Chalcots Estate lies in the Haverstock ward of LBC, north of Regents Park and between Finchley Road and Chalk Farm in Swiss Cottage.
- 2.2 The application site comprises five tower blocks (four 23-storey blocks (Taplow, Burnham, Bray, and Dorney) and one 19-storey block (Blashford)). The application site boundary extends beyond the footprint of the tower blocks to include land up to the public highway to show how the site will be accessed during the construction phase.
- 2.3 The four 23-storey towers are identical in plan, with three wings arranged around a circulation core. The wings are offset from one another creating a slot recess in the mass of the elevation to allow natural daylight into the core and the Automatic Opening Vents (AOVs) to ventilate directly to the outside. The ground and first floors of the four towers are faced in a brick outer skin with window openings. The 2nd to 22nd floors were clad in alternate vertical strips of rainscreen cladding or inset grey-framed glazing and spandrel panels in 2006-2009. The removal of this cladding began in September 2017.
- 2.4 The fifth tower, located to the south of the Adelaide Road and the mainline to Euston, is 19 storeys high above the ground floor slab level, which is connected to the street by a series of bridges. Prior to taking down the cladding it was arranged in alternate vertical strips of rainscreen cladding and glazing/spandrel panels on the outer facing elevations, but the corners were glazed. The solid elements of the façade ran past the top of the uppermost spandrel panel by 2 metres and the communal core and lift overruns protrude above the finished level of the cladding at roof level.
- 2.5 The Chalcots Estate has good public transport access with five stations located within a 15-minute walk (Swiss Cottage, Chalk Farm, Belsize Park and Finchley Road underground stations and South Hampstead rail station). The PTAL rating for the Site ranges from 1a to 5.
- 2.6 The Site is not located within a conservation area but is adjacent to the Belsize Conservation Area to the north, approximately 120m at its closest point from the Elsworth Conservation Area to the south, and approximately 170m at its closest point from the Eton Conservation Area to the north-east. Primrose Conservation Area is slightly further away to the south-east of Blashford.
- 2.7 There are a number of listed buildings nearby the Site. The Grade II listed houses (13, 31, 37, 39, 43, 45, 57, 59, 61, 63, 65, 69 and 73) on the south side of Eton Avenue are located approximately 90m from the Site at the closest point and the Grade II Swiss Cottage Library on Avenue Road is approximately 140m to the west to the estate.

Relevant Planning History

- 2.8 The phased development of the Chalcots Estate was granted planning permission in the 1960's. A copy of the original planning permissions is not available on LBC's online planning register. Nevertheless, the LPA's planning records show that subsequent applications for

alterations and refurbishments to the Chalcots towers have been made in the period since the original permission was granted.

- 2.9 Five full planning applications (2003/3489/P, 2003/3488/P, 2003/3490/P, 2003/3492/P and 2003/3491/P) for alterations and refurbishment including recladding were submitted on behalf of Partnership for Improvement in Camden Ltd in December 2003 and approved in June 2004. The works approved under these applications were undertaken in 2006-2009.
- 2.10 In Summer 2017, LBC undertook a review of its housing stock and found that the original cladding on the towers did not meet the limited combustibility requirement for buildings where the uppermost floor is more than 18m from ground level. From September 2017, the cladding was removed, and LBC committed to achieve a higher fire safety rating in line with Building Regulations.
- 2.11 Planning permission (ref. 2018/0503/P) was granted by LBC as the local planning authority (LPA) on 24 April 2018 for:

“Replacement of windows and cladding of the five tower blocks (Taplow, Burnham, Bray, Dorney and Blashford) at the Chalcots Estate with a solid aluminium panel facade and associated external works.”

- 2.12 The key elements of the scheme were as follows:

- Recladding of Taplow, Burnham, Bray, Blashford and Dorney towers with solid aluminium PPC panels of exactly the same height, colour and texture as those taken down.
- Fire remedial works on all five towers and cladding reinstated to match existing in both material and colour.
- Installation of cleaning gantries to facilitate maintenance and cleaning to all facades.

- 2.13 A further non-material amendment (NMA) application was subsequently submitted and withdrawn for an aluminium monorail system to the parapet level of each tower to provide easy access to the external facades for maintenance purposes. The application was withdrawn amid further design changes and consultation with residents.
- 2.14 The proposals in this application are largely similar to those in the extant permission and the subsequent NMA. The latest proposals seek to address the needs of residents and combine the two proposals into one consent.
- 2.15 Following further design work, fire testing and feedback from residents, LBC has committed to a gold standard of safety at the Chalcots Estate, in line with the Fire Safety Bill 2019-2021, and seeks to achieve an A1 fire safety rating, exceeding Building Regulation Requirements. More information can be found in Section 3.

Fire Safety

- 2.16 Following the Grenfell fire in June 2017 a programme of national testing of various cladding systems highlighted the significant risks of aluminium composite material (ACM) cladding when used on the façade of high-rise residential buildings. LBC immediately took steps to assure the

safety of its buildings. Following information provided by the Department of Communities and Local Government (DCLG), LBC sent sample cladding from the Chalcots towers to the Building Research Establishment (BRE) on 21 June 2017. Based upon the outcome of the Government testing the applicant sought to remove the cladding as quickly as possible.

- 2.17 Subsequently four of the five blocks (Taplow, Burnham, Bray and Dorney) were evacuated after investigations by the London Fire Brigade (LFB) and Enforcement Notices were issued on 12 July 2017. A schedule of works was provided by the LFB to LBC that were required to be completed in order for residents to return to their homes. The applicant worked in conjunction with the LFB who checked the works and advised in July 2017 that it was safe for residents to return. Independent Building Control Officers authorised the sign off of the work on a floor-by-floor basis and residents were able to return to their homes by 24 July 2017. Confirmation of completion of the work required by the Enforcement Notices was formally received by the LFB on 20 November 2017.
- 2.18 Further mitigations were required prior to the cladding removal in September 2017. Fire Wardens were posted on each floor of the blocks while the remedial works were being completed. In the evacuated blocks this was reduced to a roaming patrol with one warden based on 2-3 floors 24 hours a day while the cladding was still in place. The applicant carried out additional works to improve resident safety in the blocks, including; fitting new front entrance doors for all flats with 60-minute fire protection and additional smoke alarms and heat detectors, as well as fire and personal appliance testing (PAT) for white goods and other items in all households.
- 2.19 The applicant committed to removing the cladding (which included both the ACM tile and rockwool insulation) from all five blocks, as well as committing to the works to achieve Class A1 fire rating which exceeds the current requirements of the building regulations (as defined in Approved Document B 'Fire Safety' – a guidance document to ensure compliance with Building Regulations). Works to secure the structure of the blocks started in September 2017, and Camden has now completed the removal of the previous cladding system across all five blocks at the Chalcots Estate in Belsize ward. Following the removal of the panels and investigation into the cladding, it was found that the window systems were also inadequate, therefore it was decided to replace these concurrently.
- 2.20 Since the approval of the extant permission, the previously approved PPC cladding finish has been changed to an anodised finish. The anodised panels will achieve the A1 Reaction to Fire classification that LBC has committed to, over and above regulatory requirements. In addition, aluminium rainscreen cladding has been added to the Blashford stair core to provide fire separation and improve the visual appearance.
- 2.21 Each of the four identical towers will include Automatic Opening Vents (AOVs) and louvres to meet a structural fire resistance of 120 minutes. These would replicate the existing vents and louvres, and would not result in a change in appearance to the four identical towers. On the Blashford Tower south elevation the louvres would be moved from the left to the centre of the façade, but are the same as existing in all other respects. Stainless steel flues will replace the existing plastic gas flues as part of the façade refurbishment of all five blocks. Please see the Design and Access Statement (DAS) for more information.

- 2.22 The proposed system was tested during the summer of 2019 and was found to pass the requirements of British Standard 8414. Unlike the original ACM panels, the solid aluminium also does not possess component parts. It is therefore more robust, will not delaminate over time and will require less maintenance.
- 2.23 The results of the fire testing (one for the four identical towers and one for Blashford) is included at **Appendix 1**.
- 2.24 A fire safety strategy has been prepared for each tower block, which form the basis for the design and materials chosen. The Fire Safety Strategies for Blashford Tower and Taplow Tower (as an example of the four identical towers) are included at **Appendix 2**.

Pre-application Consultation

Pre-application consultation with LBC as the local planning authority

- 2.25 In September 2020, a meeting was held with Richard Limbrick of LBC's Regeneration and Planning department to discuss the latest proposals for the Chalcots Estate.
- 2.26 The pre-application letter to the LPA detailed that the new scheme is largely the same as the approved scheme with an almost identical cladding arrangement but in natural anodised aluminium panels to achieve an A1 fire rating. Changes to the window design were also incorporated, following consultation with the residents, together with the inclusion of the monorail system to each tower from the previous NMA application.
- 2.27 All of the changes (summarised below) are intended to improve the overall safety of Chalcots Estate.
- Cladding panels:
 - Layout and jointing to accommodate 2 sets of cavity barriers.
 - Anodised finish to cladding panels to achieve an A1 fire safety rating.
 - Cladding and closure of apertures to the Blashford stair core to provide fire separation and improve the visual appearance.
 - Windows:
 - Dropped sill levels to reduce the risk of falling from opening windows to living rooms and bedrooms whilst improving ventilation to prevent overheating.
 - Revised window layout to remove some transoms where possible to improve visual appearance and views out.
 - Anodised finish to window profiles achieve A1 classification.
 - Brickwork level adjusted to suit the revised sill levels.
 - Access and Maintenance

- Addition of a monorail system to improve the safety of access for maintenance, repairs and twice-a-year window cleaning.

2.28 A copy of the submitted pre-application material is included at **Appendix 3**.

2.29 Feedback during the meeting and at a subsequent site visit was positive and no concerns were raised regarding the proposals. Consultation with the local community was discussed in light of the ongoing social distancing requirements due to COVID-19. Mr Limbrick confirmed that online presentations with residents of the Chalcots Estate and neighbouring roads would be acceptable, particularly as the application is a re-submission for revised details of an extant permission.

Pre-application consultation with local community

2.30 On 25 and 26 November 2020, two online presentations were held with the local community, each including a question and answer session. In addition to Quod, Arup (lead architects) and Camden Council were present. Letters containing information about the proposals in brief, and advertising the presentations, were sent to residents of the Chalcots Estate and the neighbouring roads in advance.

2.31 The presentations, undertaken via Zoom, walked residents through the proposed changes from the extant scheme, the reasoning behind the changes, and their associated benefits. It also presented views of the proposed development from around the surrounding area.

2.32 Queries raised from residents included what the planning application process involved and how residents could be involved. All residents were advised that they would be consulted on the application by the LPA and have a minimum of 21 days to make any representations.

2.33 A copy of the consultation material circulated to residents of the Chalcots Estate and neighbouring local residents is included at **Appendix 4**.

2.34 The key questions and answers from both sessions are listed below.

Which windows will have a lower window sill?

2.35 Only the main window in the lounge and the bedroom windows will be larger with a lower sill to ensure safety and improved ventilation with a tilt and turn inwards opening mechanism. The windows in the bathroom, WC, kitchen and the side window in the lounge do not require a lower sill because these will be tilt only inwards opening windows.

Can the new radiator be positioned where it is currently, even with a lowered window sill?

2.36 The new radiator is likely to be fitted under the new window sill in lounge and bedrooms. The radiator must remain under the sill level to ensure safety and a guarding level of 110cm from step to window opening. The radiators must be performing adequately for the size of the rooms. The specifications will be shared with residents once available.

Can the window sill to the lounge side window be lowered?

2.37 It could be lowered to fit a tilt and turn inwards opening window. However, residents have fed back that this would take away a further part of the wall where no furniture could be placed.

Moreover, the ventilation target levels are achieved with the main window opening inwards in tilt and turn position as desired. It is therefore not considered that the substantial additional cost and disruption to lower the window sill to the side window is justified.

How will any material be removed?

- 2.38 The successful contractor must comply with LBC's objectives to minimise disruption to residents. It is envisaged that as much of the work as possible is carried out from the outside, and that dust and dirt is kept to a minimum as far as practicable. It is expected that any removal of materials is done from the outside. All of these aspects are key to the contractor selection process and will be defined once the new contractor is in place.

Will the new cladding reflect sunlight?

- 2.39 The cladding system has a 20 cm rockwool insulation with panels that are hook on cassettes made of 4mm aluminium with an anodised matt and warm coloured finish. Sunlight will not reflect from the panels but will give the buildings a light and warm colour.

What does the new cladding look like?

- 2.40 There are sample panels installed at Bray Tower towards Fellows Road to weather test the three different anodised finishes. Looking onto Bray tower from Fellows Road, the samples include three finishes:
- a. The finish to the left: This is the preferred option, an anodised warm silvery colour with a matt finish.
 - b. The finish to the middle: This is the textured finish and the weather testing confirms that this finish is more sensitive and leaves streaks and stains over time.
 - c. The finish to the right: This is a matt finish, but less warm with a more silvery appearance.
- 2.41 For more detail, please see page 24 of the DAS.

Will traffic management be mindful of other development projects in the vicinity?

- 2.42 Routes will be devised to minimise disruption where possible and other projects and restrictions in the vicinity will be taken into account.
- 2.43 For more information, please refer to the Construction Management Plan (CMP), including a Traffic Management Plan (TMP), which manages the movement of construction traffic and deliveries to and from the towers.

What is the construction management plan?

- 2.44 The new contractor must adhere to the standards and requirements set out by LBC in the CMP. Whilst some disruption is inevitable with all construction projects, LBC are committed to minimising disruption where possible. The CMP includes details of the proposed hours of construction and a TMP, which details the routing of vehicles in such a way that major cycle routes, local schools, offices and public buildings will be avoided where possible.

2.45 Following the public presentations, LBC issued a newsletter to residents on 18 December which included signposting to a recording of the webinar and FAQs on Camden Council website: <https://www.camden.gov.uk/chalcotsestate>

Additional consultation with residents

2.46 In developing the latest proposals there has been regular correspondence between LBC and the residents of Chalcots Estate, in addition to the online presentations regarding the details in this planning application.

2.47 Resident engagement means listening to views and ideas to inform decisions and enable community development. LBC do so through informing, engaging and shaping initiatives together with residents through an inclusive approach and in many different ways.

2.48 Since June 2019 over 30 newsletter and letters (20 in the past 12 months) have been issued by LBC, reaching all residents and non-resident leaseholders. Since the impact of COVID-19 in March 2020 there have also been 16 webinars in 6 months (almost 3 webinars per month), with over 170 participants (both residents and non-resident leaseholders).

2.49 This has been augmented by the use of information screens in the towers to provide updates, urgent information, sign-posting to services and contact details, and to advertise events. This provides immediate updates to all residents, whilst additional meetings, design sessions and workshops have been held throughout the year residents and representative groups for each tower.

2.50 The Tenant Resident Associations (TRA) for each of the five blocks and the Chalcots Working Group (CWG), concerned with major work proposals at the Chalcots Estate, both met regularly with LBC prior to restriction due to COVID-19 (2 hour meetings with 20 to 30 residents in attendance per meeting). Since the outbreak of COVID-19, meetings were no longer possible in conventional settings but LBC was able to resume meetings with representatives from the five tower blocks via webinars.

2.51 The webinars are in two parts:

- a presentation relating to the theme of the webinar meeting; and
- a question and answer session.

2.52 All participants are being brought into the meeting and can chose to have their camera on or not and can ask questions verbally or in the comment box.

2.53 Over the last six months all Chalcots residents were at least given the opportunity to participate in webinar meetings, and a total of over 170 residents took up that opportunity to engage with LBC in this way.

2.54 All residents, including resident representatives obtain the newsletters and webinar meeting invitations. In addition to this, LBC e-mails all resident representatives with webinar meeting details prior to each webinar.

2.55 One outcome of this engagement is that involving residents in the procurement process is essential. A resident procurement panel will be set up to make sure LBC informs residents of

the procurement requirements including the key objectives for residents about method of work, code of conduct, etc. This means that there will be two resident panels, the procurement panel (from February 2021) and then the contract monitoring panel (from July 2021).

- 2.56 A recent resident led survey indicated great interest to participate in the procurement panel and that LBC's information provision is well received.
- 2.57 LBC Officers will continue to keep the residents updated throughout the planning process.
- 2.58 A copy of the consultation material for the proposed window design, including technical and committee reports, is included at **Appendix 5**.

3 The Proposed Development

- 3.1 The application seeks full planning permission for:

“Re-cladding of the five tower blocks (Taplow, Burnham, Bray, Dorney and Blashford) at the Chalcots Estate with a solid aluminium panel facade and associated external works, including fenestration changes and the installation of an aluminium monorail to the parapet level of each tower block and the stair core of the Blashford tower block.”

- 3.2 This section should be read in conjunction with the DAS (December 2020), prepared by Arup, and other supporting documents that accompany this application.

Cladding panels

- 3.3 The existing cladding panels were completely removed, to be replaced with solid aluminium panels in order to improve the fire safety of the building, and to improve its visual appearance. On the Taplow, Burnham, Bray and Dorney towers, all 21 storeys above brick plinth level (2nd - 22nd floor) including the roof level, where the cladding will extend to the existing parapet level, will be re-clad. All 19 storeys of Blashford tower above ground level will be re-clad including the roof level, where the cladding will extend to the top of the existing parapet.
- 3.4 The aluminium panels will be an anodised finish, rather than the PPC finished cladding panels previously approved under application ref. 2018/0503/P. The anodised panels will achieve the A1 fire safety classification that has been committed to by LBC. In addition, aluminium rainscreen cladding will be added to the Blashford stair core to provide fire separation. The proposed colouring of the cladding panels is J57S Natural Finished Anodised for all the Towers.
- 3.5 An additional joint has been added at slab level to facilitate ventilation of the rainscreen cavity and accommodate 2 sets of cavity barriers (one full fill and one open state cavity barrier). The additional joints would have only a minor effect on the overall appearance of the towers and would provide the necessary ventilation to the panels and the rain screens.
- 3.6 The appearance of the proposed cladding is shown in the submitted plans and Design and Access Statement. The material has been chosen to reflect the lighter colour of the previous cladding (now removed) with a smooth surface. This is a move away from the more silver colour previously considered, based on residents' feedback and on the samples tested.
- 3.7 Sample panels were installed at Bray Tower, facing Fellows Road, to weather test the three different anodised finishes. The samples are shown on page 24 of the DAS and include three finishes:
- a. The finish to the left: This is the preferred option, an anodised warm silvery colour with a matt finish.
 - b. The finish to the middle: This is the textured finish and the weather testing confirms that this finish is more sensitive and leaves streaks and stains over time.
 - c. The finish to the right: This is a matt finish, but less warm with a more silvery appearance.

- 3.8 A textured finish has been excluded because the samples tested showed signs of streaks from air pollution and rain after just 11 months.
- 3.9 Unlike the previous ACM panels, the proposed solid aluminium panels do not possess component parts, therefore they will not delaminate over time and will require less maintenance.
- 3.10 The key driver for replacing the cladding, together with the changes to the windows and brickwork, is fire safety. Therefore, all of the proposed elements, including the roof replacement and brickwork replacement, have been chosen as they are fire resistant.
- 3.11 The entire cladding system has been fire tested successfully, including the panels (4mm aluminium), rock wool insulation and stainless steel rails and fixings. More detail on fire safety can be found below.

Windows

- 3.12 There has been significant engagement between LBC and residents regarding the replacement windows for all of the five towers. The proposals outlined below were supported by the majority of the residents on the various options as the proposed window arrangement is the best possible solution to satisfy the twin issues of safety and ventilation.
- 3.13 The tilt and turn windows proposed in the previous consent have been retained in this application, however sill levels have been dropped in the living rooms and bedrooms to improve safety. The sills are to be dropped from 800mm above Finished Floor Level (FFL) to 200mm above FFL, whilst the window openings will remain at 1300mm above FFL. The increased height between the top of the sill and the window opening would now be 1100mm and would decrease the risk of falls should anyone stand or climb on the window sill. The option for the 90 degree opening is essential to prevent overheating, which presents a competing risk.
- 3.14 The sills have been lowered in the living room (excluding the smaller, secondary window) and bedrooms, however this wasn't possible in the kitchens, bathrooms or WC's due to the positioning of work tops, bathtubs and lavatories being too close to the windows. Tilt only windows have been provided in these rooms to ensure that the window cannot be opened wide enough to pose any safety risk.
- 3.15 Both the window types will be fitted with lock and keys which control the ability of the windows to open beyond 100mm. The tilt and turn windows will also be fitted with a key / releasable tool, self-reengaging restrictor to control the full opening position of the window, to ensure that the window only opens to full position when required.
- 3.16 As a result of the dropped sills, the level of the brickwork parapet had to be adjusted to coordinate with the new, larger window size. Transom positions and numbers have been adjusted as a result of the above changes to improve visual appearances and enhance views. An additional transom is to be added at slab level to align with the location of the fire stopping during the window replacement process. Similarly, as a result of the dropped sills, the level of the brickwork parapet has been adjusted to coordinate with the new, larger window sizes.

- 3.17 The windows are proposed to be PAN 34, Dark Bronze, to add more warmth to the facade treatment compared to the previously used dark grey. The windows will also be an anodized finish, rather than PPC in order to achieve the A1 fire safety classification.

Access and maintenance

- 3.18 Historically the buildings have been accessed externally via abseilers for cleaning and maintenance purposes. The proposals now include the addition of a maintenance rail (monorail system) to the parapet level of Taplow, Burnham, Bray, Dorney and Blashford tower blocks and the stair core of the Blashford tower block to improve the safety and speed of the maintenance process.
- 3.19 The monorail system will protrude beyond the exterior by approximately 500mm to allow the cradles to suspend, whilst support brackets will be provided at intervals of approximately 2-4m. A power winch will be attached to the monorail system which will allow the operators to position and suspend themselves at any position on the elevations of the buildings for maintenance purposes.
- 3.20 The massing and bulk of the towers will not be altered; however, the monorail system protrudes above the parapet by approximately 500mm, which will increase their perceived height slightly. The visual appearance is set out in further detail in the DAS submitted with this Planning Statement.

4 Planning Policy Context

- 4.1 This section sets out the relevant national, regional and local planning policy context, before compliance is addressed in Section 5.
- 4.2 The statutory development plan for the site comprises the Camden Local Plan (2017) and The London Plan (2016). The emerging new London Plan has reached an advanced stage with the 'Publication London Plan' (2020) recently published. It therefore also carries significant weight in the determination of planning applications within London.

National Planning Policy

National Planning Policy

- 4.3 The National Planning Policy Framework (NPPF) was published in February 2019 and replaces the previous National Planning Policy Framework, initially published in March 2012. It sets out the Government's planning policies for England and how these are expected to be applied, and it is therefore a material consideration in determining planning applications.
- 4.4 Paragraph 124 of the NPPF (2019) 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 make development acceptable to communities."
- 4.5 Paragraph 127 of the NPPF (2019) seeks planning decisions to ensure that development:
- "will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development..."
 - are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change...
 - create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users..."
- 4.6 Paragraph 128 of the NPPF (2019) expects applicants to "work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot."
- 4.7 The NPPF (2019) confirms planning plays a critical role in securing reductions in greenhouse gas emissions. Paragraph 148 seeks a low carbon future by encouraging "the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure"

National Planning Policy Guidance

- 4.8 On 6 March 2014 the DCLG launched the planning practice guidance web-based resource. National Planning Policy Guidance (NPPG) adds further context to the NPPF and it is intended that the two documents should be read together.
- 4.9 The updated Design NPPG was published in October 2019 (superseding the 2014 version), which outlines that “well-designed places can be achieved by taking a proactive and collaborative approach at all stages of the planning process” (paragraph reference 001 Reference ID: 26-001-20191001).

Regional Planning Policy

- 4.10 The regional planning policy for the Site comprises The London Plan (2016).
- 4.11 Policy 3.5 of The London Plan (2016) seeks housing developments of “the highest quality internally, externally and in relation to their context and to the wider environment...”.
- 4.12 Policy 5.3 of The London Plan (2016) expects development proposals to achieve “the highest standard of sustainable design and construction...” including but not limited to “minimising carbon dioxide emissions, including building and services (such as heating and cooling systems)” and “avoiding internal overheating and contributing to the urban heat island effect”.
- 4.13 Policy 5.4 of The London Plan (2016) “applies the principles in Policy 5.3 (of the London Plan, 2016) to existing building stock where retrofit opportunities arise” (paragraph 5.30 of The London Plan, 2016). The Mayor will support measures through the Building Regulations and other regulatory and funding mechanisms to improve the performance of London’s existing buildings.
- 4.14 Policy 7.13 of The London Plan (2016) confirms “the Mayor will work with relevant stakeholders and others to ensure and maintain a safe and secure environment in London that is resilient against emergencies including fire...Development proposals should contribute to the minimisation of potential physical risks.”

Emerging Planning Policy

- 4.15 The Mayor is preparing a new London Plan that will replace the currently adopted 2016 consolidation Plan. Consultation on the Draft London Plan (2018) took place between December 2017 and March 2018, and the Examination in Public (EiP) was held between 15 January and 22 May 2019. The report and recommendations were submitted to the Mayor on 8 October 2019, and on 9 December 2019 the Mayor released his intend to publish London Plan.
- 4.16 Following this, the Ministry of Housing, Communities and Local Government (MHCLG) wrote to the Mayor on 13 March 2020 directing that the new London Plan was not to be published due to inconsistencies with national policy and missed opportunities to promote housing delivery. MHCLG provided some Directions, which the Mayor was asked to consider and make alternative changes to the London Plan policies to address concerns raised. Following further correspondence between the Mayor and MHCLG in December 2020, the Mayor has formally approved a new London Plan, the ‘Publication London Plan’, which addresses the Directions

issued by MHCLG in March 2020 and December 2020. This Publication London Plan was sent to MHCLG on 21 December 2020 and the Secretary of State (SoS) has 6 weeks to determine whether he is content for the Plan to be formally published. In a letter to the Mayor on 24 December 2020, the SoS indicated that, aside from considering the Heathrow Supreme Court Ruling, he would not be raising any further issues with the new London Plan. A formal response is expected by 1 February 2021.

- 4.17 Once published, the new London Plan will supersede the current London Plan (2016) in full. Due to the advanced stage that the new London Plan has reached, the Publication London Plan (2020) is a significant material consideration in planning decisions and its policies are being applied in the determination of planning applications within London.
- 4.18 The Publication London Plan (2020) does not propose any changes that will have a material impact on the re-cladding proposals at Chalcots towers.
- 4.19 However, it is worth noting that, following the Grenfell fire in June 2017, additional policies have been included in the new London Plan to ensure that the fire safety of tall buildings across London is full considered and prioritised.
- 4.20 Policy GG6 (Increasing efficiency and resilience) confirms that planning and development must “create a safe and secure environment which is resilient to the impact of emergencies including fire and terrorism”.
- 4.21 Policy D11 (Safety, security and resilience to emergency) states: “Development proposals should maximise building resilience and minimise potential physical risks, including those arising as a result of extreme weather, fire, flood and related hazards.”
- 4.22 Policy D12 relates specifically to the fire safety of buildings. The policy states: “In the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety and ensure that they:...2) are designed to incorporate appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire; including appropriate fire alarm systems and passive and active fire safety measures 3) are constructed in an appropriate way to minimise the risk of fire spread.”
- 4.23 Policy D9 of the Publication London Plan (2020) relates to the development of new tall buildings and thus, is not strictly relevant to the Chalcots Estate. The policy principally seeks to define locally what constitutes a tall building and where proposed tall buildings should be located. It is not intended for the development or refurbishment of existing tall buildings. However, the policy is helpful in relation to the design of tall buildings, stating: “architectural quality and materials should be of an exemplary standard to ensure that the appearance and architectural integrity of the building is maintained through its lifespan.”

Local Planning Policy

Designations

- 4.24 The Chalcots Estate does not benefit from any site-specific planning policy designations (Camden Policies Map, July 2017). The Estate is located adjacent to the Belsize Conservation Area, approximately 121m at its closest point from the Elsworthy Conservation

Area, and approximately 170m at its closest point from the Eton Conservation Area. There are a number of listed buildings nearby the Site.

- 4.25 The Adelaide Road Private Nature Reserve, Adelaide Community Garden and the Swiss Cottage Public Open Space are located within 115m of the Chalcots Estate and identified as Open Spaces by Camden's Policies Map (July 2017). The Finchley Road Town Centre area is located to the west of the Estate, on the opposite side of Winchester Road.

Camden Local Plan (2017)

- 4.26 Good design is essential to creating places, buildings, or spaces that work well for everyone, look good, last well and will adapt to the needs of future generations. Policy D1 of the Camden Local Plan (2017) confirms the Council will seek to secure high quality design that:

- “respects local context and character;
- preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;
- is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;
- is of sustainable and durable construction and adaptable to different activities and land uses;
- comprises details and materials that are of high quality and complement the local character...”

- 4.27 The Council will preserve and, where appropriate, enhance Camden's heritage assets and their setting. Policy D2 confirms the Council “will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss”.

- 4.28 Policy CC1 of the Camden Local Plan (2017) confirms the Council will “require all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation.” Camden Council will, among other things:

- “promote zero carbon development and require all development to reduce carbon dioxide emissions through following the steps in the energy hierarchy...
- expect all developments to optimise resource efficiency”.

- 4.29 Policy CC2 of the Camden Local Plan (2017) sets out how the Council will promote sustainable design and construction. This includes “ensuring development schemes demonstrate how adaption measures and sustainable development principles have been incorporated into the design and proposed implementation”.

- 4.30 Policy A1 of the Camden Local Plan (2017) seeks to protect the quality of life of occupiers and neighbours of development. Camden Council will consider factors such as; visual privacy, outlook; sunlight, daylight and overshadowing; transport impacts; noise and vibration levels,

and; odour, fumes and dust in the protection of the amenity of “communities, occupiers and neighbours” (Policy A1).

- 4.31 Policy A2 of the Camden Local Plan (2017) seeks to protect Camden’s parks, open space and other green infrastructure by resisting “development which would be detrimental to the setting of designated open spaces”.

Camden Planning Guidance documents

- 4.32 The Council has prepared a number of Camden Planning Guidance (CPG) documents to support the Local Plan. The CPG’s cover a range of different topics including housing, sustainability, amenity and planning obligations and are read alongside the Local Plan to provide additional “material consideration” in planning decisions.

Design CPG (2019)

- 4.33 The purpose of the Design CPG guidance is to promote design excellence and outline ways in which development can achieve high quality design. The guidance sets out a number of key messages, which include ensuring the use of good quality and sustainable materials to support the design related policies of the Local Plan (2017).
- 4.34 Section 2 Design Excellence highlights the importance of high quality design, and specifically outlines that materials should be “contextual, durable and sustainable”.
- 4.35 Section 5 specifically addresses alterations to existing buildings, highlighting that alterations should always respect the surrounding character, whilst also that “the durability of materials should be considered as well as the visual attractiveness of materials”.

Energy Efficiency & Adaptation CPG (2019)

- 4.36 This guidance provides information on key energy and resource issues within the borough and supports Local Plan Policies CC1 Climate change mitigation and CC2 Adapting to climate change.
- 4.37 Section 3 Making Buildings More Efficient that all developments should seek to “reduce carbon dioxide emissions below Building Regulations through energy efficient design measures.”.
- 4.38 Section 8 Energy Efficiency in Existing Buildings outlines that the existing buildings in Camden account for almost 90% of the borough’s carbon dioxide emissions, therefore it is essential that measures are taken to improve the energy performance and sustainability of buildings during refurbishment.
- 4.39 The development plan comprises the Camden Core Strategy (2017) and the London Plan (2016). The application is in accordance with the development plan. In accordance with the National Planning Policy Framework (NPPF, 2019), the presumption is that such applications should be approved without delay (paragraph 11, NPPF).

5 Planning Issues

- 5.1 This section explains, how in the context of Section 38 (6) of the Planning and Compulsory Purchase Act (2004), the proposals accord with the statutory Development Plan, which comprises the Camden Local Plan (2017) and The London Plan (2016). As detailed above, the new London Plan (Publication London Plan 2020) also carries significant weight due to its advanced stage.

Principle of Development

- 5.2 As noted in the Report to Cabinet 6 December 2017 (see **Appendix 6**), and in the Planning Background section of this Planning Statement, there is an urgent need to replace the previous cladding façade (now removed), and undertake associated external works, on the tower blocks at Chalcots Estate following the removal of the cladding system installed 2006-2009 (which included both the ACM tile and the rockwool insulation).
- 5.3 Leaving the towers without cladding for longer than necessary will result in a number of undesirable effects, including; cold bridging and interstitial condensation leading to deterioration of internal window linings; further delays and disruption to the occupants of the towers, and additional and unnecessary costs incurred upon LBC associated with the temporary works and personnel hire.
- 5.4 The principle of the proposed recladding works is supported by LBC's Planning department, as confirmed through the approval of application ref. 2018/0503/P in 2018, which sets the precedent for this application. Pre-application discussions with LBC Planning Department have also taken place, as well as extensive consultation with the community (set out further within Section 2). The principle of development is supported by the London Plan (2016) which encourages stakeholders to work together to “ensure and maintain a safe... environment that is resilient against emergencies including fire” (Policy 7.13). It is further supported by policies in the new London Plan, which specifically require buildings to be designed which are “constructed in an appropriate way to minimise the risk of fire spread” (Policy D12).
- 5.5 The proposed cladding system and anodised windows were fire tested during the summer of 2019 and found to achieve an A1 fire safety classification, exceeding the requirements of British Standard 8414 (see **Appendix 1**).

- 5.6 The proposed re-cladding works will not have any prejudicial effect on the current resident use (Class C3) of the towers.

Design

- 5.7 The choice of cladding has been driven by the condition that the materials are “inert, meaning it resists the surface spread of flame” (paragraph 1.7 of the Report to Housing Scrutiny Committee 24 January 2018 – **Appendix 7**). The proposed cladding material achieve an A1 fire safety classification, exceeding the requirements of British Standard 8414.
- 5.8 The application proposes to replace the ACM panels and rockwool insulation with J57S Naturally Finished Anodised solid aluminium panels of the same height (floor to floor) and

texture (flat). Whereas the ACM panels were fixed (via an internal angle) to the existing curtain glazing frames, the replacement cladding will have a separate reveal panel that is fixed back to the concrete structure and not the glazing frame. This will make it easier for the glazing to be replaced in 15-20 years at the end of its product life with minimal works or disruption to the greater cladding system in line with the aims of paragraph 127 of the NPPF (2019).

- 5.9 In line with pre-application advice received from LBC prior to the previous application, the proposals emphasise the verticality of the facades and the design of the external cladding proposed has been developed to reflect, as closely as possible, the cladding taken down but with a warmer colour palette.
- 5.10 The change to the window layout would alter the appearance of the buildings to a small degree, together with the minor adjustment to the brickwork level on the lower floors of the towers. These changes are all made to improve the fire safety of the buildings and the welfare of residents, improving ventilation and reducing the risk of falling. The removal of some transoms and the lower window sill heights in the revised window layout would improve the appearance of the towers and were supported by residents as the best possible solution to satisfy the twin issues of safety and ventilation.
- 5.11 The addition of the monorail to the top of each tower will protrude past the exterior of the façades by approximately 500mm to allow a cradle to suspend from the monorail. Whilst this would result in a nominal change to the appearance at the top of the towers, the impact on the character and appearance of the estate and the wider area is considered to be immaterial.
- 5.12 It is therefore considered that the proposed changes to the appearance of the blocks would not be significant and would both respect and improve the local context and character of the area and neighbouring properties in line with the requirements of Camden Local Plan (2017) Policy D1.

Nearby Heritage Assets and Conservation Areas

- 5.13 The Chalcots towers stand adjacent to the Belsize Conservation Area and are viewable from the nearby Elsworthy and Eton Conservation Areas. The appearance of the towers will be preserved, with the key design changes comprising secretly fixed panels, horizontal joins to align with the head of the glazing and the closing piece at the window reveals. The cladding will also be a Natural Anodised Aluminium Finish which is coherent with the existing panels. These minor design changes enhance the visual appearance of the five towers. Illustrations of the proposed visual appearance of the towers are clearly set out in the accompanying Design and Access Statement. The proposals will therefore preserve and enhance the surrounding heritage assets in accordance with Policy D2 of the Camden Local Plan (2017).
- 5.14 There are no listed buildings in close proximity to the Site. The closest listed buildings to the Chalcots Estate are the Grade II listed houses (13, 31, 37, 39, 43, 45, 57, 59, 61, 63, 65, 69 and 73) on the south side of Eton Avenue, approximately 90m from the Estate, and the Grade II Swiss Cottage Library on Avenue Road, approximately 140m to the west to the Estate. The design proposals have been developed so as not to significantly alter the established appearance of the towers. We have reviewed the listing details for each of the relevant heritage assets nearby and consider that the proposed works will not have an adverse impact on their significance or setting.

Amenity

- 5.15 The installation of the solid aluminium cladding and associated external works will have no negative amenity impacts on residents of the Site or surrounding area. The proposals have been developed with consideration for the factors listed at Policy A1 of the Camden Local Plan (2017), including visual privacy, outlook; sunlight, daylight and overshadowing, as well as, critically, the building's resilience against emergencies, including fire.
- 5.16 The height, colour and texture of the proposed cladding is consistent with that of the cladding taken down from September 2017 onwards. Replacing the cladding with new clean panels with less joint lines will enhance the existing position in respect of privacy and outlook.
- 5.17 The application is accompanied by a supporting Construction Management Plan (CMP) that considers the potential transport impacts; noise and vibration levels, and odour, fumes and dust impacts arising from the construction stage of the development. The CMP would ensure amenity levels are not disrupted to an unacceptable level and confirms appropriate mitigation measures where necessary.
- 5.18 The design of the proposed external cladding has been developed to reflect, as closely as possible, the cladding taken down, whilst the revised window layout will enhance the visual appearance of the buildings. The proposals will therefore not result in any detriment to the setting of the nearby Adelaide Road Private Nature Reserve, Adelaide Community Garden and Swiss Cottage Public Open Space (Camden's Policies Map, July 2017) in line with the aims of Camden Local Plan (2017) Policy A2.

Sustainability

- 5.19 The proposed re-cladding works are not required to meet the targets for carbon dioxide reduction in buildings in full, as set out under Policy 5.2 of the London Plan (2016). The proposed works comprise an improvement to the existing situation (no cladding) and not "new development" (paragraph 5.16, London Plan (2016)).
- 5.20 The applicant has taken the opportunity to improve the fabric performance of the external cladding to minimise the energy consumption of the towers. The proposed development would improve the health of residents by ensuring the safety of their homes, including improved air tightness provided by the replacement of windows. The proposed works prioritise lower cost passive design measures in line with the requirements of London Plan (2016) Policy 5.3 and Camden Local Plan (2017) Policy CC1.
- 5.21 The applicant has incorporated "sustainable development principles... into the design and proposed implementation of the proposals" in accordance with the requirements of Camden Local Plan (2017) Policy CC2. Wherever feasible the application repairs and retains the original fabric, helping to extend the lifespan of the building. The new solid aluminium cladding provides a range of sustainability benefits, including but not limited to the ease with which the material can be reused or recycled. In addition, the installation of the monorails will facilitate easier access to the exterior of the towers for the maintenance and cleaning of all facades. Regular maintenance of the facades, made easier by the addition of the monorail, will help to increase their lifespan.

- 5.22 Sustainability will be improved by better heat gain and ventilation in the new window systems which will contribute to meeting the green agenda for the community. The proposals will ensure that the safety of residents of the Chalcots Estate is secured, which will directly contribute to their health and wellbeing and result in betterment in line with the Better Homes strategy and future proofing from the ventilation works and reduction in overheating that would reduce impact from future climate and temperature changes.
- 5.23 In accordance with the aims of London Plan (2016) Policy 5.3 the replacement insulation will perform better thermally than the insulation that was taken down. The proposed insulation is thicker thereby minimising carbon dioxide emissions and energy usage, and improving the U-value of the solid walls. The proposals therefore assist with futureproofing the towers in this regard.
- 5.24 The proposals have fully considered all relevant planning policy, regulations and guidance, as noted in Planning Policy Context chapter of this Planning Statement and are in accordance with them.

6 Conclusions

- 6.1 This Planning Statement has been prepared in support of a full planning application at the Chalcots Estate, Camden. The application seeks approval for:

“Re-cladding of the five tower blocks (Taplow, Burnham, Bray, Dorney and Blashford) at the Chalcots Estate with a solid aluminium panel facade and associated external works, including fenestration changes and the installation of an aluminium monorail to the parapet level of each tower block and the stair core of the Blashford tower block.”

- 6.2 Planning permission was previously granted for the replacement of windows and cladding of the five tower blocks at Chalcots Estate on 24 April 2018 (ref: 2018/0503/P). Since the previous consent (ref: 2018/0503/P) there has been further design work, fire testing and engagement with the Council, potential contractors and local residents.

- 6.3 Following on from the extant planning permission (ref: 2018/0502/P), this application seeks to improve the overall safety of the five tower blocks, making them each more fire resilient in accordance with the new London Plan, and in turn improving the visual appearance of the buildings. This application seeks consent for the following changes:

- Cladding panels:
 - Layout and jointing to accommodate 2 sets of cavity barriers.
 - Anodised finish to cladding panels to achieve an A1 fire safety rating.
 - Cladding and closure of apertures to the Blashford stair core to provide fire separation and improve the visual appearance.
- Windows:
 - Dropped sill levels to reduce the risk of falling from opening windows to living rooms and bedrooms whilst improving ventilation to prevent overheating.
 - Revised window layout to remove some transoms where possible to improve visual appearance and views out.
 - Anodised finish to window profiles achieves A1 classification.
 - Brickwork level adjusted to suit the revised sill levels.
- Access and Maintenance
 - Addition of a monorail system to improve the safety of access for maintenance, repairs and twice-a-year window cleaning

- 6.4 The proposals include a number of significant benefits, in particular:

- The principle of development is acceptable and strongly supported by the Government, the Mayor of London and LPA;
- The proposals will create and maintain a safe and secure environment for residents of the Chalcots Estate that is resilient against fire emergencies;
- The cladding and window design has been developed in partnership with the residents of the estate and LBC to maintain and increase the safety and wellbeing of residents, and enhance the visual appearance of the towers as well the significance and setting of the nearby Conservation Areas and listed buildings;
- The proposed works incorporate a range of safety sustainability benefits during the construction and operational phases of the development; and
- The amenity of residents of the borough has been a foremost consideration in developing the proposals, which will uphold and enhance, wherever possible, their quality of life.

6.5 The proposal therefore comprises sustainable development which complies with national, regional and local planning policy, and, in accordance with the NPPF (2019), should therefore be approved without delay.