

PLANNING STATEMENT

In respect of

Grand Union House, Camden, NW1 8NH

On behalf of

Camden Mixed Developments Ltd



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Planning Statement
2.0
March 2021

REPORT

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1 INTRODUCTION

1.1 This detailed planning application is submitted to the London Borough of Camden ('the Council') on behalf of Camden Mixed Developments Ltd ('the applicant'), for development at Grand Union House, 16-20 Kentish Town Road, London, NW1 8NH ('the site').

1.2 Grand Union House (GUH, 20 Kentish Town Road) is a four-storey building that spans the majority of the eastern side of Kentish Town Road south of the Regent's Canal. The southern-most part of the site (16 Kentish Town Road) is formed of a one storey structure. GUH is comprised of ground level car parking, two levels of offices, a retail unit and a bar. The office and bar units have recently become vacant providing a unique opportunity to regenerate the existing building to provide high quality modern accommodation, replace building elements that have come to the end of their operational life, and to enhance the building's contribution to Camden Town Centre.

1.3 Accordingly, the proposal is for the:

"Part-demolition, in-fill, re-build and upward extension to provide additional Class E office and commercial floorspace, six residential units (Class C3), new areas of landscaping and public realm."

1.4 This Planning Statement sets out the planning policies in relation to the site and assesses the proposed development against each of these policy considerations. It is accompanied by the following documents:

Report	Consultant
Application Form	RPS
Community Infrastructure Levy Form	RPS
Covering Letter Incl. Validation Tracker Schedule	RPS
Planning Statement, Incl. Affordable Housing Statement, Section 106 Heads of Terms and Employment & Training Strategy	RPS
Design & Access Statement Incl. Accessibility Statement, Visualisations & Crime Impact Assessment	6a Architects
Existing & Proposed Drawings	6a Architects
Public Realm and Landscape Report Incl. Lighting Assessment	Djao Rakitine
Acoustic Report	WSP
Air Quality Assessment Incl. Proforma	WSP
Arboricultural Report	WSP
BREEAM Pre-Assessment Report	WSP
Construction Management Plan Incl. Camden Proforma	Mace
Daylight & Sunlight Report	Point 2 Surveyors

Report	Consultant
Daylight/Sunlight Letter	Point 2 Surveyors
Employment & Training Strategy	MACE
Energy Statement Incl. Overheating Assessment and Proforma	WSP
Financial Viability Assessment Report Private & Confidential: submitted under separate cover	Savills
Fire Strategy Report	WSP
Flood Risk Assessment & Outline Drainage Strategy Incl. Proforma	WSP
Heritage Assessment	Bridges Associates
Regeneration Statement	Quod
Structural Stage 2 Report	WSP
Sustainability Statement	WSP
Statement of Community Involvement	Four Communications
Townscape and Visual Assessment	Bridges Associates
Transport Assessment Incl. Outline Construction Logistics Plan	WSP
Travel Plan	WSP
Waste Management Report	WSP
Delivery & Servicing Plan	WSP

1.5 The following section identifies key aspects of the site and its surrounding area.

2 SITE AND SURROUNDING AREA

The Site

- 2.1 The site is comprised of Grand Union House (GUH, 20 Kentish Town Road) and 16 Kentish Town Road.
- 2.2 **GUH** is a four-storey mixed use building with an extensive frontage (approximately 110 metres) onto Kentish Town Road:
- a. Ground Floor:
 - i. 50% of the building frontage is comprised of undercroft car parking (33 spaces) and 18% a ground floor loading dock. Overall, 68% of the building frontage is dedicated to car parking and loading. This level has a floor to ceiling height of ca. 5.6m, and so from street level the overall building is perceived as being four storeys in height.
 - ii. Mid-way along the ground floor frontage is an undercroft leading to a car park and service yard to the rear. It provides an exit route for cars and service vehicles, and a pedestrian route through to Sainsbury's and Camden Road. On the north side of the undercroft is a small retail (Class E) unit and on the southern side is the office entrance and reception.
 - iii. At the southern end of GUH is the entrance to a bar unit (Sui Generis), which has been vacant since April 2019. This also includes a mezzanine level which sits under the first-floor offices.
 - b. Upper Floors: Originally designed for light industrial use, the majority of the upper floors were only ever occupied as offices (Class E) and have been vacant since 2019.
- 2.3 **16 Kentish Road** is a single storey structure at the very southern end of the site. Originally designed as a creche it is currently occupied as a recreation/fitness unit (Class E).
- 2.4 Table 1 below outlines the GIA sq.m floorspace of the existing buildings by use:

Use	GIA Sq.m
Office	2,651
Retail	101
Bar	230
Recreation/Fitness	113
Total	3,095

Table 1: Existing GIA Sq.m

- 2.5 The site is in a highly accessible location in Camden town centre. It is approximately 20 metres north of the entrance to Camden underground station and is in close proximity to a number of bus stops. The site has a PTAL of 6b, the highest possible level of transport accessibility. Furthermore, London Underground intend to develop a new entrance/exit to Camden Town station opposite the site on Buck Street, which will further enliven Kentish Town Road.
- 2.6 Camden's Local Plan designates the site as secondary frontage within Camden Town Centre. GUH is allocated for employment-led development in the draft Site Allocations document.

- 2.7 Originally the site of the ABC bakery, the buildings are part of a wider 1980s mixed use development designed by the architect Nicholas Grimshaw arranged around a central car park and service yard. This 'Grimshaw campus' is designed in the 'High-Tech' style. The Sainsbury's supermarket and Grand Union Walk houses were considered by Historic England to be important examples of this architectural style and were accordingly Grade II listed in 2019. GUH was not considered to be of architectural or historic merit, and so was not listed. The campus is comprised of:
- GUH: four storey mixed use building with ground floor undercroft parking and loading dock.
 - Nos. 1 to 12 Grand Union Walk, is a three-storey terrace of 10 houses and two flats to the north of the service yard fronting onto Regent's Canal. These dwellings were Grade II listed in 2019.
 - Sainsbury's supermarket to the east of the service yard and facing onto Camden Road. This building was also Grade II listed in 2019.
 - The service yard provides surface car parking, the supermarket service area and ramped access to a basement car park. Vehicle access is immediately to the north of GUH and it is exited via the GUH undercroft. The basement car park extends under GUH and Sainsbury's itself. The listing description of Sainsburys specifically excludes the car park and all back of house areas (i.e. the service yard).
- 2.8 GUH is not listed, nevertheless, the site is located within the two Conservation Areas. The majority of GUH, aside from the very southern element, is within the Regent's Canal Conservation Area, which also covers the rear service yard, the Grand Union Walk houses and the Sainsbury's supermarket. The single storey structure at 16 Kentish Town Road is within the Camden Town Conservation Area. The site also adjoins the Grade II* listed Church of St Michael on Camden Road.
- 2.9 That the site and rear service yard are not listed reflects the quality of these places and their poor contribution to the town centre. The service yard, undercroft and surrounding public realm are utilitarian environments dominated by concrete. Footpaths are narrow and there is little passive surveillance or public open space. As a result, the area has experienced significant anti-social behaviour.
- 2.10 GUH itself also makes a poor contribution to the area. As outlined above, the ground floor frontage is dominated by undercroft car parking. Despite security fencing, it too has experienced anti-social behaviour. Fenced off from Kentish Town Road the street frontage is hostile and detracts from the town centre and surrounding Conservation Area. Originally designed for light-industrial use, the upper floors are ill suited to office use whilst the building materials, mechanical plant and equipment have come to the end of their operational life.
- 2.11 It is considered that the current character of the site detracts from the local area, particularly given its key location at the heart of Camden Town Centre. Camden Town is an exuberant location characterised by an eclectic mix of activities and architecture. Despite its proximity to the tube station, Britannia Junction and the high street, this part of Kentish Town Road is an unattractive secondary location. Future plans for the tube station entrance at Buck Street and wider initiatives in the Town Centre will reinforce its importance at the heart of Camden.
- 2.12 The vacancy of the office and bar accommodation at Grand Union House provides the opportunity to regenerate the site and deliver key enhancements to provide a new sense of place, significantly improve the public realm and contribute to Camden's commercial function. Indeed, this is supported by the site's proposed allocation (IDS8, 18-20 Kentish Town Road) within the Draft Camden Site Allocations Local Plan (February 2020) for employment-led development within retail and food and

drink uses on the ground floor. Housing would also be acceptable above ground floor with an indicative capacity of six dwellings.

Surrounding Context

- 2.13 Camden Town is host to a wide range of commercial and residential uses. Historic and modern buildings sit side-by-side leading to a unique and eclectic townscape character.
- 2.14 The western side of Kentish Town Road comprises residential dwellings, office accommodation, the Devonshire Arms pub and the Grade II listed 'Elephant House' office building on Hawley Crescent. Towards Camden Town Station the original Georgian/Victorian building plots have been retained with ground floor commercial uses and residential above.
- 2.15 A short walk from the site, Buck Street market has recently been developed to provide a range of small retail and food and drink units. We understand that the Council are also considering the long-term pedestrianisation of Buck Street as an urban 'streatery'.
- 2.16 Immediately to the south of the site is 10-12 Kentish Town Road where construction is currently underway to extend the original terrace buildings to four storeys overall and construct a basement for use as a hotel (Class C1). To the south east is the five storey Barnes House, a five-storey building comprised of residential flats accessed from Camden Road.
- 2.17 The emerging Site Allocations document also identifies the following draft site allocations surrounding the site:
- a. IDS6: Camden Town over station development
 - i. Directly opposite the site on the corner of Kentish Town Road and Buck Street, this land is allocated for a new station entrance and ancillary supporting facilities for the station with small-scale retail uses provided at ground floor level along the Buck Street and Kentish Town frontages and housing on upper storeys. Employment uses are also considered to be appropriate
 - b. IDS7: Buck Street Market, 192-200 Camden High Street
 - i. This land is allocated predominantly for market use and ancillary town centre uses. Whilst this market has recently been upgraded, the more intensive use of the site is supported by the draft allocation.
- 2.18 In addition, a proposal is currently being progressed for the conversion of a disused railway line to form a linear landscaped park connecting Camden and Kings Cross, the 'Camden High Line'. The route will begin at Kentish Town Road, just to the north of Regent's Canal. Therefore Kentish Town Road and the site itself will form part of the key access route to this new amenity.
- 2.19 This review of the surrounding context confirms that, although within Conservation Areas and adjacent to listed buildings, this location is continuing to experience significant regeneration and change. Any proposal for the site should be viewed in this context.
- 2.20 The following section sets out the relevant planning history for the site and the surrounding area and summarises the pre-application advice received from the Council and the steps taken by the applicant to consult with the public and stakeholders in the local area.

3 PLANNING HISTORY

Planning History

The Site

- 3.1 A schedule of the site's planning history is enclosed in **Appendix A** of this statement. It outlines that Grand Union House was granted planning permission through a series of consents for light industrial use in the mid-late 1980s along with the wider Grimshaw campus. In 1993 consent was granted for a cinema, retail and health club uses; however, we understand that these uses were never implemented.
- 3.2 In December 2018 a planning application (ref: 2018/6092/P) was submitted for the site for the:
- “Partial demolition and redevelopment of the existing building, to provide a new office (Class B1) building with associated roof terraces, ground floor flexible uses (Class A1 /A3/ D2), and 6 flats (1 x studio, 2 x 1 bed and 3 x 2 bed), along with associated landscaping works.”*
- 3.3 The proposal was for the demolition and rebuild of the majority of GUH with a two-storey upward extension. 16 Kentish Town Road would be redeveloped to provide a four-storey residential building. Flexible commercial units were provided at ground floor level. A key aspect of the proposal was the retention of the majority of the ground level undercroft car parking spaces.
- 3.4 The application was generally well received and constructive conversations were proceeding with the Council on the detailed design and the Section 106 contributions. However, during the determination period the entire Grimshaw campus was proposed for heritage listing. Whilst Historic England's conclusions was clear that GUH is not of historic significance, the adjoining Sainsbury's supermarket and Grand Union Walk Houses were Grade II listed.
- 3.5 Once the adjoining properties were listed the applicant considered it appropriate to revisit the scheme in the new context. As such, the application was withdrawn in February 2020.

Surrounding Area

- 3.6 Planning permission was granted on 3 August 2017 (Reference: 2017/2852/P) at 10-12 Kentish Town Road, which is immediately to the south of the site on Kentish Town Road. The consent was for the “erection of part two-part single storey extensions to the roof and rear and change of use of the upper floor from ancillary accommodation associated with the ground floor restaurant (Class A3) to hotel (Class C1)”.
- 3.7 Planning permission was granted at 8 Kentish Town Road on 17 July 2018 (reference: 2018/0907/P) for the “Erection of roof extension with first and second floor rear extension and fenestration alterations”.
- 3.8 The above schemes were subsequently revised and on 25 June 2020, planning permission was granted for a “roof extension, first and second floor rear extensions and change of use of the upper floors (Nos. 10-12) from ancillary accommodation associated with the restaurant (Class A3) to hotel (Class C1)” (reference: 2019/0474/P) (8-12 Kentish Town Road). This development is currently under construction.

Pre-Application Discussions

- 3.9 Following the withdrawal of the 2018 scheme, the applicant re-visited the design afresh to ensure that it best responds to the local context, and that it can be delivered into a changing economic landscape. Central to this review was further engagement with Sainsbury's who own the rear service yard and basement car park, and are the freeholder of the site. Further discussions were held with them to agree a wider masterplan that will reduce the overall level of car parking, provide new areas of public realm and optimise development of GUH. As a result, it has been agreed that the car park spaces in the ground level undercroft can be relocated to the existing Sainsbury's basement car park allowing the ground floor area to be incorporated into the GUH development.
- 3.10 In addition, a new design team were appointed to revisit the detailed design and layout of the building, including a new public realm strategy, enhanced sustainability and biodiversity, and the provision of planted terraces in Grand Union House, and revised elevational treatment and roof profile. In this regard, the revised proposal successfully builds upon the principles established by the 2018 scheme but has optimised it to deliver additional enhancements and planning benefits.
- 3.11 In November 2020 a request for pre-application advice was submitted to the Council to discuss the revised proposal. A pre-application meeting was held in December 2020 at which officers generally supported the revised design. Further detail was requested, and it was recommended that the proposal be presented to Camden's Design Review Panel (DRP).
- 3.12 The 2018 scheme had been subject to DRP review in 2018 and 2019, and was generally considered to be acceptable. Therefore, the revised proposal underwent a Chair DRP review in January 2021. The DRP strongly supported the revised proposal stating that:
- "The panel applauds the ambitious work undertaken by the design team to create a new type of workspace for Camden, placing wellness, sustainability, landscape, ecology and biodiversity at its heart. Thoughtful refinement of the design following the appointment of a new design team is supported, and the panel finds significant improvements have been made to the proposed landscape and public realm."*
- 3.13 The DRP advised that further refinement would be required on the building's detailed design.
- 3.14 Following the DRP Chair Review a second pre-application meeting was held with Council officers to specifically discuss the design and landscaping, land use and highways impacts. Again, officers welcomed the proposal and confirmed that the proposed mix of uses were acceptable, and the design was appropriate. Further detail was requested to be submitted with the planning application, and officers advised that they would need to consider further the replacement of on-street car parking with additional landscaping and service bays.
- 3.15 Informal discussions have also taken place in relation to energy and sustainability. Contributions towards affordable housing and other obligations will be subject to a review of the Financial Viability Assessment.

Public & Stakeholder Engagement

- 3.16 Extensive public consultation was undertaken as part of the 2018 planning application. Conscious of the site's key location in Camden Town, the applicant has again engaged with local residents and stakeholders in progressing the new design.
- 3.17 Covid-19 social distancing requirements meant that traditional public consultation formats were not possible during the consultation programme. A digital first approach to engagement was therefore adopted, substituting video meetings and webinars for face-to-face formats. These were publicised by way of newsletter to c.2,400 addresses surrounding the site and an advert in the Camden New

Journal. The newsletter and advert encouraged local people to register for the webinars via the website, telephone, or email.

- 3.18 The website 'www.sellar-camden.com' included details about the site, the scheme and consultation, and will continue to be updated throughout the consultation process. Public webinars were held on Wednesday 20th January & Thursday 21st January, 6pm to 7pm. The webinars were attended by 15 people, including Grand Union Walk residents, Barnes House residents and Camden residents. The webinar included a presentation from the project team, followed by a live Q&A session with attendees. Any questions that were not answered as part of the webinar were followed up afterwards by email.
- 3.19 Prior to the public webinar, letters were sent via email to key stakeholders including ward councillors, cabinet members, local community groups, businesses, residents' associations, and Camden based media outlets. The project team have also met separately with Grand Union Walk residents, Barnes House residents and Cllr Danny Beales to date and are open to further meetings with any stakeholders who request a briefing on the proposals.
- 3.20 Historic England were also consulted and who confirmed that continued to view that GUH is not to be heritage listed and that discussions with Camden on the design could proceed.
- 3.21 This process of engagement informed the final design of the scheme, particularly in regard to designing-out anti-social behaviour and the protection of local amenity. For full details of the consultation taken please see the accompanying Statement of Community Involvement.
- 3.22 The following section provides an overview of the final development proposal.

4 PROPOSED DEVELOPMENT

4.1 As outlined in the proceeding sections of this statement, the site is comprised of Grand Union House (GUH, 20 Kentish Town Road) and 16 Kentish Town Road. The buildings currently have a mix of commercial uses, the majority of which is offices. Many of the building elements have come to the end of their operational lifespan, and the building is considered to provide poor quality accommodation and detract from this key location in Camden Town

4.2 The vacancy of the building provides a new opportunity to deliver the comprehensive regeneration of the site, in-line with the emerging site allocation for employment-led development. Furthermore, it has been agreed that the 12 car parking spaces currently assigned to Grand Union Walk residents are to be relocated to the existing Sainsbury’s basement car park, providing the opportunity to incorporate the ground floor undercroft parking area in the development proposal.

4.3 The proposed development is for the:

“Part-demolition, in-fill, re-build and upward extension to provide additional Class E office and commercial floorspace, six residential units (Class C3), new areas of landscaping and public realm.”

4.4 The proposal will comprise two new buildings, and extensive new landscaping and public realm:

GUH Commercial Building

4.5 The new GUH commercial building will largely retain the existing building footprint, including the existing undercroft access to the rear service yard, but will in-fill the existing undercroft car park and loading dock areas to provide new flexible commercial space. The height of the building will be increased by two storeys to provide new high-quality employment space.

4.6 The design of the scheme has been fundamentally revisited from the 2018 proposal to prioritise wellness and sustainability and complement the architectural character of the adjoining ‘High-Tech’ Grimshaw campus. The existing 1980s concrete frame will be retained up to first floor level, with four new storeys of steel and timber structure above. Landscape and planting permeate the proposal, with a new ‘green house’ bridge element above the undercroft access facing Buck Street, a rooftop garden to the south of the building, and a series of small terraces at roof level.



4.7

4.8 Figure 4.1: Kentish Town Road Elevation

- 4.9 The existing structural frame of the building is to be wrapped in a fine grid of glazing and aluminium curtain walling, the horizontal proportions of which following the rhythm of the existing Grimshaw façade. Generous windows and sliding doors to the offices will facilitate natural ventilation as local air quality improves in the future. The transparent facade will reveal the working office to the street along with generous sliding doors that will open the office interiors to the public realm. The technical workings of the building will be displayed to passers-by in the spirit of High-Tech architecture, including bicycle storage and mechanical plant.



Figure 4.2: Proposed Kentish Town Road Elevational Detail

- 4.10 Key High-Tech features of the existing scheme are retained, such as the volume of the external stair to the North and staircases visible to the street. The new top floor follows a zigzag plan form, pulling back from the building edge to create triangular balconies, some of which will be accessible. The roof height has been reduced from the 2018 proposal.
- 4.11 The upper floors of the new GUH building will be in Class Eg employment use and it is intended that they will be occupied as offices. The layout will provide flexibility to users, facilitating single or multi-let occupancy aligned to the creative and tech sector.
- 4.12 At ground floor level, north of the undercroft access the existing car parking will be converted to provide a new open commercial space, the double height of which will facilitate the creation of a new mezzanine level whilst providing views through to the rear service yard. It is intended that this area will also be occupied as offices but it will be in a general Class E a-g use allowing potential to be occupied by a range of town centre users.

4.13 To the south at ground floor level, the existing office reception within the undercroft will be removed doubling the shared pavement area and providing a more open pedestrian route to the service yard, Sainsburys and Camden Road. A new office reception to the upper floors will be introduced, which again will have flexible Class E a-g use in order to enable the office reception to accommodate additional active uses, such as a coffee shop. The remainder of the ground floor GUH building will comprise two flexible retail/commercial units also in Class E a-g use allowing these units to respond to the needs of the town centre and be occupied by a range of commercial uses.

Residential-led Building

4.14 The existing single storey structure at 16 Kentish Town Road will be demolished and replaced with a four-storey building. The upper floors will comprise six residential units (three x 1 bed 2 person and three x 2 bed 4 person flats) including one full accessible unit. The lower floors comprise a further flexible retail/commercial unit (Class E a-g), and residential access, bin, and cycle storage.

4.15 This new building will again be brought forward in the High-Tech style to complement the new GUH and wider Grimshaw campus, but it will be playfully adapted to reflect the residential uses and mediate with the adjoining buildings. The grid expression of the office building is laid over an elevation of ‘punched’ windows and corrugated anodised aluminium. The generous windows will provide good daylighting whilst ensuring privacy and a sense of enclosure for residents. Balconies are located on the rear elevation, screened from the activity of Camden Town.

4.16 The ground floor frontage also combines glazing with solid features, with a transparent treatment for the new retail/commercial unit and metal elements for the residential frontage. The approach is cohesive and references the architectural language of the adjoining GUH and period terraces to the south.



Figure 4.2: Proposed Kentish Town Road Elevational Detail

New Landscaping and Public Realm

- 4.17 With a new transparent frontage and the replacement of the existing undercroft car parking and loading dock, the proposal will create an active environment, where interior and exterior spaces and activities interact.
- 4.18 New landscaping and enhancements will be made to the undercroft access and the immediate service yard area behind, with refurbished paving, low level planting beds and new trees. These features will be brought forward in collaboration with Sainsbury's who are the freeholder and who are retaining the service yard as an active and usable area. A master plan for the service yard has been drawn up and, whilst outside of the scope of the planning application, the current proposal is in-line with these principles to ensure a cohesive environment and that there will be no impact on the continued function of this area.
- 4.19 The undercroft access to the service yard, Sainsbury's and Camden Road will be widened through the removal of the existing office reception area allowing improved views from Kentish Town Road and passive surveillance. A new lighting scheme will be introduced providing activity and engagement with the street and ensuring this area is appropriately lit.
- 4.20 The Kentish Town Road footway is within the ownership of Camden highways, and so will be subject to a Section 278 Agreement, but extensive works are proposed to enhance this environment and provide a more attractive pedestrian route in this key part of the town centre. Currently this location has a narrow footway and 10 on-street car parking bays. There is a lack of greenery with one tree in place and no servicing bays.
- 4.21 On the north of the site, the existing footway will be widened by reducing the existing on-street parking. New trees and planted beds will be introduced along the road, which will also serve as SUDS features. The existing tree will be retained. To the south, the footway will also be widened and new planting introduced; however, four car parking spaces (including one blue badge bay) will be retained and a new servicing bay will be introduced. These works will therefore significantly improve this section of Kentish Town Road, crucial given the new tube station entrance at Buck Street, whilst ensuring it retains its functionality. The proposal will also tie into the proposed Camden Highline, with Kentish Town Road forming the main arterial route from Camden Station to the start of the Highline.

Proposed Use Classes

- 4.22 As outlined above, it is intended that the GUH building will be occupied as offices with three flexible ground floor commercial/retail units. In terms of the use classes, the upper floors will be specified as Class Eg (employment), whilst the ground floor accommodation will be flexible to Class E a-g.
- 4.23 The residential building at 16 Kentish Town Road will be in Class C3 whilst the ground floor commercial unit will be flexible Class E.
- 4.24 The use classes will be as follows:
- Office accommodation (ground floor including reception), 1,101 sq.m GIA : Class E a-g
 - Office accommodation (Floors 1 to 4), 5,556 sq.m GIA: Class Eg employment
 - Three ground floor flexible commercial (retail) units, 251 sq.m GIA: Class E
 - Six flats: Class C3 residential

- 4.25 Class Eg (employment) comprises offices, research & development and light industry space. These uses were all previously covered by the former Class B1 and are generally considered to be appropriate in residential and town centre locations.
- 4.26 Class E a-g includes:
- a. retail,
 - b. food and drink,
 - c. professional services,
 - d. indoor sport, recreation or fitness
 - e. medical or health services
 - f. creche, day nursery or day centre
 - g. employment
- 4.27 The following section outlines the planning policy framework against which the proposal will be assessed.

5 PLANNING POLICY

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires development proposals to be determined in accordance with the statutory Development Plan unless material considerations indicate otherwise.
- 5.2 Camden's Local Plan is comprised of the:
- London Plan (2016)
 - Camden Local Plan (2017)
 - Policies Map (2017)
 - London Housing SPG (2016)
- 5.3 The following Camden Planning Guidance documents are considered to be of relevance in terms of this application.
- Access for All (March 2019)
 - Air Quality (January 2021)
 - Amenity (January 2021)
 - Design (January 2021)
 - Developer Contributions (March 2019)
 - Employment Sites and Business Premises (January 2021)
 - Energy Efficiency and Adaptation (January 2021)
 - Housing (January 2021)
 - Public Open Space (January 2021)
 - Planning for Health and Wellbeing (January 2021)
 - Town Centres and Retail (January 2021)
 - Transport (January 2021)
 - Water and Flooding (March 2019)
- 5.4 Camden Council are in the process of reviewing the Camden Sites Allocations Plan (2013). Consultation on the draft Site Allocations Local Plan (February 2020) took place between Thursday 13 February and Friday 27 March 2020. Once adopted it will be used alongside other policies in Camden's Development Plan to assess development proposals on key sites and areas. The site is allocated for employment-led development in the draft Site Allocations document.
- 5.5 In addition to the above, The Mayor has formally approved the new London Plan and it is expected to be formally adopted in early 2021. The most recent version of the plan is the 'Publication London Plan' of December 2020. Given the advanced state of the document, full weight should be given to its policies, and it will become the Spatial Development Plan for London and part of the statutory Development Plan for Greater London.

- 5.6 The National Planning Policy Framework (NPPF), published in February 2019, and the National Planning Practice Guidance (NPPG), which is an online resource, are also material considerations.

Site Designations

- 5.7 On the basis of the adopted Proposals Map (2017), the site is located within the following designations.

- Camden Town Centre
- Along a Protected Secondary Frontage within Camden Town Centre.
- Regent's Canal Conservation Area
- Camden Town Conservation Area

- 5.8 In addition, GUH (18-20 Kentish Town Road) is identified in Camden's draft Site Allocation document for:

"An employment-led development with retail and food and drink uses on the ground floor. Housing would also be acceptable use above ground floor level."

National Planning Policy Framework (NPPF) (February 2019)

- 5.9 Paragraph 7 of the NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development, whilst paragraph 8 sets out the three dimensions to sustainable development: economic, social, and environmental.
- 5.10 Paragraph 8 also states that these roles should not be undertaken in isolation and it outlines that to achieve sustainable development, economic, social, and environmental gains should be sought jointly and simultaneously through the planning system. Paragraph 10 states that a presumption in favour of sustainable development is at the heart of the NPPF.
- 5.11 Paragraph 11 states that for decision-taking this means 'approving development proposals that accord with the development plan without delay' and where the development plan is absent, silent, or relevant policies are out-of-date, granting permission unless:
- the application of policies in this Framework that protect areas or assets of importance provides a clear reason for refusing the development proposed; or
 - 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.
- 5.12 Paragraph 39 notes that early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community.
- 5.13 Paragraph 68 outlines that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and that local planning authorities should support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes.

- 5.14 In line with paragraph 38 of the NPPF, local planning authorities should approach decisions in a positive and creative way, and decision makers at every level should seek to approve applications for sustainable development wherever possible.
- 5.15 Paragraph 117 of the NPPF encourages the effective use of land for new homes and other uses by reusing land that has been previously developed (brownfield land) and existing buildings. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or 'brownfield' land.
- 5.16 Paragraph 118 of the NPPF states that planning policy and decisions should:
- encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains;
 - give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land; and
 - promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained, and available sites could be used more effectively.
- 5.17 Paragraph 122 also notes that planning policies and decisions should support development that makes efficient use of land.
- 5.18 Paragraph 85 recognises that residential development often plays an important role in ensuring the vitality of town centres and encourages residential development on appropriate sites.
- 5.19 Paragraph 127 states that planning policies and decisions should ensure that developments:
- 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 visually attractive as a result of good architecture, layout and appropriate and effective landscaping
 - establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming, and distinctive places to live, work and visit;
 - optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
 - 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; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.
- 5.20 Paragraph 155 states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Paragraph 163 outlines that, when determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Paragraph 165 states that major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate.

- 5.21 Paragraph 189 states that, in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting.
- 5.22 Paragraph 193 further notes 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.

Relevant Policies

Camden Local Plan (2017)

- Policy DM1: Delivery and Monitoring
- Policy H1: Maximising Housing Supply
- Policy H2: Maximising the Supply of Self-contained housing from Mixed Use Schemes
- Policy H4: Maximising the Supply of Affordable Housing
- Policy H6: Housing Choice
- Policy H7: Large and Small Homes
- Policy E1: Economic Development
- Policy E2: Employment Premises and Sites
- Policy A1: Managing the Impact of Development
- Policy A2: Open Space
- Policy A3: Biodiversity
- Policy A4: Noise and Vibration
- Policy C2: Community Facilities
- Policy C3: Cultural and Leisure Facilities
- Policy D1: Design
- Policy D2: Heritage
- Policy CC1: Climate Change Mitigation
- Policy CC2: Adapting to Climate Change
- Policy CC3: Water and Flooding
- Policy CC4: Air Quality
- Policy CC5: Waste
- Policy TC1: Quantity and Location of Retail Development
- Policy TC2: Camden's Centres and Other Shopping Areas

- Policy TC4: Town Centre Uses
- Policy T1: Prioritising Walking, Cycling and Public Transport
- Policy T2: Parking and Car Free Development

Camden Draft Site Allocations Plan (February 2020)

- Policy IDS8 – Grand Union House, 18-20 Kentish Town Road

5.23 Publication London Plan Policies

- Policy E1: Offices
- Policy E2: Providing Suitable Business Space
- Policy E3: Affordable Workspace
- Policy G1: Green Infrastructure
- Policy G4: Open Space
- Policy G5: Urban Greening
- Policy GG1: Building Strong and Inclusive Communities
- Policy GG2: Making the Best Use of Land
- Policy GG3: Creating a Healthy City
- Policy GG4: Delivering the Homes Londoners Need
- Policy GG5: Growing a Good Economy
- Policy GG6: Increasing Efficiency and Resilience
- Policy D3: Optimising Site Capacity through Design-Led Approach
- Policy D4: Delivering Good Design
- Policy D5: Inclusive Design
- Policy D6: Housing Quality and Standards
- Policy D7: Accessible Housing
- Policy D13: Agent of Change
- Policy H1: Increasing Housing Supply
- Policy H4: Delivering Affordable Housing
- Policy H5: Threshold Approach to Applications
- Policy H10: Housing Mix and Size

- Policy HC1: Heritage Conservation and Growth
- Policy HC6: Supporting the night-time economy
- Policy SD6: Town Centres and High Streets
- Policy SD7: Town Centres: Development Principles and Development Plan Documents
- Policy SD8: Town Centre Network
- Policy SI1: Improving Air Quality
- Policy SI2: Minimising Greenhouse Gas Emissions
- Policy SI5: Water Infrastructure
- Policy SI12: Flood Risk Management
- Policy SI13: Sustainable Drainage
- Policy SI14: Managing Heat Risk
- Policy SI15: Water Infrastructure
- Policy T1: Strategic Approach to Transport
- Policy T2: Healthy Streets
- Policy T5: Cycling
- Policy T6: Car Parking
- Policy T7: Deliveries, Servicing and Construction

5.24 The following section of this report assesses the proposed development against this planning policy context.

6 PLANNING APPRAISAL

6.1 The proposal is for the part-demolition, in-fill, re-build and upward extension to provide additional Class E office and commercial floorspace, six residential units (Class C3), new areas of landscaping and public realm.

6.2 This section considers the proposal against the adopted and emerging planning policy context.

Overall Principle of Development

6.3 Camden’s Draft Site Allocations Document (Policy IDS8) identifies the site for employment-led development with retail and food and drink uses on the ground floor. Housing would also be acceptable use above ground floor level with an indicative capacity for six homes. It therefore provides a relevant framework against which to assess the overall principle of the proposal. Draft Policy IDS8 outlines six criteria that development should fulfil, which are considered in Table 6.1 below:

Part	Draft Policy IDS8	Response
A	Activate the ground floor along Kentish Town Road through infill development that complements Camden Town Centre’s retail character and supported by improvements to the public realm surrounding the site.	<p>The proposal will provide three new flexible-use (Class E) units at ground floor level that will be suitable for a variety of town centre uses.</p> <p>Furthermore, the ground floor office floorspace on the northern part of the site will also be a general Class E use ensuring that it could potentially be occupied by other town centre uses. Activation of the frontage is central to the design, with views through to the service yard to the rear.</p> <p>There will also be extensive landscaping and public realm improvements introduced.</p>
B	Achieve a positive relationship with the now listed elements of the Grand Union group of buildings.	<p>The fundamental concept of the scheme is a modern interpretation of the Grimshaw’s high-tech aesthetic with extensive use of glazing and metallic materials. The activities within the new GUH building will be visible, including plant rooms, stairs, and cycle stores, bringing new activity and vitality to Kentish Town Road and the service yard.</p> <p>The service yard will also be enhanced with new views through the building, providing visual linkages and removing the inhospitable undercroft parking and loading dock areas.</p> <p>The accompanying Heritage Assessment confirms that the proposal will enhance the setting of the adjoining listed buildings and the surrounding Conservation Areas.</p>
C	Address the issues associated with anti-social behaviour in and around this site.	<p>The design team have liaised with both the Secure by Design officer and local residents to ensure that the new public realm and landscaping designs-out anti-social behaviour.</p> <p>The service yard will be opened-up with the undercroft access widened and views from Kentish</p>

Part	Draft Policy IDS8	Response
		Town Road through the ground floor office accommodation. Furthermore, the new ground floor uses and the strengthening of pedestrian links to Sainsbury's will increase passive surveillance.
D	Retain the access to Sainsbury's while removing vehicle parking associated with the existing commercial use of Grand Union House.	The existing ground floor car parking and loading dock will be removed, with the existing car parking spaces for Grand Union Walk residents relocated to the basement level. The existing Sainsbury's pedestrian and vehicular access, and servicing arrangements will be maintained.
E	Explore opportunities to improve the public realm in the servicing yard and improve access to, and visibility of, St Michael's Church.	Improvements will be made to the rear servicing yard including new hard surfacing and landscaping. The undercroft access will be widened for an improved pedestrian environment. The design also aligns with a wider masterplan for the service yard being brought forward separately in conjunction with Sainsbury's. Due to differences in ground level access and site ownerships it is not possible to provide an access via St Michael's Church or Barnes House; however, the proposal will enhance the backdrop of views from these locations.

Table 6.1: Response to Draft Site Allocation Criteria

- 6.4 In providing employment-led development, active ground floor uses and six new homes, the proposal is therefore in accordance with the requirements within draft Policy IDS8. Accordingly, the overall principle of the development is considered to be acceptable.
- 6.5 Nevertheless, the principle of the development has also been considered against the adopted Local Plan and new London Plan.

Principle of Additional Commercial Accommodation

New office floorspace

- 6.6 Draft London Plan Policy E1 supports improvements to the quality, flexibility and adaptability of office space of different sizes through new office provision, refurbishment and mixed-use development. The policy encourages office floorspace in Town Centre locations. Part G of the policy requires development proposals for new office floorspace to take into consideration the need for a range of suitable workspace including lower cost and affordable workspace.
- 6.7 Draft London Plan Policy GG5 supports development which diversifies London's economy and plans for sufficient employment space in the right locations to support economic development and regeneration.
- 6.8 Policy E1 of Camden's Local Plan seeks to secure a successful and inclusive economy in Camden by creating the conditions for economic growth. In order to do so The Council will maintain and support stock suitable for a variety of businesses of differing requirements and sizes. New office

development is directed towards growth areas, Central London and Town Centres in order to meet the forecast demand of 695,000sqm of office floorspace between 2014 and 2031.

6.9 Camden Local Plan Policy E2 seeks to protect existing employment premises but also supports the delivery of higher intensity redevelopment of premises or sites suitable for continued business use provided that the following criteria are met:

- The level of employment floorspace is increased or at least maintained;
- The redevelopment retains existing businesses on the site as far as possible;
- Relocation of any businesses will not harm the local economy
- The proposed premises are suitable for start-ups and SMEs, such as managed affordable workspace where viable;
- The scheme would increase employment opportunities for local residents, including training and apprenticeships; and
- The scheme includes other priority uses such as housing, affordable housing, and open space where relevant.

6.10 Camden's Draft Site Allocation Plan Policy IDS8 allocates the site for an employment-led development. The supporting policy text (paragraph 10.81) adds that the Council considers there is an opportunity to increase the level of employment floorspace which should remain the predominant element in any proposed scheme.

6.11 **Flexible Commercial Space**

6.12 Camden Local Plan Policy TC1 advises that the Council will promote the delivery of significant additional provision of retail in Camden Town Centre. Camden Local Plan Policy TC2 states that the Council will protect and enhance the role of Camden's centres by providing and maintaining a range of shops, including independent shops, services, food, drink and entertainment and other suitable uses to provide variety, vibrancy, and choice.

6.13 Part G of Camden's Local Plan Policy TC2 states that the Council will protect secondary frontages as locations for shops (Class A1) together with a broader range of other town centre uses to create centres with a range of shops, services, and food, drink and entertainment uses which support the viability and vitality of the centre.

6.14 Camden Local Plan Policy TC4 seeks to ensure that the development of Town Centre uses does not cause harm to the character, function, vitality and viability of the centre or the amenity of neighbours. In assessing development proposals for new Town Centre uses, the Council will consider the effect of development on shopping provision and the character of the centre in which it is located; the Council's expectations for the mix and balance of uses within frontages; impacts on small and independent shops and markets; the impact of the development on nearby residential uses and amenity and the potential for antisocial behaviour. Policy C4 seeks to protect public houses which are of community, heritage, or townscape value.

6.15 Appendix 4 of the Camden Local Plan sets out the Council's aspirations for the mix of Town Centre uses within the borough. In order to ensure the vitality and viability of the Town Centre a minimum of 50% Class A1 retail use floor space should be provided along secondary frontages within Camden Town Centre.

- 6.16 Camden's Draft Site Allocation Plan Policy IDS8 allocates the site for an employment-led development with retail and food and drink uses on the ground floor with residential as an acceptable use above ground floor level. Development is required to activate the ground floor along Kentish Town Road through infill development that compliments Camden Town Centre's retail character.
- 6.17 Draft London Plan Policy GG1 supports development proposals that seek to ensure London continues to generate a wide range of economic and other opportunities and promotes the crucial role town centres have in the social, civic, cultural and economic lives of Londoners, and plans for places that provide important opportunities for building relationships during the daytime, evening and night-time.
- 6.18 Draft London Plan Policy SD8 specifies that Town Centres should be the focus for the majority of higher order comparison goods retailing whilst securing opportunities for higher density employment and leisure development in a high-quality environment,
- 6.19 Camden Local Plan Policy C3 seeks to protect leisure facilities and where proposals involve the loss of a facility, it must be demonstrated to the Council's satisfaction that there is no longer a demand, When assessing such planning applications, the Council will take into account the size, layout and design of the existing facility, the mix of uses in the area and the impact of the proposal on the range of cultural and leisure facilities in the area.
- 6.20 Draft London Plan Policy HC6 seeks to protect and support evening and night-time cultural venues such as pubs, night-clubs.

Assessment – Employment Space

- 6.21 The proposal would increase the level of employment floorspace on site from 2,651 sq.m GIA to 6,657 sq.m GIA, a net increase of 4,006 sq.m. Both adopted and emerging policy supports the continued provision of employment space on site, with draft Policy IDS8 allocating the site for employment-led use.
- 6.22 It is intended that the upper floors of the GUH building and the majority of the ground floor will be occupied as offices, and it has been designed to facilitate one large-occupier or a multi-let scenario. The upper floors of the building will be specified as Class Eg (employment). The ground floor area office areas will be general Class E to allow flexibility for the use of these spaces and the building to respond to the future needs of the town centre. In particular, this will facilitate the inclusion of active uses in the office reception area, such as a café, if desired.
- 6.23 The accompanying Regeneration Statement identifies a key need for flexible employment floorspace in Camden. There is strong demand for space from Small and Medium sized business but also a lack of large-scale office accommodation which limits businesses' ability to expand and operate in the town centre. It is considered that there is unmet demand for such large-scale floorspace, as demonstrated by the redevelopment of the old Breakfast Television Centre by MTV/Viacom opposite the site on Hawley Crescent and the infill of Greater London House in Mornington Crescent to accommodate the growth of Asos.
- 6.24 The proposed development will respond to this need for new business space and will provide high quality flexible accommodation that will meet the needs of a variety of users. The employment floorplates will be easily divisible to cater to differing business needs and will be attractive to a range of potential occupiers, including single occupiers and SMEs. The flexibility of the spaces means that businesses that choose to locate there can take more space within the building as and when they need it. Accordingly, the proposed office floorspace would cater to start-ups and SMEs as well as

growing companies who require larger floorplates using the building to grow and flourish, therefore retaining business in the borough.

- 6.25 It is considered that such development is appropriate in this key location in Camden Town centre. Located next to the existing and new entrances to the tube station, the new employment uses will bring further activity and vibrancy and will diversity the range of uses in this location. The ground floor accommodation will also be flexible Class E to respond to the future needs of the town centre.
- 6.26 Given that Camden Local Plan Policy E2 both protects existing employment premises and supports the delivery of higher intensity redevelopment of business sites, that there is an identified need for large-scale flexible employment space and the benefits arising from the proposal, the principle of the additional employment floorspace is considered to be acceptable and in accordance with policy.

Assessment – Flexible Commercial Space

- 6.27 The site is designated as a secondary frontage within Camden Town. Aside from the office accommodation, there is 303 sq.m GIA of commercial accommodation: a retail shop (Class E), a bar (Sui Generis) and a recreation/fitness unit (Class E). Arranged over ground and mezzanine levels, these units are considered to be ill-suited to meet the needs of occupiers and require substantial refurbishment.
- 6.28 The proposed ground floor accommodation will comprise 251 sq.m of flexible commercial accommodation in the form of three retail units. These units will be modern high-quality spaces on a single level designed to meet the needs of a variety of occupants and therefore will be more usable than the existing multi-level accommodation. In addition, the ground floor employment space and reception (1,101 sq.m GIA), whilst intended as offices, will be in general Class E use allowing their occupation in a range of town centre uses and ensuring they can respond to future occupier demand.
- 6.29 Camden Local Plan Policy C4 seeks to protect public houses which are of community, heritage or townscape value; however, the existing bar on site has been unsuccessful. Run as a series of late night venues it has been vacant since April 2020. It is therefore not considered to be of community value. Nevertheless, the new flexible ground floor accommodation will allow the introduction of food and drink uses in accordance with Class E of the Use Classes Order.
- 6.30 Camden Local Plan Policy C3 seeks to protect leisure facilities such as recreation/fitness uses. At 113 sq.m, the existing unit is small scale in nature and, again, the new commercial floorspace will be flexible and will facilitate the inclusion of such facilities in-line with Class E of the Use Classes Order.
- 6.31 Therefore, the proposed development will provide ground floor active town centre uses that will be flexible to respond to the future needs of Camden Town. This is in accordance with the emerging Site Allocation, which seeks active retail and food and drink uses, and Camden Policies TC1 and TC2 which respectively promote new retail and other town centre uses in Camden Town and protected secondary frontages.

Principle of Residential

- 6.32 Camden Draft Site Allocation Plan Policy IDS8 allocates the site for an employment-led development and confirms that residential use is acceptable above ground floor level. The supporting policy text (paragraph 10.81) notes that there is the opportunity to include a limited amount of permanent self-contained housing within the site, subject to a satisfactory standard of amenity being achieved.
- 6.33 Draft London Plan Policy GG4 states that those involved in planning and development must ensure that more homes are delivered. Draft London Plan Policy H1 states that boroughs should optimise

the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions and seeks the creation of 10,380 additional homes in Camden over the period 2019/20-2028/29.

- 6.34 Draft London Plan Policy GG2 supports development proposals that make the best use of land. Councils should support proposals which seek to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations which are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling. A design-led approach should be applied to determine the optimum development capacity of sites.
- 6.35 Camden Local Plan Policy H1 seeks to secure a sufficient supply of homes and seeks to maximise the supply of housing. The target for new homes has been increased to 16,800 additional homes from 2015/16-2030/31, including 11,130 additional self-contained homes.
- 6.36 Camden Local Plan Policy TC2 supports the development of housing within centres and Central London including above and below shops where this does not prejudice town centre function.
- 6.37 Policy H2 of Camden's Local Plan seeks to maximise the supply of self-contained homes as part of a mix of uses and will seek residential accommodation in development proposals where the total gross floorspace increases by more than 200sqm (GIA) and will require 50% of all additional floorspace to be self-contained housing.

Assessment – Residential

- 6.38 The proposal will include six residential flats on the upper floors of the new building at 16 Kentish Town Road. Camden Policy TC2 supports the provision of new housing in town centres and the dwellings will be located adjacent to existing residential properties at Barnes House. Therefore, the principle of additional residential accommodation is considered to be acceptable.
- 6.39 Camden Policy H2 outlines that where there is non-residential development in Camden Town that involves additional floorspace of more than 200 sq.m, 50% of all additional floorspace should be self-contained housing. However, this is subject to several considerations. Where the Council is satisfied that providing on-site housing is not practical or housing would more be appropriately be provided off-site, provision of housing on an alternative site nearby or a payment-in-lieu will be sought.
- 6.40 The development will result in an overall uplift in floorspace of 4,334 sq.m GIA, 523 sq.m of which will be residential. Whilst this is a shortfall against the policy target, Policy H2 identifies several criteria which would justify an exception to the policy, including:
- g) the extent of any additional floorspace needed for an existing user*
- 6.41 The accompanying Regeneration Statement confirms that there is a need for additional employment floorspace for both SMEs and large occupiers. There is a shortfall of such space in Camden, particularly for large office accommodation and as a result, such users are directed to other locations in London. It is considered that the proposed development responds to a real unmet need for such accommodation and will be flexibly designed to be meet the needs of a variety of users and multiple occupancy.
- h) the impact of a mix of uses on the efficiency and overall quantum of development*
- 6.42 If 50% of the new (uplift) in floorspace were to be residential in would significantly undermine the site's ability to deliver additional employment floorspace. Furthermore, there would be issues

providing sufficient residential servicing, access, and amenity space for a higher number of residential units. Multiple residential cores would likely be required reducing the site's ability to have an active ground floor frontage, and reduce efficiency and viability.

j) whether an alternative approach could better meet the objectives of this policy and the Local Plan

6.43 In addition, the draft site allocation is a material consideration. Paragraph 10.81 of the draft Site Allocations document outlines that:

“The Council considers there is an opportunity to increase the level of employment floorspace, which should remain the predominant element in any scheme. There may also be an opportunity to include a limited amount of permanent self-contained housing within the site, subject to a satisfactory standard of amenity being achieved.”

6.44 An indicative housing capacity of six additional homes is identified and the proposal includes six residential flats on the upper floors of 16 Kentish Town Road. Therefore, a limited amount of residential housing is provided as part of this employment-led scheme.

6.45 The proposal is therefore fully in accordance with the draft site allocation. It is considered that application fulfils Policy H2 criteria g), h) and j), and therefore 50% housing on site is not required in this circumstance. There is no alternative site in the local area for off-site provision, and so payment in-lieu of the shortfall in housing will form part of the discussions on financial viability.

Loss of Car Parking

6.46 At the local level Camden Local Plan Policy T1 prioritises walking, cycling and public transport in the borough. In pursuance of this Camden will seek to ensure developments improve the pedestrian environments by supporting improvements to the pedestrian environment.

6.47 Camden Local Plan Policy T2 states that the Council will limit the availability of parking and require new development in the borough to be car free.

6.48 Draft London Plan Policy T1 expects all development to make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking, and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated. In addition to this, the policy supports development proposals that facilitate the delivery of the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041.

6.49 Draft London Plan Policy T2 requires development proposals to reduce the dominance of vehicles on London's streets whether stationary or moving and be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport.

6.50 Draft London Plan Policy T6 specifies that car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity. Car-free development is encouraged and should be the starting point for all development proposals in places that are well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite').

6.51 As the proposals will result in the loss of on-street parking, the supporting policy text (paragraph 6.9) of Camden Local Plan Policy A1 is applicable and states that any development affecting the highway should avoid creating a shortfall to existing on-street parking conditions.

6.52 In addition to this, Paragraph 7.9 of Camden's Transport CPG specifies that the Council will resist development that negatively impacts on existing on-street parking conditions and will not approve

applications for planning permission that would cause or exacerbate unacceptable parking pressure or add to existing parking, waiting and loading problems.

Assessment – Loss of Car Parking

On-Site Car Parking

- 6.53 The majority of the ground floor of GUH is comprised of undercroft car parking and loading dock. The proposal will remove these car parking spaces and develop commercial accommodation, providing an active ground floor frontage along Kentish Town Road. This is considered to be a significant enhancement to the local area, which currently is an unattractive pedestrian environment and the car park has experienced anti-social behaviour.
- 6.54 12 of the spaces are leased to residents of the Grand Union Walk dwellings whilst 21 are allocated to Grand Union House. It has been agreed that the 12 Grand Union Walk car parking spaces and one car parking space for GUH will be relocated to basement level as part of Sainsbury's general upgrade works to their car park. The remaining 20 existing car parking spaces will be removed and will not re-provided.
- 6.55 The loss of car parking on-site is considered to be acceptable, particularly given the site's highly accessible location in Camden Town. Camden Policy T2 states that the Council will limit the availability of parking and require new development in the borough to be car free. Draft London Plan Policy T6 seeks car-free development and Policy T1 for proposals to make the most effective use of land.
- 6.56 Otherwise, the existing Sainsbury's access, service arrangements and car parking will not be affected by the application.

On-Street Car Parking

- 6.57 The scheme proposes the widening of the existing footway along Kentish Town Road and provision of new trees and planting, to provide a new high-quality pedestrian environment. This land is under the ownership of Camden highways authority and so these works will be subject to a future Section 278 Agreement. The 10 existing on-street car parking spaces will be reduced to four spaces (including one blue badge space) and a new servicing bay.
- 6.58 Located on a secondary frontage in Camden Town Centre, the site is in a highly accessible location next to the tube station. Currently the Kentish Town Road pavement provides an unattractive pedestrian route due to the existing undercroft car parking, on-street parking bays and lack of greenery.
- 6.59 The proposal will activate this frontage by introducing new commercial units and providing views through to the Sainsbury's service yard via the new office accommodation. There will also be room for the provision of outdoor seating associated with the commercial uses. The draft Site Allocation (IDS8) supports this approach stating that development must activate the ground floor along Kentish Town Road through infill development that complements Camden Town Centre's retail character and supported by improvements to the public realm surrounding the site. Paragraph 10.83 of the supporting text outlines that the Council will also seek improvements to the public realm immediately to the front of the site to provide a more attractive space, both for people visiting the site and passers-by.
- 6.60 The development will encourage further pedestrian footfall on this part of Kentish Town Road. Other initiatives in the local area will bring further activity and vibrancy, and reinforce its key role in the town centre, including the provision of a 'Streetry' on Buck Street and the new tube station entrance.

- 6.61 The development will play a key role in delivering this regeneration and improvements to the public realm. The new landscaping will improve the street environment and have sustainability benefits. Camden Local Policy D1 requires development to incorporate high quality landscape design and maximise greening through planting of trees and other soft landscaping. Camden Policy CC2 states that development should encourage resilience to climate change by incorporating green features and measures to reduce the impact of urban overheating. The proposed new trees and planting will contribute to achieving these objectives by providing landscaping, SUDS features and an improved pedestrian environment.
- 6.62 An enhanced pedestrian environment is supported by Policy T1 which confirms that the Council will promote sustainable transport by prioritising walking, cycling and public transport in the borough. In particular, the policy states that the pedestrian environment will be improved and high-quality footpaths wide enough for expected users, will be provided with seating, landscaping and other public realm improvement works. This approach is reinforced by Policy A2 which gives priority to securing new public open space as part of developments, and Policy A4 which expects developments to incorporate additional trees and vegetation wherever possible and seeks improved opportunities for nature where such opportunities are lacking.
- 6.63 Whilst there will be a reduction in on-street car parking, this is considered to be acceptable given that Policy T2 confirms that the Council will limit the availability of parking and support the redevelopment of existing car parks for alternative uses. In particular paragraph 10.19 outlines that land is an important resource and the Council will therefore support the development of parking spaces for alternative uses. Policy T4 also encourages the movement of goods and materials by canal, rail, and bicycle rather than by car.
- 6.64 Paragraph 6.9 of the Local Plan outlines that development should avoid creating a shortfall to existing on-street parking conditions. Camden's draft Transport CPG provides further detail with Paragraph 7.9 outlining that the Council will resist development that negatively impacts on existing on-street parking conditions and will not approve applications for planning permission (or for highways consent) that would cause or exacerbate unacceptable parking pressure or add to existing parking, waiting and loading problems. However, it is clear within both the Local Plan and draft Transport CPG that the default position is for a reduction in car parking. Paragraph 5.36 of the draft CPG confirms that that whilst existing car parking spaces can help to support the functions of town centres, development is required to be car-free development except for essential provision. It therefore notes that a robust case would need to be made for the retention of existing parking provision.
- 6.65 Overall, the provision of enhanced public realm through widened footpaths, a new vehicle servicing bay and new landscaping is considered to deliver significant benefits to the Town Centre. This location's importance as a pedestrian environment will increase with the Buck Street 'Streatery' and new station entrance, and as a direct result of the development. Therefore, the new Kentish Town Road frontage will be an important enhancement. The loss of on-street car parking is considered to be appropriate given the site's highly accessible town centre location, and as policy is clear that there should be a reduction in car parking.

Design & Landscaping

- 6.66 Draft London Plan Policy D3 requires all development to make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth, and existing and planned supporting infrastructure capacity. All development proposals should:

- enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale;
- encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking;
- facilitate efficient servicing and maintenance of buildings and the public realm, as well as deliveries, that minimise negative impacts on the environment
- achieve safe, secure and inclusive environments
- provide active frontages
- deliver appropriate outlook, privacy and amenity
- provide conveniently located green and open spaces
- help prevent or mitigate the impacts of noise and poor air quality
- respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character
- be of high quality, with architecture that pays attention to detail,

6.67 Draft London Plan Policy D5 requires development proposals to achieve the highest standards of accessible and inclusive design. Design and Access Statements, submitted as part of development proposals, should include an inclusive design statement.

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

Landscaping

6.69 Camden Local Plan Policy D1 (k) advises that development should incorporate high quality landscape design (including public art, where appropriate) and maximise opportunities for greening.

6.70 Camden Local Plan Policy A3 outlines that the Council will assess developments against their ability to realise benefits through biodiversity through the layout, design and materials used in the built structure and landscaping elements of a proposed development. Proposals which seek to improve opportunities to experience nature, in particular where such opportunities are lacking will be supported.

6.71 The supporting policy text at paragraph 7.22 within the Camden Local Plan advises that Camden will expect development schemes to provide a high standard of landscape design and encourages the development of green and brown roofs and walls. The design of new hard and soft landscaping should be contextual and consider access requirements.

Assessment - Design

6.72 Many of the principles of the proposed design were established in the 2018 application, namely the increase in height and massing, active ground floor uses and introduction of residential units.

However, with the listing of the adjoining Grand Union Walk dwellings and Sainsbury's supermarket a revised design approach was considered appropriate, one that also sought to incorporate sustainability at the heart of the proposal.

- 6.73 The current proposal continues to increase the height of GUH by two storeys and 16 Kentish Town Road to four storeys. The increase in massing is as a result of rigorous assessment of daylight/sunlight and impact on local amenity to ensure it is appropriate. However, the building will come forward with the principles of High-Tech architecture, complementing the rest of the Grimshaw Campus, with extensive use of glazing and reflective metals, the activities within the new GUH building will be visible, including plant rooms, stairs and cycle stores, bringing new activity and vitality to Kentish Town Road and the service yard. The service yard will also be enhanced with new views through the building, providing visual linkages and removing the inhospitable undercroft parking and loading dock areas.
- 6.74 The GUH building will be further enlivened through the provision of openable windows, screens and the inclusion of a three-storey landscaped green house over the undercroft access to the service yard. To the south a new roof terrace will be provided at third floor. At roof level, a lower profile roof is introduced with a zigzag building line, providing interest whilst ensuring an appropriate relationship with Kentish Town Road. The triangular terraces will be planted. As a result, landscaping will permeate the entire GUH building.
- 6.75 The residential-led block at 16 Kentish Town Road continues the principles of High-Tech design with large windows, glazing and metal treatment; however, the large windows balanced with areas of solidity to ensure privacy for occupants. The fenestration treatment and cladding successfully mediates between GUH and brick buildings to the south.
- 6.76 The proposal has taken a design-led approach to respond to local context and architecture, and protect local amenity, whilst ensuring a high-quality proposal that will enliven this key part of Camden Town. The proposal is therefore considered to comply with Camden Local Plan Policy D1 and draft London Plan Policies D3 and D5.

Assessment – Landscaping

- 6.77 As outlined above, the current public realm is unattractive and there have been significant issues with anti-social behaviour. Key enhancements will include the provision of an open and active frontage, and the widening of the undercroft access to the rear service yard, both of which will promote passive surveillance of the public realm.
- 6.78 Landscaping works to Kentish Town Road will be subject to a Section 278 Agreement but the proposal includes the widening of the existing footway to promote pedestrian movements, introduction of extensive planting including SUDS features and new trees. Four on-street car parking spaces will be re-provided and a new servicing bay.
- 6.79 The undercroft and the immediate area of the rear servicing yard will be enhanced with new lighting features, new and refurbished paving, and new areas of planting. This works will be delivered in conjunction with Sainsbury's and form part of a wider master plan for the service yard. As a result, it will be cohesive with any future works and ensure the continued operation of the service yard and access/egress to the Sainsbury's car parking areas.
- 6.80 Opportunities for urban greening have been maximised and the proposal will complement wider proposals including the new tube entrance at Buck Street and proposals for a 'streatery' at Buck Street. Kentish Town Road will be a key route linking the forthcoming Camden High Line with

Camden Town and the proposal will complement this scheme through the provision of a new green and widened pedestrian route.

- 6.81 Given the history of anti-social behaviour, security has been central to the design with increases in passive surveillance, improved lighting and removal of features that would hide activities from sight.
- 6.82 Landscaping will permeate the building itself with an internal green house and planted roof terraces providing both a high-quality office environment but also a green activation of all Kentish Town Road. Whilst one tree will be removed as part of the proposal, it is considered to be appropriate given the extensive new landscaping proposal and as its removal will facilitate the development of the new residential building. Accordingly, the proposal is in accordance with Camden Local Plan Policy A2, by promoting biodiversity, and Policy D1 by maximising landscaping and opportunities for greening.

Townscape & Heritage

- 6.83 Draft London Plan Policy HC1 requires development proposals which affect heritage assets should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.
- 6.84 Draft London Plan Policy D3 notes that development must respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character.
- 6.85 At the local level, Camden Local Plan Policy D2 states that the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas.
- 6.86 At paragraph 7.46, supporting Policy D2, states that in order to preserve or enhance important elements of local character, the factors that create that character must be considered. In determining applications for development in conservation areas the London Borough of Camden will seek to manage change in a way that retains the distinctive character of the area and expect new development to contribute positively to this process. To support this process the London Borough of Camden has prepared conservation area appraisals for each conservation area.
- 6.87 Camden Local Plan Policy D2 states that designated heritage assets include conservation areas and listed buildings and the Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss.
- 6.88 Policy D2 of the Camden Local Plan goes on to state that conservation areas are designated heritage assets and that in order to maintain the character of Camden's conservation areas, the Council will take account of conservation area statements, appraisals, and management strategies when assessing applications within conservation areas. The Council will require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area. Similarly, the Council will resist development that would cause harm to significance of a listed building through an effect on its setting.

- 6.89 The Regent's Canal Conservation Area Appraisal advises that "the special character of the area is largely derived from the almost hidden nature of the canal. The surrounding townscape largely turns its back on the canal creating a tranquil space distinct from the business of the surrounding city".

Assessment – Townscape

- 6.90 The proposal will increase the height of existing buildings on site by two and three storeys. Draft London Plan Policy D3 states that development should respond to the local character of an area and respect heritage assets, nevertheless, it also confirms that development must make the best use of land by following a design led approach that optimises the capacity of sites.
- 6.91 It is considered that the existing buildings do not currently make best use of the site, particularly given the site area and its relationship with Kentish Town Road, and its highly accessible location in Camden Town. Accordingly, the design has optimised the site through the conversion of the existing ground floor car parking, introduction of a mezzanine level and a sensitive increase in height. The top floor will be set back from the main building frontage utilising a zigzag pattern that will add interest and relief to the elevation.
- 6.92 The accompanying Townscape and Visual Assessment considers the proposed development from 14 viewpoints in the local area. These viewpoints have been agreed with Council officers who also requested that the assessment of a further (15th) view is undertaken, which will be provided as an addendum. Overall the design has sensitively considered adjoining buildings and heritage assets, and will not detract from their setting. Indeed, from certain viewpoints the development will become a new local landmark and townscape feature, enhancing this part of Kentish Town Road and the town centre.
- 6.93 The Assessment concludes that the overall massing will result in a well-articulated composition that responds positively to the shape of the site and its existing context. The articulation adopted ensures comfortable proportions and a clear identity for the mix of uses. The extensive public realm works will benefit the building's setting.
- 6.94 Accordingly, the proposal successfully balances the need to optimise development and respect local context, as required by draft London Plan Policy D3, and whilst appropriately safeguarding local views and heritage assets as sought by Camden Policy D2.

Assessment - Heritage

- 6.95 The majority of the site is within the Regent's Canal Conservation Area and the southern extent of the site (i.e. 16 Kentish Town Road) remains within the Camden Town Conservation Area. None of the buildings within the application site are listed, however there are several listed and locally listed buildings nearby.
- 6.96 The accompanying Heritage Assessment outlines that whilst part of the wider Grimshaw Campus, the site is the least successful element of the scheme. It is built of a standard concrete-frame construction with nothing exceptional about the spans or the engineering. The building presents a hostile frontage to Kentish Town Road with a large expanse of inactive ground floor usage and an environment dominated by vehicles. The lack of active frontage has encouraged graffiti, drug taking and anti-social behaviour, and as one of the main entrances to the supermarket presents an undesirable approach. Internally, the thin walls mean that occupiers are subject to great variety of temperature – either very cold in the winter or very hot in the summer. Many of the materials used were not of a high quality and are in need of replacement. Therefore, the demolition of the existing building is considered to be appropriate.

6.97 In terms of the proposed design, it is of a high quality that responds well to the character of the surrounding context. The massing is appropriate and design detail well-articulated. Key benefits will be introduced including new high quality commercial and residential accommodation, enhanced public realm and landscaping, and an attractive design that embraces the principles of sustainability and the spirit of High-Tech design.

6.98 As a result, the report concludes that the proposal will enhance the setting of the surrounding heritage assets and Conservation Area, and it is therefore considered that it is compliance with Camden Local Plan Policy D2 and draft London Plan Policies HC1 and D3.

Transport & Servicing

6.99 Draft London Plan Policy T1 expects all development to make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking, and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated. In addition to this, the policy supports development proposals that facilitate the delivery of the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle, or public transport by 2041.

6.100 Draft London Plan Policy T2 requires development proposals to reduce the dominance of vehicles on London's streets whether stationary or moving and be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport.

6.101 Draft London Plan Policy T5 supports development proposals which encourage cycling by securing the provision of appropriate levels of cycle parking which should be secure, well-located and at least in accordance with the minimum standards, ensuring that a minimum of two short-stay and two long-stay cycle parking spaces are provided.

6.102 Draft London Plan Policy T5 specifies that cycle parking should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards and where it is not possible to provide adequate cycle parking within residential developments, boroughs must work with developers to propose alternative solutions which meet the objectives of the standards

6.103 At the local level Camden Local Plan Policy T1 prioritises walking, cycling and public transport in the borough. In pursuance of this Camden will seek to ensure developments improve the pedestrian environments and ensure that development provides for accessible, secure cycle parking facilities exceeding minimum standards outlined within the London Plan (Table 6.3) and design requirements outlined within Camden's Transport CPG.

6.104 Camden Local Plan Policy T2 states that the Council will limit the availability of parking and require new development in the borough to be car free.

6.105 Draft London Plan Policy T7 states that development proposals should facilitate safe, clean, and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible.

6.106 Construction Logistics Plans and Delivery and Servicing Plans will be required and should be developed in accordance with Transport for London guidance and in a way which reflects the scale and complexities of developments.

6.107 Camden Local Plan Policy A1 resists development proposals that fail to adequately assess and address transport impacts having regard to the use of Transport Assessments, Travel Plans and Delivery and Servicing Management Plans.

- 6.108 As the proposals will result in the loss of on-street parking, the supporting policy text (paragraph 6.9) of Camden Local Plan Policy A1 is applicable and states that any development affecting the highway should avoid creating a shortfall to existing on-street parking conditions.
- 6.109 In addition to this, Paragraph 7.9 of Camden's Transport CPG specifies that the Council will resist development that negatively impacts on existing on-street parking conditions and will not applications for planning permission that would cause or exacerbate unacceptable parking pressure or add to existing parking, waiting and loading problems.

Assessment – Transport & Servicing

- 6.110 The Transport Assessment includes analysis of the likely impact on local pedestrian, cycle, public transport and highways networks, and concludes that overall, the impact will be acceptable. The pedestrian environment will be improved through the widening of footways and new landscaping, public and private cycle parking will be provided, and the site is in a highly sustainable public transport location. The proposal supports 'Healthy Streets' aspirations within the draft London Plan.
- 6.111 In terms of road impact, the proposal will result in a reduction of 16 and 15 private vehicle trips during the AM and PM peak hours respectively. The loss of on-site car parking is considered to be acceptable and is supported by Camden Policy T2 and draft London Plan Policy T6. Long and short stay cycle parking will be provided in accordance with draft London Plan standards, and occupants of the employment space will have access to shower and locker facilities.
- 6.112 The proposal will result in the loss of six on-street car parking spaces. An assessment against policy of the loss of these spaces is outlined earlier in this section and concludes that policy supports the reduction of parking, particularly where it would deliver urban greening and enhancements to the local public realm. The Transport Strategy further finds that this would be appropriate and that the introduction of a serving bay will benefit this location. Four car parking spaces will be retained, including one blue badge space. The new on-street servicing bay will facilitate waste collection for the new residential dwellings and benefit the wider Town Centre.
- 6.113 Cycle parking stands will be provided on the public pavement along Kentish Town Road. Whilst policy seeks for on-street cycle parking to be provided on-site, this arrangement is considered to be acceptable. A key objective of the emerging site allocation is to promote a usable public realm and reduce opportunities for crime and anti-social behaviour. The location of cycle parking stands would reduce the usable area within the new on-site public realm. Furthermore, although passive surveillance is increased, the service yard and undercroft are inherently less visible and so would provide greater opportunity for the theft of cycles.
- 6.114 The proposal is also supported by a Waste Management Strategy, Delivery and Servicing Management Plan, and a Travel Plan. Furthermore, it has been designed to ensure that it will not affect the existing access, parking and servicing arrangements of the rear service yard and to complement the wider Sainsbury's masterplan.
- 6.115 Accordingly, the proposed development is considered to be in compliance with both Camden and draft London Plan policies.

Residential Unit Mix & Affordable Housing

Unit Mix

- 6.116 Draft London Plan Policy D3 states that all development must make the best use of land by following a design led approach that optimises the capacity of sites.

- 6.117 Camden Local Plan Policy H6 aims to create mixed, inclusive and sustainable communities by requiring a range of dwelling sizes for Camden's existing and future households.
- 6.118 Camden Local Plan Policy H7 aims to secure a range of homes of different sizes that will contribute to creation of mixed, inclusive and sustainable communities and reduce mismatches between housing needs and existing supply. In order to do this the Council will ensure that all housing developments contribute to meeting the priorities set out in the Dwelling Sizes Priorities Table and include a mix of large and small homes. The Council will take a flexible approach to assessing the mix of dwelling sizes proposed in each development having regard to:
- any evidence of local needs that differ from borough wide priorities.
 - the character of the development, the site and the area, including the impact of the mix on child density.
 - site size, and any constraints on developing the site for a mix of homes of different sizes.
 - the economics and financial viability of the development including any particular costs associated with it, having regard to any distinctive viability characteristics of particular sectors such as build-to-let housing.

Affordable Housing

- 6.119 Draft London Plan Policy H5 states that the threshold level of affordable housing for development proposals which are capable of delivering more than ten units or which have a combined floor space greater than 1,000sqm is set at 35%.
- 6.120 Draft London Plan Policy H4 notes that affordable housing must only be provided off-site or as a cash in lieu contribution in exceptional circumstances.
- 6.121 Camden Local Plan Policy H4 states that the Council will aim to maximise the supply of affordable housing and exceed the borough wide strategic target of 5,300 additional affordable homes from 2016/17 – 2030/31 and will aim for an appropriate mix of affordable housing types to meet the needs of households unable to access market housing. Camden Local Plan Policy H5 specifies that the Council will aim to secure sufficient high-quality affordable homes of different types and sizes to meet the needs of existing and future Camden households.
- 6.122 Camden Local Plan Policy H4 requires a contribution to affordable housing from all developments that provide one or more additional homes and involve a total addition to residential floorspace of 100sqm GIA or more. The Council will seek to negotiate the maximum reasonable amount of affordable housing. Where affordable housing cannot practically be provided on site, or offsite provision would create a better contribution (in terms quantity and/ or quality), the Council may accept provision of affordable housing offsite in the same area, or exceptionally a payment-in-lieu.
- 6.123 The Council will take into account the character of the development, the site and the area; site size and any constraints on developing the site for a mix of housing including market and affordable housing and financial viability of the development when considering the appropriate provision.

Assessment –Unit Mix

- 6.124 The residential component of the development comprises six units: three x 1 bed 2 person and three x 2 bed 4 person flats, including one wheelchair unit. This unit mix is considered to be appropriate as it provides a range of unit sizes whilst optimising the number of residential dwellings on site. Furthermore, a mix of small units is appropriate given the site's town centre location.

Assessment – Affordable Housing

- 6.125 Camden Policy H4 seeks a contribution towards affordable housing from new developments, including where a Payment-in-Lieu is made of housing provision in accordance with Policy H2. Consideration of affordable housing will form part of the discussions on financial viability with the Council.

Residential Amenity

- 6.126 Draft London Plan Policy D6 expects proposals to maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings.
- 6.127 Draft London Plan Policy D7 notes that proposals for residential development must provide suitable housing for London's diverse population. Proposals must ensure that at least 10 per cent of dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(3) 'wheelchair user dwellings' and all other dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building M4(2) 'accessible and adaptable dwellings'.
- 6.128 Camden Local Plan Policy H6 requires secure high-quality accessible homes in all housing developments. All self-contained homes must meet the nationally described space standards and 90% of new-build self-contained homes in each development to be accessible and adaptable in accordance with Building Regulation M4(2). A total of 10% of new-build self-contained homes in each development must be suitable for occupation by a wheelchair user or easily adapted for occupation.
- 6.129 In terms of residential amenity space provision, The Camden Housing CPG (2018) Chapter 4 refers to the Mayor's Housing SPG (2016) Standard 26 and 27 which requires a minimum of 5sqm of private outdoor space per one-two person unit with an extra 1sqm per additional occupant. The minimum depth and width for private amenity space is 1500mm.

Assessment – Residential Amenity

- 6.130 All residential units will meet the National Described Spatial Standards in terms of overall floor area, storage, and bedroom sizes. Each unit will also have a private balcony that meets draft London Plan standards. The units will avail of communal sheltered and secure bin and cycle stores. The units have been designed to ensure appropriate levels of light, outlook, and amenity

Neighbouring Amenity

Privacy & Outlook

- 6.131 In relation to new housing development, Standard 28 of the Mayor's Housing SPG requires habitable rooms within each dwelling to be provided with an adequate level of privacy in relation to neighbouring property, the street and other public spaces.
- 6.132 Supporting paragraph 2.3.36 of the Mayor's Housing SPG states that designers should consider the position and aspect of habitable rooms, gardens, and balconies, and avoid windows facing each other where privacy distances are tight. The SPG states that in the past, planning guidance for privacy has been concerned with achieving visual separation between dwellings by setting a minimum distance of 18 – 21m between facing homes (between habitable room and habitable room as opposed to between balconies or terraces or between habitable rooms and balconies/terraces). The SPG states that these can still be useful yardsticks for visual privacy but adhering rigidly to

these measures can limit the variety of urban spaces and housing types in the City, and can sometimes unnecessarily restrict density.

- 6.133 At the local level, Camden Local Plan Policy A1 advises that the Council seek to protect the quality of life of occupiers and neighbours. In doing so, they will grant permission for development unless this causes unacceptable harm to amenity. In achieving this, the Council will consider the impact development proposals would have on visual privacy and outlook.
- 6.134 The Camden Amenity CPG (2018) paragraph 7.4 advises that *“development should be designed to protect the privacy of both new and existing dwellings to a reasonable degree. Spaces that are overlooked lack privacy, therefore, new buildings, extensions, roof terraces, balconies and the location of new windows should be carefully designed to avoid overlooking”*.

Daylight & Sunlight

- 6.135 Paragraph 123 of the National Planning Policy Framework (NPPF) (2019) outlines that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site. It states that in these circumstances:

“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).”

- 6.136 Draft London Plan Policy D6 specifies that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.
- 6.137 Camden Local Plan Policy A1 seeks to protect daylight/sunlight values within existing and proposed development. The supporting policy text (paragraph 6.5) states that in assessing daylight/sunlight values Camden will take into account the most recent guidance published by the Building Research Establishment (currently the Building Research Establishment’s Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice 2011).
- 6.138 The Building Research Establishment (BRE) document Site Layout Planning for Daylight and Sunlight (2011) sets out guidance for achieving good sunlight and daylight levels within buildings and the open spaces between them.
- 6.139 The BRE guidelines are not mandatory, though local planning authorities will consider the suitability of a proposed scheme for a site within the context of BRE guidance. Consideration will be given to the urban context within which a scheme is located.
- 6.140 In regard to daylight and sunlight Camden’s Amenity CPG states that they will:
- Expect all buildings to receive adequate daylight and sunlight.
 - Daylight and sunlight reports will be required where there is potential to reduce existing levels of daylight and sunlight.

Noise

- 6.141 Camden Local Plan Policy A4 advises that the Council seek to manage noise and vibration within the Borough. As such, development will only be permitted where it can operate without causing harm to amenity. In pursuance of this development should have regard to Camden's noise and vibration thresholds set out at appendix 3 of the Camden Local Plan.
- 6.142 Draft London Plan Policy D13 expects development proposals to be designed to ensure that established noise and other nuisance-generating uses remain viable and can continue or grow without unreasonable restrictions being placed on them. New noise generating development proposed close to residential and other noise-sensitive uses should put in place measures to mitigate and manage any noise impacts for neighbouring residents and businesses.
- 6.143 The policy goes on to state that development proposals should manage noise and other potential nuisances by ensuring good design mitigates and minimises existing and potential nuisances generated by existing uses and activities located in the area. Separating new noise-sensitive development where possible from existing noise-generating businesses and uses through distance, screening, internal layout, sound-proofing, insulation and other acoustic design measures is supported.

Construction Period

- 6.144 Camden Local Plan Policy A1 provides guidance on managing the impacts of development and specifies that the Council will consider the impacts of the construction phase, including the use of Construction Management Plans to ensure that the quality of life of occupiers and neighbours is protected.
- 6.145 Camden Local Plan Policy A3 requires the demolition and construction phase of development, including the movement of works vehicles, to be planned to avoid disturbance to habitats and species and ecologically sensitive areas.
- 6.146 The supporting policy text (paragraph 6.14) specifies that the Council will require Construction Management Plans for major development proposals in order to identify the potential impacts of the construction phase and how any potential negative impacts will be mitigated. Paragraph 6.16 notes that Construction Management Plans will usually be required via planning obligations once the planning application has been approved.
- 6.147 Draft London Plan Policy (Part G) states that Construction Logistics Plans will be required and should be developed in accordance with Transport for London guidance . Part K of the policy notes that during the construction phase of development, inclusive and safe access for people walking or cycling should be prioritised and maintained at all times.

Assessment – Privacy & Outlook

- 6.148 The development has been designed to protect neighbouring privacy and outlook. To the north, the Grand Union Walk dwellings have no windows on the south elevation facing the site. Each property has a roof terraces but these already experience a degree of overlooking from neighbouring properties and the surrounding town centre. The terraces do not serve habitable rooms and so are less sensitive. Nevertheless, there are limited views of these terraces from the proposed office space. Furthermore, the proposed increase in height will not result in a loss of outlook from these terraces.
- 6.149 To the south east is Barnes House, a residential block of flats. The proposed office floorspace has been designed so that there are no direct views of these properties. The southern roof terrace will

be screened by planted pergolas. There roof terraces at fourth floor level will be planted with any accessible areas set back from the balustrade.

- 6.150 The new dwellings at 16 Kentish Town Road will open on to the Barnes House dwellings; however, both the existing and proposed flats will be screened by balconies. The balconies at Barnes House are walkways shared between flats and so there are no private amenity spaces. The new residential block will be three storeys taller than the existing structure; however, this will be in line with the adjoining terrace immediately to the south and appropriate optimises development in this key town centre location.
- 6.151 To the east of GUH is the existing Sainsbury's and service yard, and therefore no sensitive uses. To the west, the buildings run along Kentish Town Road and the proposal will continue the existing cross-street relationship in this location.
- 6.152 Accordingly, the development will appropriately safeguard neighbouring privacy and outlook.

Assessment – Daylight & Sunlight

- 6.153 As outlined above, daylight and sunlight has been fundamental in shaping the proposed height and massing. The site is a central and highly accessible urban location, therefore Policy D3 of the draft London Plan states that in such locations development should be optimised. The NPPF also confirms that schemes should make optimal use of the potential of each site and accordingly there is to be flexibility when considering impacts on light.
- 6.154 An assessment has accordingly been undertaken of 11 neighbouring properties against BRE Guidelines, including Barnes House to the south east and Grand Union Walk to the north east. The accompanying report confirms that the development will be fully BRE compliant and the proposal is therefore in accordance with planning policy.

Assessment – Noise

- 6.155 An Acoustic Report has been submitted with the application. It outlines recommendations for the acoustic specification of the building fabric to ensure an appropriate sound environment for users and specifies the appropriate level of acoustic attenuation for any plant to protect the amenity of the wider area.

Assessment – Construction Period

- 6.156 The accompanying draft Construction Management Plan outlines that the development will operate in accordance with Camden's minimum requirements. The strategy will be secured post-planning in advance of construction works being undertaken on site.
- 6.157 Accordingly, the design of the proposal ensures that local privacy, outlook and daylight/sunlight are appropriately safeguarded, whilst detailed strategies will protect against noise and construction activities. The impact on neighbouring amenity is therefore considered to be acceptable.

Open Space

- 6.158 Draft London Plan Policy G1 supports the enhancement of London's network of green and open space and requires development proposals to incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network.

- 6.159 Draft London Plan Policy G4 specifies that development proposals should not result in the loss of protected open space and should, where possible, create areas of publicly accessible open space, particularly in areas of deficiency.
- 6.160 Part G of the Draft London Plan Policy GG3 requires all development to plan for improved access to and quality of green spaces, the provision of new green infrastructure, and spaces for play, recreation, and sports.
- 6.161 Camden Local Plan Policy A2 seeks to protect and enhance access to open space and green infrastructure within the borough. Part (m) of the policy states that new development proposals will be required to provide 9 sqm per occupant for residential schemes and 0.74 sq.m per worker, while taking into account any funding for open spaces through the Community Infrastructure Levy.
- 6.162 Part (n) of the policy specifies that priority will be given to *“securing new public open space on-site, with provision off-site near to the development only considered acceptable where provision on-site is not achievable. If there is no realistic means of direct provision, the Council may accept a financial contribution in lieu of provision”*.
- 6.163 The Public Open Space CPG (January 2021), paragraph 1.6 sets out the circumstances where development will be required to contribute towards open space and play facilities. Only residential schemes which propose 11 or more additional dwellings or exceeds 1,000sqm (gross internal area) are required to make a contribution towards open space and play facilities.

Assessment – Open Space

- 6.164 Accordingly to Camden Policy A2, 0.74 sq.m of open space is required per worker for commercial development. Camden’s Public Open Space CPG confirms that the six residential units are not required to contribute towards open space and play facilities.
- 6.165 There is a net uplift of employment space on site is 3,582 sq.m NIA, which is intended to be corporate office. The HCA Employment Density Guide (November 2015) contained within Camden’s CPG confirms that such office accommodation has an employment density of one worker per 13 sq.m NIA of floorspace. Therefore there would be an additional 276 office workers on site.
- 6.166 Accordingly, Policy A2 would seek 204 sq.m of new public open space.
- 6.167 Whilst the existing undercroft access to the rear service yard and the service yard itself is publicly accessible, the poor condition of this environment and lack of landscaping features means that these areas do not provide public open space that is usable as amenity. The footway to the front of the site is also a poor quality environment, dominated by on-street parking and the inactive frontage of the undercroft parking.
- 6.168 As outlined above, the proposal will undertake public realm improvements to all of these areas bringing them into active use through the creation of an environment that will encourage pedestrian movement and a usable public realm. Accordingly, the proposal will increase open space provision of 560 sq.m in the undercroft/service yard and 717 sq.m on the public footway, 1,277 sq.m in total.
- 6.169 Therefore the provision of Public Open Space exceeds that sought by Camden Policy A2.

Energy, Sustainability & Overheating

- 6.170 Draft London Plan Policy GG6 states that those involved in planning and development must seek to improve energy efficiency and support the move towards a low carbon circular economy, contributing towards London becoming a zero-carbon city by 2050.

- 6.171 Draft London Plan Policy SI2 requires a minimum on-site reduction of at least 35% beyond Building Regulations, with any shortfall in meeting the zero-carbon target to be met through a cash in lieu contribution to the borough's offset fund.
- 6.172 At the local level, Camden Local Plan Policy CC1 requires all development to minimise the effects of climate change and encourages all development to meet the highest feasible and viable environmental standards. Moreover, all development is required to reduce carbon dioxide emissions in line with the targets set out within the London Plan.
- 6.173 In support of these objectives Camden requires the location of development and mix of land uses to minimise the need for car travel, support energy efficiency improvements to existing buildings and the optimisation of energy efficiency.
- 6.174 Camden Local Plan Policy CC2 advises that development should adopt appropriate climate change adaption measures and requires any development involving 5 or more residential units or an increase of floor space of 500sqm to, where appropriate; protect existing and promote new green infrastructure; maintain and where possible reduce surface water run-off and incorporate bio-diverse roofs and green walls. Measures should also be included to reduce the impact of urban and dwelling overheating, including application of the cooling hierarchy.
- 6.175 In assessing the sustainable design and construction of development the Council will promote and consider the following
- how adaptation measures and sustainable development principles have been incorporated into the design and proposed implementation;
 - encourage new build residential development to use the Home Quality Mark and Passivhaus design standards;
 - encouraging conversions and extensions of 500sqm of residential floorspace or above or five or more dwellings to achieve "excellent" in BREEAM domestic refurbishment; and
 - expecting non-domestic developments of 500sqm of floorspace or above to achieve "excellent" in BREEAM assessments and encouraging zero carbon in new development from 2019.
- 6.176 Camden Local Plan Policy CC5 specifies that the Council will seek to make Camden a low waste borough by reducing the amount of waste produced in the borough and increase recycling and the reuse of materials to meet the London Plan targets of 50% of household waste recycled/composted by 2020 and aspiring to achieve 60% by 2031. The Council will achieve this by ensuring that developments include facilities for the storage and collection of waste and recycling.
- 6.177 The Mayor's Sustainable Design and Construction SPG (2014) advises that Developments should contribute to ensuring resilient energy infrastructure and a reliable energy supply, including from local low and zero carbon sources. It also sets out the following design measures for improving the sustainability of developments:
- optimise natural daylight;
 - optimise solar gain;
 - optimise insulation;
 - optimise air tightness;

- optimise thermal mass;
- Incorporate green infrastructure;
- Maximise potential for natural ventilation

Assessment – Energy & Sustainability

- 6.178 Sustainability and well-being have been fundamental to the design of the proposal. Much of the building's existing structure has been retained, reducing demolition waste and the need for concrete. Extensive planting and landscaping are included in the proposal and the natural ventilation has been incorporated with openable windows to the employment space.
- 6.179 The accompanying Landscaping Statement confirms that the proposed area of external planting will be 1,770 in total (against a site area of 3,003 sq.m), a figure which excludes the internal greenhouse planting (65 sq.m). Accordingly, the Urban Green Factor score for the development is 0.31 and the new planting will support local biodiversity in an environment that currently has little greenery.
- 6.180 The accompanying Energy Strategy confirms that there will be a 54.9% on-site carbon reduction against Building Regulations, significantly exceeding the draft London Plan target of 35%. A range of sustainability measures are incorporated into the development including a Variable Refrigerant Flow (VRF) system, PV panels and Air Source Heat Pumps. Energy efficient lighting and mechanical equipment will be used. The BREEAM Pre-Assessment Report confirms that a BREEAM score of 87.62% is targeted, an Outstanding rating. Furthermore, a potential score of 91.49% has been identified. The draft London Plan seeks zero carbon performance and any shortfall can be offset through a payment in-lieu. This has been calculated to be £102,001, subject to viability.
- 6.181 As a result, the proposal complies with Camden Local Plan Policies CC1 and CC2, and the standards within the draft London Plan.

Assessment – Overheating

- 6.182 The Energy Strategy includes an assessment of residential overheating. A number of design measures reduces the risk of overheating, in particular the location of the bedrooms on the eastern side of the dwellings. It concludes that when natural ventilation is applied the development complies with the relevant standards. The units will also be provided with mechanical ventilation.

Air Quality

- 6.183 Camden Local Plan Policy CC4 states that London Borough of Camden will ensure that the impact of development on air quality is mitigated and that exposure to poor air quality is reduced in the borough. When assessing development proposals consideration will be taken to the actions identified in the Council's Clean Air Action Plan.
- 6.184 Camden Amenity Planning Guidance states that all of Camden is a designated Air Quality Management Area due to the high concentrations of nitrogen dioxide (NO₂) and particulate matter (PM₁₀). As such all developments are to limit their impact on local air quality. An Air Quality Assessment is required to support any scheme which proposes uses susceptible to poor air quality, such as housing.
- 6.185 The demolition and construction phases of development on air quality must be taken into account as part of planning applications. Mitigation and offsetting measures to deal with any negative air quality impacts associated with development must be implemented.

- 6.186 The London Borough of Camden has, since 2000, been designated an Air Quality Management Area. The Camden Air Quality Action Plan (2016) sets out a variety of actions to help reduce key air pollutants in the Borough arising from road traffic, gas boilers and other sources. Action 14 seeks to “minimise emissions from the construction and operation of new developments by requiring developers to adhere to current and any superseding best practice guidance and supplementary planning guidance”.

Assessment – Air Quality

- 6.187 The accompanying Air Quality Assessment considers the development’s potential air quality effects during both the construction and operational phases of the development.
- 6.188 For the construction phase impacts are associated with fugitive dust and fine particulate matter emissions; however, these can be mitigated through monitoring and good site practice, such as the use of screening and the washing of vehicles. The residual effects of the construction phase will not be significant.
- 6.189 In terms of the operational phase, annual mean nitrogen dioxide concentrations across the site are likely to exceed the relevant standards; however, again effective mitigation measures will be introduced including cycle parking provision and a Travel Plan for commercial occupiers.
- 6.190 Finally, the development will be Air Quality Neutral in accordance with draft London Policy SI1.

Flood Risk & Drainage

- 6.191 Camden Local Plan Policy CC2 advises that all development should adopt appropriate climate change adaption measures, including not increasing, and wherever possible reducing, surface water runoff through increasing permeable surfaces and use of Sustainable Drainage Systems.
- 6.192 Camden Local Plan Policy CC3 seeks to ensure that development does not increase flood risk and reduces the risk of flooding where possible. The Council will require development proposals to incorporate water efficiency measures and utilise Sustainable Drainage Systems (SuDS) in line with the drainage hierarchy to achieve a greenfield run-off rate where feasible.

Assessment – Flood Risk & Drainage

- 6.193 A Flood Risk Assessment and Outline Drainage Strategy has been prepared for the scheme.
- 6.194 The site is located within Flood Zone 1 and the development is at low risk of flooding from all sources when taking into account the effects of climate change. Nevertheless, any potential risk of flooding is further reduced through a series of design measures.
- 6.195 The proposed development of GUH will retain the existing structure up to first floor level and the basement below. As a result the structure cannot support the weight a of blue roof attenuation system and it is not possible to install any below ground attenuation tanks. The building will; however, have a green roof. Therefore the proposal will mimic existing discharge rates with no formal attenuation. Nevertheless, the areas of new landscaping will include SUDS features in the form of rain gardens, which will provide some benefit in decreasing runoff.
- 6.196 The new-build residential building will have a combined PV panel, green/blue roof that will collect surface water. Due to the site’s geology, ground infiltration would not be feasible and it is not possible to introduce a swale or discharge to the canal to the north. Therefore the restricted runoff from the blue roof will discharge into the public combined sewer network.

6.197 Therefore, the site has a low risk of flooding but sustainable drainage features will be maximised on site in compliance with Camden Policies CC2 and CC3.

Planning Obligations & Section 106 Heads of Terms

6.198 Camden Local Plan Policy DM1 states that the Council will use planning obligations, in appropriate circumstances to mitigate or compensate for the potential effects of new development. In considering planning obligations, the Council will take into account economic viability, the full range of benefits provided by a development, the extent to which it contributes towards delivering the objectives of the Local Plan and other planning policies.

6.199 Camden adopted a new Community Infrastructure Levy (CIL) Charging Schedule in October 2020. Camden's Developer Contributions CPG (March 2019) confirms that planning obligations cannot be sought to secure infrastructure projects or types of infrastructure that will be wholly or partly funded by CIL.

6.200 Camden's Local Plan outlines that obligations may be sought for the following matters. Any obligations or financial contributions will be subject to on-going financial viability discussions:

- Policy H1: affordable housing or a payment in lieu contribution of affordable housing provision.
 - i. The proposal includes six residential dwellings. The tenure of these units is subject to financial viability discussions.
- Policy H2: payment in-lieu of on-site housing provision.
 - i. This will form part of the discussions on financial viability.
- Policy E2: where provision of SME workspace has been agreed as part of a development, the Council will seek to secure this via the use of planning obligations. The Council will also seek to secure through a planning obligation an element of affordable SME workspace from large scale employment developments with a floorspace of 1,000sqm or more.
 - i. The applicant has identified market demand for the entirety of the employment floorspace proposed. The inclusion of affordable workspace would lead to a shortfall in meeting this urgent local need. Furthermore, there are other affordable workspace units in close proximity to the site that could be undermined by new accommodation coming forward. Therefore, affordable workspace is not included in the proposal.
- Policy A1 notes that any development requiring works to the highway following development will be secured through planning obligations with the Council to repair any construction damage to transport infrastructure or landscaping and reinstate all affected transport network links and road and footway surfaces. A Construction Management Plan will be secured via planning obligations between the developer and the Council once an application is approved.
 - i. The application includes enhancements to the public footway and highway through the provision of new landscaping, trees, a blue badge car parking space and new service bay. These works will be subject to a Section 278 Agreement.
 - ii. A draft Construction Management Plan is included in the proposal. A detailed strategy will be secured following the grant of planning permission.
- Policy A2 specifies that the Council will seek developer contributions for open space enhancements. The Council will apply a standard of 9 sqm per occupant for residential

schemes and 0.74 sqm for commercial developments while taking into account any funding for open spaces through CIL and any on-site provision.

- i. The application includes enhancements to the public realm including new areas of usable outdoor public amenity space in the undercroft and rear service yard. As outlined above, the 1,277 sq.m of public open space on site exceeds the 204 sq.m sought under Policy A2
- Policy CC1 specifies that all major developments will be expected to demonstrate how relevant London Plan targets for CO2 reduction, including targets for renewable energy, have been met. Where it is demonstrated that the required London Plan reductions in carbon dioxide emissions cannot be met on site, the Council will require a financial contribution to an agreed borough wide programme to provide for local low carbon projects.
 - i. Sustainability is at the heart of the proposal with much of the existing structural frame retained, natural ventilation provided and extensive new planting and landscaping. The accompanying Energy, Sustainability and BREEAM assessments confirm that the proposal meets or exceeds the relevant standards.

6.201 **Employment & Training Statement**

6.202 Camden Local Plan Policy E1 outlines that large schemes which have significant job creation potential will be expected to produce an Employment and Training Strategy to demonstrate how employment and training requirements will be addressed and supported.

6.203 This strategy will be progress post-planning once the construction design has been progressed and a site contractor appointed. An Employment and Training Strategy will be secured through the Section 106 Agreement. However, initial consideration of the strategy is outlined below.

Labour forecast

6.204 There will be approximately 700 operatives at a range of skill-level working on Grand Union House. The estimated break down of labour numbers for each phase of works is as follows:

Site Set up: 50 Operatives

Phase 1- Demolition: 200 Operatives

Phase 2 – Structure and Envelope: 250 operatives

Phase 3 - Fit-out works: 200 operatives

6.205 It should be noted that the total number of 700 may not equate to 700 unique individuals, as there will be individuals who are deployed across phases. For example, logistics operatives will work across all phases.

Apprenticeships and new opportunities

6.206 The contractor will work with partners including Kings Cross Construction Training Centre to recruit apprentices from the local area. Other partners include St Mungo's homelessness charity and schools in Camden such as Maria Fidelis School where the aim would be to recruit work experience candidates from.

- 6.207 Vacancies on the project will be advertised via Camden Job Hub to enable local people to apply; and the contractor will work with the local JobCentrePlus and other relevant organisations to prepare local candidates for work, for example offering interview preparation sessions and site visits.
- 6.208 Local businesses will be invited to tender for contracts on Grand Union House project with the goal of procuring 10% of contracts from local businesses.

Planning Summary

- 6.1 The proposal is for the high quality and sustainable development of the existing Grand Union House and 16 Kentish Town Road to provide new employment, flexible commercial and residential accommodation. The scheme is in accordance with the emerging site allocation, namely through employment-led development with six residential units, the provision of flexible commercial units and extensive public realm enhancements. It builds upon the 2018 planning application but has adapted it to ensure that sustainability is fundamental to the proposal and that it responds to the surrounding context, in particular the Grimshaw Campus.
- 6.2 Overall, the proposal is considered to be acceptable when assessed against planning policy and should be granted planning permission.

7 CONCLUSION & PUBLIC BENEFITS STATEMENT

- 7.1 Planning permission is sought from the London Borough of Camden, on behalf of Camden Mixed Developments Ltd, for development at Grand Union House and 16 Kentish Town Road. The site is currently comprised of mixed commercial uses, predominantly offices.
- 7.2 Located in a key part of Camden Town, next to both the existing and new tube station entrances, currently the site detracts from the town centre with the ground floor frontage dominated by undercroft parking and a loading dock, and an in-hospitable public realm. The building is in need of substantial refurbishment with many of the building elements at the end of their operational life. Whilst other elements of the Grimshaw Campus were Grade II listed in 2019, the site and the adjoining service yard were not considered to be of a commensurate heritage and design significance, although they are within a Conservation Area.
- 7.3 The vacancy of the site provides a unique opportunity to progress a comprehensive development that will regenerate this key part of the town centre. Furthermore, a wider masterplan has been agreed with Sainsbury's, the freeholder, to relocate car parking to basement level and introduce enhancements to the public realm. A need for new local office floorspace has been identified.
- 7.4 Accordingly, the proposed development is for the:
- “Part-demolition, in-fill, re-build and upward extension to provide additional Class E office and commercial floorspace, six residential units (Class C3), new areas of landscaping and public realm.”*
- 7.5 The proposal has been brought forward through extensive consultation with local residents and stakeholders, and pre-application discussions with Camden Council, particularly with regard to the detailed design, protection of local amenity and measures to prevent anti-social behaviour.
- 7.6 The upper floors of Grand Union House will be in employment use whilst at ground level there will be flexible commercial space suitable for a range of town centre uses. Six residential units will be provided at 16 Kentish Town Road and overall, there will be three flexible commercial units. An active environment will be provided through the new areas of public realm, landscaping, and the introduction of transparent building frontages. The proposal is considered to be in accordance with the emerging site allocation, which is for employment-led development, approximately six residential units and public realm enhancements. The design will significantly enhance this part of the town centre, the Conservation Area and the setting of the adjoining listed buildings.
- 7.7 The proposal will be brought forward in the spirit of High-Tech architecture, complementing the rest of the Grimshaw Campus and enlivening the area with views into and through the building. Landscaping and planting permeate the building, and the building elevation will be activated through the inclusion of openable windows and screens. The height, massing and appearance of the building has been rigorously tested in terms of daylight/sunlight, local amenity, townscape and heritage, and will have an appropriate impact enhancing the local area.

Public Benefits Statement

- 7.8 Accordingly, the proposal will deliver the following public benefits:
- a. Regeneration of a site that is considered to detract from the Conservation Area and the wider town centre. The current retail and employment accommodation is of a poor quality and is no longer fit for use.

- b. Provision of new high quality flexible employment floorspace to meet local demand. The accommodation has been designed to accommodate the needs of both large occupiers or a range of small and medium businesses.
- c. Provision of flexible commercial space at ground floor level that will activate this part of Kentish Town Road and support the function of the town centre. This space replaces the inactive and unattractive undercroft car parking and loading dock that currently dominates the street frontage.
- d. Introduction of residential use with six high quality flats that meet standards and respond to the urgent need for new homes in Camden. The tenure of these dwellings will be subject to viability discussions.
- e. High quality architecture and design that will preserve and enhance the significance of surrounding heritage assets, and enhance this key part of the town centre and local townscape character. The High Tech style architecture will complement the listed buildings in the wider Grimshaw campus.
- f. Extensive new landscaping and public realm. The undercroft leading from Kentish Town Road to Sainsburys and Camden Road has been widened, and new planting and hard surfacing introduced. This route will as a result be more attractive for public users and benefit from greater passive surveillance. Views through the ground floor accommodation to the service yard to the rear will enhance linkages and provide further street activation.
- g. The building will be highly sustainable. It will adapt and reuse part of the existing building structure, introduce new planting in the internal green house and roof terraces, utilise sustainable energy technologies and facilitate natural ventilation.
- h. Payment of the Community Infrastructure Levy, which will contribute towards local infrastructure and services. Planning obligations secured through a Section 106 Agreement, which will be determined through discussions on financial viability.

7.9 Therefore, the proposal will deliver significant public benefits and will successfully regenerate this part of the town centre. It is in compliance with planning policy and should be granted planning permission.

APPENDIX A: SITE PLANNING HISTORY

Reference	Location	Description	Decision	Date of Decision
2018/6092/P	Grand Union House 16-20 Kentish Road	Partial demolition and redevelopment of the existing building, to provide a new office (Class B1) building with associated roof terraces, ground floor flexible uses (Class A1 /A3/ D2), and 6 flats (1 x studio, 2 x 1 bed and 3 x 2 bed), along with associated landscaping works.	Withdrawn	6 February 2020
AE9800637	Unit 2	Advertisement consent for the erection of banner to ground floor shopfront. As shown on drawing Nos A, B, C and D.	Grant Approval for Advertisement	15 October 1998
P9601911	Unit 2	Installation of a new shopfront and other minor alterations, as shown on drawing nos. KT101, 102, 103 and 104.	Grant Full Planning Permission	3 September 1996
9300766	Unit 2	Change of use and works of conversion from retail and light industrial accommodation to provide a health club at first floor level and a shop and access at ground floor as shown on drawing nos. 92B4/S01 S02 P01 P02.	Grant Full Planning Permission	26 October 1993
9201296	20 Kentish Town Road	The construction of a 100-seat cinema at ground level with works to include the re- arrangement of the access and parking accommodation as shown on drawings A B and C.	Grant Full Planning Permission	25 March 1993
9200997	Suite 2	Change of use and works of conversion of ground floor retail unit and first floor light industrial unit to a Lazer Games Centre within the meaning of Class D2 of the Town and Country Planning (Use Class) Order 1987 as shown on drawing numbers ABC/09/08 and ABC/W0/10 D.	Refused	27 January 1993
9180096	18 Kentish Town Road	Display of a wall mounted lacquered steel sign measuring 4.1m x 1.75m located 1.1m above ground level and illuminated by an external static floodlight as shown on drawing numbers 1073.19 and 1073.13	Grant Approval for Advertisement	1 October 1991
8701006	ABC Bakery site (fronting 17-21 Camden Road	Amendment of planning permission dated 7th May 1986 (Reg no. 8600151R2) including the addition of an additional three storey house along the Canal frontage the conversion of the end house nearest Kentish Town Road into a bedsit and maisonette the reduction of car parking to provide 300 spaces and external alterations as shown on drawing numbers SK374 ABC SO 02 ABC 21 ABC 001 3A	Grant Full Planning Permission	10 June 1987

Reference	Location	Description	Decision	Date of Decision
		07 SO 13E SO 15A HO 10C W0 10D and as described in your schedule dated 22/4/87of changes to details of approved planning permission and key to cladding notes.		
8601494	ABC Bakery Site	The erection of six structural- support members on the public highway as shown on drawing no. ABC/SO/03/A.	Grant Full or Outline Planning	23 October 1986
8600151	ABC Bakery Site	(Reserved Matters) Redevelopment of the ABC Bakery Site south of the Regents Canal by the erection of buildings comprising:(a) A retail store fronting Camden Road. (b)An industrial/workshop building fronting Kentish Town Road. (c)A residential terrace fronting the Regents.	Approval of Reserved Matters	30 April 1986
8401869	ABC Bakery Site	Redevelopment of the land known as the ABC Bakery site (17-21 Camden Road 131-147 Camden Street Camden Gardens and frontage to Kentish Town Road NW1)by the erection of buildings comprising:- ^1.South Side of the Canal ^(a) a retail store with associated creche.	Grant Full Planning Permission	8 October 1985
8470288	ABC Bakery Site	Demolition of the buildings on the ABC Site as shown on drawing nos. 7340/OPL/4 5 and 6. ^Revised on 14th December 1984.	Conservation Area Consent Approved.	3 April 1985
8500097	ABC Bakery Site	Outline application for: ^(i)North site: - residential and parking ^(ii)South site: refurbishment and redevelopment including partial demolition to provide accommodation for workshop retail office recreation and social uses.	Withdrawn	22 February 1985
8570019	ABC Bakery Site	Listed Building Consent for - South site: partial demolition of rear block A in connection with the outline application: ^ South site: Refurbishment and redevelopment to provide accommodation for workshop retail office recreation and social uses together with car parking spaces ^ North.	Withdrawn	22 February 1985
8470177	ABC Bakery Site	Demolition in a Conservation Area. As shown in drawing titled: Demolition Plan - ABC Site 2.	Refused	12 February 1985
8400943	ABC Bakery Site	Outline application for a mixed development of residential commercial studio workshops and ancillary facilities retaining the existing bakery (Kentish Town Road building) and changing its use in part to commercial and residential.	Refused	6 February 1985

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Reference	Location	Description	Decision	Date of Decision
8470102	Former ABC Bakery Site	Demolition in connection with the redevelopment of the site for retail (Class 1) and residential purposes with associated car parking and access arrangements * (in outline only).	Withdrawn	16 April 1984