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PLANNING STATEMENT

**TYBALDS ESTATE, NEW NORTH STREET,
LONDON, WC1N 3JT**

Date: July 2021

Ref: 12698

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CONTENTS

1.0 EXECUTIVE SUMMARY	1
2.0 INTRODUCTION AND PURPOSE	3
Purpose of this Statement	3
Environmental Statement.....	5
3.0 SITE AND SURROUNDINGS	6
Site Location.....	6
The Application Site	6
Surrounding Area	6
4.0 PLANNING BACKGROUND	7
Relevant Planning History and Existing Lawful Uses	7
Parker House Development.....	9
Pre-Application Consultation	10
5.0 THE PROPOSAL	11
Description of Development.....	11
Proposed Land Use	12
Design.....	15
Access, Parking and Servicing	16
Energy and Sustainability.....	17
Trees and Landscaping / Public Realm.....	18
6.0 PLANNING POLICY CONTEXT	19
The Development Plan.....	19
Other Material Considerations	25
7.0 PLANNING ASSESSMENT	27
Principle of Development	27
Land Uses.....	27
Affordable Housing Provision	28
Affordable Housing Tenure.....	29
Residential Mix.....	29
Residential Quality	30
Design.....	31
Daylight / Sunlight.....	32
Heritage and Archaeology	33
Transport.....	34
Trees, Landscaping & Biodiversity	35
Flood Risk and Drainage.....	36
Air Quality	37
Acoustics	37
Energy and Sustainability.....	38
8.0 REGENERATION STATEMENT.....	40
Community Halls.....	40



Public Realm and Landscaping Improvements 40
 Accessibility..... 40
 Affordable Housing 41
 Job Opportunities 41
 Summary 41

9.0 AFFORDABLE HOUSING STATEMENT42

10.0 PLANNING OBLIGATIONS AND COMMUNITY INFRASTRUCTURE LEVY46

 Planning Obligations 46
 Community Infrastructure Levy 46
 Highways Agreement..... 46

11.0 CONCLUSIONS48

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01	Draft Planning Statement	SS	EP	EP	J.Farr	30.06.21
02	Final					
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1.0 EXECUTIVE SUMMARY

1.1 This Planning Statement has been prepared by DWD Property & Planning ('DWD'), on behalf of the London Borough of Camden ('LB Camden'), in relation to an application for full planning permission for Proposed Development at Tybalds Estate, New North Street, London, WC1N (referred to as the 'Site' hereafter).

1.2 The Proposed Development comprises of:

"Demolition of existing storage sheds and infill development on the existing Tybalds Estate which comprises of the construction of three blocks, two mews terraces, and conversion of the lower ground floor of three existing blocks to provide a total of 56 residential units (Class C3) and community space, alterations to existing residential block entrances, provision of a lift to existing Devonshire Court, refuse facilities, public realm improvements, alterations to parking layout, cycle parking, landscaping and associated works."

1.3 The Proposed Development has been informed by pre-application advice received from the London Borough of Camden ('LB Camden') and delivers several significant benefits, including the following:

- The intensification and regeneration of an existing developed site that maximises its utilisation and provides additional housing in a sustainable location with excellent accessibility and proximity to transport links. The development is deemed compatible within the existing housing estate and the surrounding residential and mixed-use area;
- The introduction of new buildings and extensions that are of high-quality design with a layout, scale and massing that responds sensitively to the existing area, including the surrounding residential environment;
- A car free development (for the new dwellings), a rationalisation of the existing parking across the Estate and provision of significant number of cycle parking spaces which will help to minimise the demand for private vehicular travel and encourage sustainable transport options including public transport;
- Public realm improvement and provision of additional soft landscaping across the Site;
- Improvements to pedestrian legibility and accessibility across the Estate;
- Energy efficiency measures combined with renewable energy sources will be implemented meaning that the total carbon saving against the building regulation target emissions will be a 38.1% reduction over the baseline building emissions; and

- Provision of new and enhanced resident's association halls for community use.

1.4 This Planning Statement and the supporting documentation submitted with this application have demonstrated that the Proposed Development accords with all relevant adopted and emerging local and national policy.

2.0 INTRODUCTION AND PURPOSE

2.1 This Planning Statement has been prepared on behalf of LB Camden in support of a full planning application ('the Application') for the Proposed Development of the Site.

Purpose of this Statement

2.2 The purpose of this statement is to set out the planning rationale that underpins the Proposed Development and to demonstrate its acceptability in planning terms. It assesses the application proposals against the relevant provisions of the statutory development plan and other material planning guidance and considerations.

2.3 This Statement is structured as follows:

- **Section 3: Site and Surroundings:** describes the Site and its surroundings;
- **Section 4: Planning Background:** sets out the relevant planning history of the Site and summarises pre-application consultation undertaken as part of the preparation of the application;
- **Section 5: The Proposed Development:** provides details of the Proposed Development;
- **Section 6: Planning Policy Context:** sets out the national and local planning policy framework against which the application is to be determined;
- **Section 7: Planning Assessment:** assesses the Proposed Development against the relevant planning policy framework and other material considerations;
- **Section 8: Regeneration Statement:** provides a supporting statement outlining the regeneration benefits from the proposed development;
- **Section 9: Affordable Housing Statement:** sets out the number of residential units; the mix of units, and the levels or types of affordability or tenure for different units;
- **Section 10: Planning Obligations and Community Infrastructure Levy:** provides a summary of the planning obligations and Community Infrastructure Levy associated within the Proposed Development;
- **Section 11: Conclusions:** summarises our conclusions in support of the Proposed Development.

2.4 This Planning Statement should be read in conjunction with the following supporting documents that comprise this planning application:

- Application Form and Certificates;
- Council own application form;
- Schedule of notices served;
- Community Infrastructure Levy Form;
- OS Site Location Plan (Scale 1:1000), prepared by Matthew Lloyd Architects;
- Existing Site Plan, prepared by Matthew Lloyd Architects;
- Proposed Plans including Proposed Site Plan and Masterplan, Affordable Housing Plan, Wheelchair Accessible Units Plan, Floorplans, Roof Plan, Elevations and Sections, Proposed Entrance Plans, Bulky Refuse Store Plans, prepared by Matthew Lloyd Architects;
- Whole Scheme Overview Schedule, including Residential Units Area & Tenure Schedule, prepared by Matthew Lloyd Architects;
- Planning Statement, prepared by DWD;
- Design and Access Statement, prepared by Matthew Lloyd Architects;
- Landscape Design and Access Statement, prepared by Matthew Lloyd Architects and Lush Landscapes;
- Flood Risk Assessment and Surface Water Drainage Strategy, prepared by Mason Navarro Pledge;
- Land Quality, Ground Conditions and Contamination File Note, prepared by Harrison Group and including detailed Unexplored Ordnance (UXO) Risk Assessment (with covering note prepared by DWD);
- Transport Statement, prepared by Velocity Transport Planning;
- Draft Delivery and Servicing Plan, prepared by Velocity Transport Planning;
- Waste Management Strategy, prepared by Velocity Transport Planning;
- Health Impact Assessment, prepared by LB of Camden and DWD;
- Statement of Community Involvement, prepared by LB of Camden and DWD;
- Air Quality Assessment, prepared by ACCON UK;
- Air Quality Neutral Assessment, prepared by ACCON UK;

- Noise and Vibration Assessment, prepared by ACCON UK;
- Daylight and Sunlight Report (Within Development), prepared by Right of Light Consulting;
- Daylight and Sunlight Study (Neighbouring Properties), prepared by Right of Light Consulting;
- Heritage Assessment, prepared by The Environmental Dimension Partnership;
- Archaeological Desk Based Assessment, prepared by CgMs Consulting (with covering note prepared by DWD);
- Preliminary Arboricultural Assessment, prepared by Middlemarch Environmental;
- Arboricultural Impact Assessment, prepared by Middlemarch Environmental;
- Arboricultural Method Statement, prepared by Middlemarch Environmental;
- Preliminary Ecological Appraisal, prepared by Middlemarch Environmental;
- Preliminary Bat Roost Assessment, prepared by Middlemarch Environmental;
- Thermal Comfort Report, prepared by TGA Consulting Engineers;
- Energy & Sustainability Statement, prepared by TGA Consulting Engineers;
- Fire Statement, prepared by WSP; and
- Draft Construction Logistics Plan, prepared by Velocity Transport Planning.

Environmental Statement

2.5 The Proposed Development has been reviewed in the context of Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ('the Regulations'). The scheme does not exceed the thresholds applicable to 'Urban development projects' and the Site is not located within a 'sensitive area', as set out in Schedule 2 of the Regulations, therefore the Proposed Development does not necessitate an Environmental Statement.

3.0 SITE AND SURROUNDINGS

3.1 This section describes the Site and its surroundings.

Site Location

3.2 The Site comprises the land outlined in red on the enclosed Site Location Plan, which extends to an area of approximately 1.58 hectares (3.9 acres). The Site is located between Great Ormond Street and Theobalds Road. It is bound by Orde Hall Street and Harpur Street to the east, Old Gloucester Street to the west, Great Ormond Street to the north and Theobalds Road to the south.

The Application Site

3.3 The Site currently comprises of several urban blocks of varied heights, with the two tallest blocks totalling 14 storeys in height (Babington Court and Chancellor's Court). The Site also comprises of car parking, open paved and grassed areas and ancillary facilities, including a residents association hall beneath Blemundsbury.

3.4 Two public and adopted highways, being North Street and Ormond Close, enter the Site and provide the primary vehicular access. Vehicular access to the Site is also gained from Harpur Street and Orde Hall Street. Pedestrian access is gained from Order Hall Street, Boswell Court, New North Street and Ormond Close.

3.5 The Site falls within the Central London Area and is located just outside of the Holborn Growth Area. Parts of the western side of the Site are within the Bloomsbury Conservation Area, although the majority of the Site is not within this designation. There are no Listed Buildings on the Site, although there are a number of Listed Buildings that are proximate to the Site.

3.6 The Site falls within Flood Zone 1 and therefore has a low probability of flooding.

Surrounding Area

3.7 The Site is surrounded by an area of land that is characterised by a mix of residential, commercial / retail uses, and hospital facilities which are located to the north of the Site including the Great Ormond Street Hospital for Children.

3.8 The Public Transport Accessibility Level (PTAL) of the majority of the Tybalds Estate is 6b on a scale of 0 (worst) to 6b (best). The north eastern corner of the Tybalds Estate is located off of Orde Hall Street has a PTAL score of 6a. The closest Underground Station to the Site is Holborn located approximately 450m from the Site. Chancery Lane Underground Station is located approximately 800m from the Site. The Site is also served by a number of bus routes.

4.0 PLANNING BACKGROUND

4.1 This section summarises the planning history associated with the Application Site and summarises its existing lawful uses. Then, a summary is provided of the consultation and pre-application engagement that has taken place.

Relevant Planning History and Existing Lawful Uses

4.2 Having reviewed the Council's online records, the following planning applications identified in the table below are considered relevant to the Site.

Application Ref.	Description of Development	Status
2016/0773/P	Erection of two 3 storey blocks with roof terraces on Orde Hall Street to provide a combined hostel of 21 ensuite bedrooms with communal facilities (Sui Generis) for use by parents/carers of children being treated at Great Ormond Street Hospital (in place of 2 blocks of 9 selfcontained flats granted planning permission dated 13/05/2014 ref 2013/1014/P).	Withdrawn 12/10/2017
2016/6547/P	Amendments to the tenure mix of housing approved by planning permission ref 2013/1014/P granted on 13/05/2014 for mixed use development to provide 93 mixed tenure residential units (Class C3) and associated works.	Approved 21/03/2017
2016/1889/P	Amendments to planning permission dated 13.5.14 ref 2013/1014/P (for Mixed use development to provide 93 mixed tenure residential units, alterations to existing dwellings and entrances, 249 sqm of new/replacement community facilities, etc), namely to allow various minor changes throughout estate to fenestration, facade elevations, cladding, materials, rooflights, entrances, landscape, refuse stores, terraces, etc.	Approved 21/12/2016
2015/3312/P	Variation of condition 2 (development in accordance with approved plans) of planning permission dated 13.5.14 ref 2013/1014/P (for Mixed use development to provide 93 mixed tenure residential units, alterations to existing dwellings and entrances, 249 sqm of new/replacement community facilities, etc), namely to allow relocation of existing electricity substation on Orde Hall Street and associated relocation of three approved mews houses further west to include vacant land next to 2 Barbon Close.	Approved 29/09/2015

2015/3303/P	Amendments to planning permission dated 13.5.14 ref 2013/1014/P (for Mixed use development to provide 93 mixed tenure residential units, alterations to existing dwellings and entrances, 249 sqm of new/replacement community facilities, etc), namely to allow- (a) omission of 'pop-up' roof access hatches and associated roof terraces and balustrades to the new Blemundsburly terraced houses; (b) changes to the internal layouts of some private flats in the 2 book-end blocks facing Orde Hall St; (c) omission of refuse chute from Devonshire Court new stair core.	Approved 22/10/2015
2013/1014/P	Mixed use development to provide 93 mixed tenure residential units (Class C3), alterations to existing dwellings and entrances, 249 sqm of new/replacement community facilities (Class D1) an energy centre, refuse, cycle and caretakers facilities and associated landscape and public realm improvement works. The provision of a new internal access road and the reorganisation of car parking within the site and the surrounding area.	Approved 13/05/2014
PSX0105489	New security entrance to block, new gates and railings and associated landscaping wall, as shown on drawing numbers: TE/98/P, TE/99/P, TE/101/P-105/ P, 110/P-112/P, 115/P-117/P, 120/P, 125/P, 130A/P, 131A/P, 5 sheets of photos.	Approved 27/06/2002
N15/1X/17/10/53	The erection on the Tybalds Close site, Holborn, as an extension to Falcon House, of a seven-storey block containing fourteen flats, as shown on the drawing submitted	Approved 17/10/1953
N15/1X/12/03/53	The erection on the site of Tybalds Close, Holborn, as an extension to Falcon House, of a seven-storey block containing fourteen flats as shown on the layout plan and detailed drawings submitted.	Approved 09/05/1953

4.3 As identified above, planning permission ref. 2013/1014/P was approved in May 2014 for mixed use development at the Tybalds Estate Site, including the provision of 93 residential units. This permission was subject to a number of amendments and numerous applications were made to discharge conditions on the permission, however, this permission was not implemented and has since expired. This planning permission was not progressed for a number of reasons, with a key reason being that the high costs associated with delivering the scheme meant that it was not viable.

- 4.4 A further planning application was submitted in 2016 (ref. 2016/0773/P) which proposed the replacement of 2 blocks of 9 self-contained flats on Orde Hall Street, known as the bookends, with two 3 storey blocks to provide a combined hostel of 21 ensuite bedrooms with communal facilities for use by parents/carers of children being treated at Great Ormond Street Hospital (GOSH). A resolution to grant planning permission for this scheme was made at planning committee on the 21st June 2016, subject to the completion of a legal agreement. The legal agreement was not completed and this application has since been withdrawn.

Parker House Development

- 4.5 The delivery of housing at Tybalds Estate is tied to a shadow s106 agreement that relates to the development of another Council led development at Parker House, 25 Parker Street London, WC2B 5AN. The Parker House development was consented in August 2013 for

“Redevelopment of the site to provide 43 residential units (40 x private and 3 x affordable) within a six storey plus basement building and retention of the existing façade to Parker Street, following demolition of the existing hostel accommodation and former Aldwych Workshops on Parker Mews and associated storage, cycle parking, refuse and landscape works (Class C3)” (ref. 2012/6132/P).

- 4.6 The Parker House shadow s106 requires the delivery of off site affordable housing and identifies that this should be delivered at Tybalds Estate and that “the total area of the units to comprise not less than 2,913 square metres of gross internal area” and “shall provide for at least 60 per cent (60%) net internal area of the floorspace thereof to be Social Rented Housing”.

- 4.7 The agreement states that in the event that the accommodation cannot be delivered at Tybalds Estate, then at least the same quantum of affordable floorspace should be delivered on an alternative site but that the units should be “located within the Holborn and Covent Garden Ward of the London Borough of Camden”.

- 4.8 Whilst the shadow S106 refers to 2,913 sqm of floorspace, looking back to the Parker House Committee Report this confirms that the actual off-site affordable requirement associated with the Parker House development was 2,890 sqm based on the 'GIA' of the individual units and therefore excluding communal areas (stairs/ lifts etc). The key Parker House affordable benchmark requirement is therefore 2,890 sqm 'GIA' excluding circulation space.

- 4.9 It is understood that the view from LBC at that time the Parker House development was consented, was that the development opportunities at Tybalds Estate were better suited towards the provision of affordable housing units. As well as providing affordable housing for the Parker House site, the

original development proposals at Tybalds Estate (planning permission ref. 2013/1014/P) proposed to deliver policy compliant affordable housing. The original Tybalds Estate scheme proposed 23 affordable units which contributed towards the delivery of on site Tybalds Estate housing, 27 private units and a further 43 affordable units to meet the Parker House s106 requirement. This resulted in a total of 66 affordable units and 27 private units.

Pre-Application Consultation

[Pre-Application Consultation with London Borough of Camden](#)

- 4.10 The Applicant has undertaken and engaged in extensive pre-application discussions with LB Camden officers prior to the submission of this planning application. This has included taking the scheme to two Design Review Panels. Further details of this engagement are included in the submitted Statement of Community Involvement.

[Pre-Application Consultation with the Community](#)

- 4.11 There has also been extensive engagement with residents of the Tybalds Estate and the surrounding area. Further details of this engagement are included in the submitted Statement of Community Involvement.

5.0 THE PROPOSAL

- 5.1 The purpose of this section is to describe the Proposed Development for which planning permission is sought.

Description of Development

- 5.2 This Application seeks full planning permission for the following description of development:
- “Demolition of existing storage sheds and infill development on the existing Tybalds Estate which comprises of the construction of three blocks, two mews terraces, and conversion of the lower ground floor of three existing blocks to provide a total of 56 residential units (Class C3) and community space, alterations to existing residential block entrances, provision of a lift to existing Devonshire Block, refuse facilities, public realm improvements, alterations to parking layout, cycle parking, landscaping and associated works.”*
- 5.3 The planning permission ref. 2013/1014/P for development at Tybalds Estate, referenced above in Section 4, has now expired and was not progressed for a number of reasons, including that the high costs associated with delivering the scheme meant that it was not viable. This scheme established the principle of additional development across the Estate.
- 5.4 In 2017, Camden explored progressing a revised scheme at the Estate and considered the feasibility of securing planning permission for a reduced scheme that proposed a smaller proportion of the accommodation than had previously been proposed. The reduced scheme intended to keep the footprints and massing for the elements they intended to progress, the same as the original consent.
- 5.5 It was subsequently decided by LB of Camden that rather than progressing a reduced scheme based on the original consent, that a revised scheme would be more appropriate which draws on elements of the original consent and also introduces a fresh design approach. A new project architect was therefore appointed, Matthew Lloyd Architects, to reconsider the scheme, including footprint and massing of the buildings and how the public space could be enhanced. This application is the culmination of over 3 years work and design development. It seeks to deliver significant improvements to the Estate and high quality and well considered housing. The scheme is discussed in further detail in the Planning Assessment section.
- 5.6 This section should be read in conjunction with the submitted plans, Design and Access Statement, and other supporting technical documents which accompany this application.

Proposed Land Use

5.7 The proposed land uses are discussed in further detail below.

Residential Use

5.8 A total of 56 residential units (Use Class C3) are proposed providing 4,079sqm (43,906sqft) net of residential floorspace (area excludes common parts). The residential development will comprise of the following:

- The construction of three new blocks (Block B, Block C, & Block D) of five, four and seven stories, respectively, providing 36 residential units;
- The construction of two new mews terraces (Eastern Mews & Western Mews) of two stories with a three-storey bookend, providing 10 residential units; and,
- The conversion of the lower ground floor of three existing blocks (Blemundsbury, Falcon & Richbell) as underbuilds accommodation, providing 10 residential units.

5.9 The proposals also include the provision of new entrances and refuse stores on the north-eastern elevations of the existing blocks, Babington Court and Chancellors Court. A new lift shaft is also proposed on the southern elevation of the existing Devonshire Court and the provision of a stand-alone communal bulky refuse store to the west of proposed Block C to cater for the additional residential provision.

Residential Mix

5.10 A mix of residential unit sizes are proposed: 24 x 1 bed / 2 person units; 11 x 2 bed / 3 person units; 9 x 2 bed / 4 person units; 1 x 3 bed / 4 person units; 9 x 3 bed / 5 person units; 1 x 4 bed / 6 person units; and 1 x 4 bed / 7 person units.

5.11 The proposal provides a tenure split comprising 23 social rent units, 5 intermediate rent units and 28 market sale units. Both the proposed Eastern and Western Mews along with the proposed Blemundsbury East Block B will provide private tenure, with all other buildings providing affordable tenure.

Residential Quality

5.12 Where possible, the proposed residential units have been designed to ensure compliance with the standards set out in the London Plan and Mayor of London's Housing Supplementary Planning Guidance. This includes (but not limited to):

- The nationally described dwelling space standards set out in the Department for Communities and Local Government (DCLG) Technical housing standards 2015;
- 10% of units will meet Building Regulation requirement M4 (3) 'wheelchair user dwellings';
- The units have been designed to meet the Lifetime Homes and Secured by Design standards;
- Minimising single aspect north facing units;
- Minimum private outdoor amenity space standards;
- Privacy levels for habitable rooms in relation to neighbouring residential units.

Owing to existing constraints, the proposed underbuilds are unable to meet certain requirements such as the minimum ceiling heights. Further detail is outlined in the accompanying Design and Access Statement.

Affordable Housing

- 5.13 The proposed development will provide 28 affordable tenure units, which will be located in the underbuilds (10 units), Block D (12 units) and Block C (6 units). The table below further breaks down the affordable units by tenure and unit size:

Unit Size	Social Rent No. Units	Intermediate Rent No. Units
1 Bed	5	5
2 Bed	12	0
3 & 4 Bed	6	0
Total	23	5

- 5.14 The affordable floorspace will equate to 50.5% of the overall residential Gross Internal Floor Area. It will equate to 50% of the scheme by unit numbers and 51% by habitable rooms.

- 5.15 The scheme provides the maximum viable quantum of affordable housing. This is confirmed in the submitted Assessment of Viability. Further details of the affordable provision are also set out in the Affordable Housing Statement provided later in this report.

Development Phasing

- 5.16 The scheme will be delivered in phases, to ensure that it is viable. The scheme will be phased as follows:

- Phase 1:
 - Underbuild units (10 x Social Rent units)

- Western Mews (5 x private tenure)
- Eastern Mews (5 x private tenure)
- D Block (7 x social rent and 5 x intermediate rent)
- Conversion works to provide Falcon residents association hall
- Part of landscaping and public realm works, including ramp access to underbuilds.
- Ramp access to Babington Court and Chancellors Court and introduction of a lift to serve Devonshire Court.
- Rationalisation to parking layout.

Total Units: 32 units (22 affordable and 10 private tenure units)

- Phase 2:

- Block C (6 x social rent units) plus residents association hall
- Block B (18 private tenure units)
- Further landscaping and public realm works

Total Units: 24 units (6 social rent units and 18 private tenure units)

5.17 Further details of the development phasing and construction programme are set out in the Construction Logistics Plan prepared by Velocity Transport Planning.

Community Floorspace

5.18 At the ground floor of the proposed Block C, a residents' association hall will be provided. This space will provide two separate halls, together with ancillary kitchen facilities, storage space and WCs.

5.19 Existing and currently under used stores at the lower ground floor level of Falcon block will be converted to provide a further residents association space. This space will provide a single hall with ancillary kitchen, storage space and WC facilities and accommodate up to 60 people.

5.20 Both spaces will be available to hire for use by members of the Estate. It is expected that they will be run and managed by the Tybalds Residents Association.

5.21 The table below details the proposed community floorspace:

Location	Area sqm NIA	Area sqm GIA
Block C	118.5	163
Falcon Underbuilds	88	130

5.22 In addition to the above, the existing mess room at lower ground floor level of Springwater will be upgraded to a caretaker's room and office, with ancillary WC facilities.

Design

5.23 As set out within the Design and Access Statement, the Proposed Development is the result of a design-led approach that is a response to the characteristics of the local context, including the surrounding built environment.

Layout, Scale and Massing

5.24 The proposed residential development will be spread across the Site, with the majority of the new builds (Western Mews, Eastern Mews, Block B & Block C) located towards the northern part of the Site. The proposed Blemundsburys underbuilds are also located in this area of the Site. Proposed Block D is located towards the southern part of the Site and so too are the Falcon and Richbell underbuild conversions.

5.25 The proposed buildings are all a continuation of the existing blocks' perimeter. The Mews buildings create a new pedestrian street by filling in the gaps to the south of the estate in a rhythmical pattern. Blocks B and C form a new courtyard with the existing Blemundsburys block, and the setback storeys of Block B allow it to respond also to the houses to the East on Orde Hall Street. Similarly, Block D follows the existing streetscape and approach in its adjacency to Richbell.

5.26 As mentioned earlier, the proposed buildings will range between two and seven stories. Block B will be a 5 storey building, comprising of one and two-bed units with recessed balconies. The East facade will step back for the upper two storeys, allowing it to respond to its different neighbours.

5.27 Framing a new landscaped courtyard to Blemundsburys, Block C will be situated on the West corner of Blemundsburys. Its north elevation presents a symmetrical pavillion-like building, facing parallel to the new Tybalds Square and the building reaches a height of four stories.

5.28 The Eastern Mews will comprise predominantly of 2-storey Market Sale houses with roof terraces facing on to the South side of the estate. Together with Block B, the Eastern Mews form bookends to the main entrance of the estate from Orde Hall Street. Therefore, the end house to the west will be 3-storeys high to be in line with Block B's first three storeys before it sets back.

5.29 The Western Mews will also comprise of predominantly 2-storey houses with roof terraces facing on to the South side of the estate.

5.30 Block D will be a 7-storey apartment building, stacked vertically, apart from the top floor where the building is recessed inwards to provide suitable separation to Richbell.

External Appearance

- 5.31 The proposed buildings will offer a contemporary design with finishes that seek to respond to the surrounding environment.
- 5.32 Blocks B and C will be clad predominantly in multi-tone red brick, with white glazed brick horizontal banding. The entrances to these blocks will be emphasised through the use of alternating red and glazed white brick pattern.
- 5.33 The Eastern and Western Mews, along with Block D will be clad primarily of light buff bricks. Block D will also include white glazed brick horizontal banding, and dark grey brick will be introduced around the entrance to the block similarly to the other blocks. The Mews will have recessed entrances surrounded in white glazed bricks to illuminate the entrance point.
- 5.34 Minimal external changes are proposed to the underbuilds, with the existing cladding to remain. However, additional aluminium windows are proposed and new entrance doors will be provided. The proposed entrances and refuse stores to the existing Babington Court and Chancellors Court Blocks will be clad in a light buff brick.
- 5.35 The 38.5sqm standalone refuse store will consist of a metal store with timber cladding and a green roof.

Access, Parking and Servicing

Vehicle and Pedestrian Access

- 5.36 The existing vehicle, pedestrian and cycle access points into the Tybalds Estate Site will all be retained as part of the proposals. An alternative route through the Site between King's Cross and Holborn is proposed. A formal square on the route at the centre of the estate will link back into the surrounding road network and it is also proposed to redefine the east-west route through the site as a pedestrian route but with limited vehicular access. As explained in the submitted Design and Access Statement, the public realm works and positioning of the buildings seek to create clear primary routes through the Estate, to create legibility.
- 5.37 Pedestrian access points into the proposed residential buildings will provide step free access, and the proposed new entrances into the existing Babington Court and Chancellors Court will also provide for step free access. The provision of a lift in the existing Devonshire Court will allow for improved access across the entire block.

Car and Cycle Parking Provision

- 5.38 The proposed development does not provide any additional car parking provision with the exception of Blue Badge Parking. As part of the proposals, there will be rationalisation / reprovision of existing on-site spaces across the Estate which are heavily underutilised. In total, 53 parking spaces are proposed to be removed across the Estate to reduce car movements to and from the Site and to encourage sustainable modes of transport.
- 5.39 Two Blue Badge parking spaces will be provided as part of the proposal which will be provided in association with the proposed disabled accessible units in Falcon and Blemundsbury. As such it is proposed to convert one existing parking bay at Falcon to a disabled bay, and one existing on-street Camden CPZ bay to a disabled bay at the southeast corner of the site on Orde Hall Street. The location of both bays will be accessible within 50m of the respective building entrance points.
- 5.40 A total of 104 long stay cycle parking spaces and three short stay cycle parking spaces are proposed in association with the proposed 56 residential units, in accordance with London Plan minimum cycle parking standards.
- 5.41 Further details on car and cycle parking, including the proposed vehicle parking reprovision strategy, are provided in the accompanying Transport Statement.

Refuse Collection

- 5.42 A detailed Waste Management Plan prepared by Velocity Transport Consultants details the position of the refuse stores for each of the blocks and confirms the access routes and collection arrangements for refuse vehicles to these.

Energy and Sustainability

- 5.43 An Energy Statement and Sustainability Statement accompanies this application which outlines that the proposed buildings have been designed to be energy efficient.
- 5.44 The proposed energy efficiency measures include: improvements to the building fabric, installation of a DHW system using air source heat pumps, energy efficient lighting and fans, and installation of photovoltaics.
- 5.45 The combination of energy efficiency measures and renewable energy will provide a carbon saving of 38.1% in comparison to the Target Emission Rate regulated emissions.
- 5.46 Full details of the energy measures proposed for the Application Site can be found within the Energy Assessment and Sustainability Statement.

Trees and Landscaping / Public Realm

Tree Works

- 5.47 A tree survey of the Site and its immediate surrounding has been undertaken and accompanies this application. The Tree Survey has identified 67 individual trees and 1 group of trees located across the survey area. It is confirmed in the Tree Survey that no trees will require removal and one tree (T18) will require pruning as part of the Proposed Development.

Landscaping Strategy and Public Realm Works

- 5.48 Tree planting and soft landscaping are proposed across the Site in association with the proposed development. In total, approximately 51 trees will be planted across the Site, generally focussed towards the areas of proposed development. New structural shrub planting will be provided within the public realm and boundary hedging will be provided to the Eastern and Western Mews.
- 5.49 Island beds of herbaceous planting and ornamental grasses are proposed bordering the central events space and rain gardens of compacted gravel and low planting are proposed across the site.
- 5.50 Improvements are also proposed to the existing public realm through the introduction of a new direct north-south route across the square to improve permeability and connectivity.
- 5.51 Please refer to the accompanying Landscape Design and Access Statement for further details.

6.0 PLANNING POLICY CONTEXT

6.1 This section sets out the planning policy framework, including other material considerations against which this planning application should be determined.

The Development Plan

6.2 In line with Section 38(6) of the Planning and Compulsory Purchase Act (2004) planning applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise. Accordingly, National Planning Policies, as set out in the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG), and local Development Plans are the starting point for the assessment of a development.

6.3 The NPPF sets out the presumption in favour of sustainable development. It requires planning applications to be approved without delay where they accord with an up-to-date development plan.

Adopted Development Plan Policy

6.4 The adopted Development Plan relevant to the Site currently comprises the following documents:

- The London Plan (2021)
- Camden Local Plan (2017)
- Camden Planning Guidance (CPG) documents, including:
 - Access for All CPG (March 2019)
 - Air Quality CPG (January 2021)
 - Amenity CPG (January 2021)
 - Design CPG (January 2021)
 - Energy efficiency and adaptation CPG (January 2021)
 - Housing CPG (January 2021)
 - Planning for health and wellbeing CPG (January 2021)
 - Transport CPG (January 2021)

6.5 Together, these documents provide spatial policies, development management policies and site allocations to guide and manage development in Camden.

6.6 The London Plan identifies the Site to be located within the Central Activities Zone.

6.7 The Site is covered by the following designations in Camden's adopted Proposals Map:

- Central London Area;
- Archaeological Priority Area;
- Designated View – Properties in the north east corner of the Estate fall within the Primrose Hill summit to St Paul's Cathedral Designated View (Right Lateral Assessment Area, +58m AOD) (orange dashed line). The Estate also falls within the Greenwich Park Wolfe statue to Tower Bridge Designated View (Right Lateral Assessment Area, +53m AOD) (yellow dashed line).
- Bloomsbury Conservation Area – the buildings on the west side of the Estate fall within The Bloomsbury Conservation Area this includes Boswell Court, Boswell House and Devonshire Court.

Site / Area Specific Policies

6.8 The Site is located on the adopted Proposals Map within the **Central Activities Zone, Central London Area, Bloomsbury Conservation Area, and Archaeological Priority Area**, where the following policies apply.

Central Activities Zone / Central London Area

6.9 London Plan Policy SD4 (The Central Activities Zone (CAZ)) outlines that the unique international, national and London-wide roles of the CAZ, based on an agglomeration and rich mix of strategic functions and local uses, should be promoted and enhanced. The distinct environment and heritage of the CAZ should be sustained and enhanced and the attractiveness and inclusiveness of the CAZ to residents, visitors and businesses should be enhanced, including through public realm improvements and the reduction of traffic dominance. The quality and character of predominantly residential neighbourhoods, where more local uses predominate, should be conserved and enhanced.

Bloomsbury Conservation Area

6.10 London Plan Policy DC1 (Heritage conservation and growth) states that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. 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.

- 6.11 Local Plan Policy D2 (Heritage) states that the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas. 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; resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area; resist development outside of a conservation area that causes harm to the character or appearance of that conservation area; and preserve trees and garden spaces which contribute to the character and appearance of a conservation area or which provide a setting for Camden's architectural heritage.

Archaeological Priority Area

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

Other Key Development Plan Policies

- 6.13 The following general development management policies that are of particular relevance to this application are as follows:

- Principle of Development: London Plan Policy GG2 (Making the best use of land) states that in order to create successful sustainable mixed-use places that make the best use of land, there should be focus on the potential to intensify the use of land to support additional homes and workspaces, and promote higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.

Local Plan Policy G1 (Delivery and location of growth) outlines that the Council will deliver growth by securing high quality development and promoting the most efficient use of land and buildings by, amongst other measures, supporting development that makes best use of its site. Growth in Camden will be expected to help contribute towards achieving the

provision of 16,800 homes. The policy confirms that the most significant growth will take place in growth areas, highly accessible locations including Central London and the Council's Community Investment Programme (CIP). The Site is both within Central London and is CIP site.

- Residential Use: London Plan Policy H1 (Increasing housing supply) outlines the ten-year targets for net housing completions that each local planning authority should plan for. To achieve these targets, Borough's should (amongst other measures) optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions.

Local Plan Policy H1 (Maximising housing supply) outlines that the Council will aim to secure a sufficient supply of homes to meet the needs of existing and future households by maximising the supply of housing and exceeding a target of 16,800 additional homes from 2016/17 - 2030/31. This will be achieved through measures including regarding self-contained housing as the priority land-use of the Local Plan, and where sites are underused or vacant, expecting the maximum reasonable provision of housing that is compatible with any other uses needed on the site.

- Residential Mix: London Plan Policy H10 (Housing size mix) sets out that schemes should generally consist of a range of unit sizes and the appropriate mix of unit sizes should have regard to matters such as local evidence and the range of tenures in the scheme.

Local Plan Policy H6 (Housing choice and mix) states that the Council will aim to minimise social polarisation and create mixed, inclusive and sustainable communities by seeking high quality accessible homes and by seeking a variety of housing. High quality accessible homes will be sought and, amongst other matters, the Council will encourage design of all housing to provide functional, adaptable and accessible spaces; and, expect all self-contained homes to meet the nationally described space standard.

Local Plan Policy H7 (Large and small homes) states that the Council will aim 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. The Council will seek to ensure that all housing development contributes to meeting the priorities set out in the Dwelling Size Priorities Table and includes a mix of large and small homes.

- Affordable Housing Provision: London Plan H4 (Delivering affordable housing) sets out measures to achieve the strategic target of 50 per cent of all new homes delivered across London to be genuinely affordable. This policy also outlines that affordable housing should be provided on site and should only be provided off-site or as a cash in lieu contribution in exceptional circumstances. London Plan Policy H6 (Affordable housing tenure) sets out the split of affordable products should be applied to residential development.

Local Plan Policy H4 (Maximising the supply of affordable housing) states that the Council will aim to maximise the supply of affordable housing and exceed a borough wide strategic target of 5,300 additional affordable homes from 2016/17 - 2030/31. An affordable housing target of 50% applies to developments with capacity for 25 or more additional dwellings.

- Residential Quality: London Plan Policy D6 (Housing quality and standards) sets out that housing development should be of high quality design and should meet certain criteria with respect to matters such as daylight / sunlight, private internal space and private outside space.
- Design & Amenity: London Plan Policy D4 (Delivering good design) sets out that the design quality of development should be retained through to completion, and that Design and access statements submitted with development proposals should demonstrate that the proposal meets the design requirements of the London Plan.

Local Plan Policy D1 (Design) states that the Council will seek to secure high quality design in development. Amongst other matters, design will be required to respect local context and character, be sustainable in design and construction, comprise details and materials that are of high quality and complement the local character, integrate well with the surrounding streets and open spaces, preserve strategic and local views, and incorporate high quality landscape design.

Local Plan Policy A1 (Managing the impact of development) sets out that the Council will seek to protect the quality of life of occupiers and neighbours and will grant permission for development unless this causes unacceptable harm to amenity.

- Air Quality: Local Plan Policy CC4 (Air Quality) sets out that the Council will ensure that the impact of development on air quality is mitigated and ensure that exposure to poor air quality is reduced in the borough.

- Drainage and Flooding: Local Plan Policy CC3 (Water and flooding) seeks to ensure that development does not increase flood risk and reduces the risk of flooding where possible. Development will be required to address a series of requirements such as utilising Sustainable Drainage Systems (SuDS).
- Transport and Parking Provision: London Plan Policy T6 (Car parking) states that car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity, and that car-free development should be the starting point for all development proposals.

London Plan Policy T5 (Cycling) states that development proposals should help remove barriers to cycling, including securing the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located. The cycle parking standards are outlined in Table 10.2 of the London Plan.

Local Plan Policy T1 (Prioritising walking, cycling and public transport) outlines that the Council will promote sustainable transport by prioritising walking, cycling and public transport in the borough.

Local Plan Policy T2 (Parking and car-free development) states that the Council will limit the availability of parking and require all new developments in the borough to be car-free, with on-site parking limited to spaces designated for disabled people and / or essential operational or servicing needs. The redevelopment of existing car parks for alternative uses will be supported.

Local Plan Policy C6 (Access for all) seeks to promote fair access and remove the barriers that prevent everyone from accessing facilities and opportunities, including expect spaces, routes and facilities between buildings to be designed to be fully accessible, and secure car parking to be provided for disabled people.

- Landscaping: Local Plan Policy A3 (Biodiversity) outlines that the Council will protect, and seek to secure additional trees and vegetation, including expecting developments to incorporate additional trees and vegetation wherever possible.
- Energy / Sustainability: Local Plan Policy CC1 (Climate change mitigation) promotes zero carbon development and requires all development to reduce carbon dioxide emissions through following the steps in the energy hierarchy.

Local Plan Policy CC2 (Adapting to climate change) states that the Council will require development to be resilient to climate change and that all development should adopt appropriate climate change adaptation measures. Any development involving more than 5 residential units is required to provide a Sustainability Statement demonstrating the adoption of appropriate climate change adaptation measures. New build residential development will be encouraged to use the Home Quality Mark and Passivhaus design standards.

Other Material Considerations

National Planning Policy Framework

- 6.14 The National Planning Policy Framework (NPPF) (2019) promotes a strong pro-growth agenda and paragraph 10 states that “*at the heart of the Framework is a presumption in favour of sustainable development*”, which should be seen as a golden thread running through both plan-making and decision taking. For decision-taking, this means (amongst other things) approving development proposals that accord with the development plan without delay (paragraph 11).

Principle of Development

- 6.15 Paragraph 117 states that planning decisions should promote an effective use of land in meeting the need for homes or other uses, while safeguarding and improving the environment.
- 6.16 Paragraph 122 states that planning policies and decisions should support development that makes efficient use of land, taking into account the identified need for different types of development, and the availability of land suitable for accommodating it.

Housing Provision

- 6.17 With respect to strategic policies, Paragraph 20 of the NPPF states that strategic policies should set out an overall strategy for the pattern, scale and quality of development and make sufficient provision for housing (including affordable housing).
- 6.18 Paragraph 59 of the NPPF emphasise the Government’s objective of significantly boosting the supply of homes and the need for a sufficient amount and variety of land to come forward to support this.

Design and Townscape

- 6.19 Paragraph 124 attaches great importance to the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key

aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

6.20 Paragraph 127 states that planning decisions should ensure that developments:

- a) 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;*
- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
- d) 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;*
- e) 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*
- f) 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.*

Sustainable Transport

6.21 Paragraph 103 states that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health.

7.0 PLANNING ASSESSMENT

7.1 This section analyses the proposed development and explains how, in the context of Section 38 (6) of the Planning and Compulsory Purchase Act 2004, the proposals accord with the statutory development plan and other material considerations.

Principle of Development

7.2 The proposed development seeks to provide for the regeneration of part of the existing developed Site and provide for the most efficient use of land which accords with the Council's growth strategy as set out in Local Plan Policy G1.

7.3 The proposal will provide increased intensification of the Site, providing higher density residential development in a location which is serviced by excellent public transport links. This is supported by London Plan Policy GG2 and in the context of evidence of London-wide housing need, we consider there to be a planning case to justify the principle of development.

Land Uses

Residential Use

7.4 The Site in its current form is occupied by a residential development with associated uses. The proposal will introduce additional residential use onto the Site, which is supported at all levels of policy, including London Plan Policy H1 and Local Plan Policy H1.

7.5 The provision of 56 residential units will assist with meeting the relevant housing targets identified in both the London Plan and Camden's Local Plan, helping to secure a sufficient supply of homes to meet the needs of existing and future households.

Community Use

7.6 The Tybalds Residents Association (TRA) already benefit from a community space, beneath Blemundsbury. This will be removed as a result of the proposed development and replaced with initially a TRA hall in converted space under Falcon and then a brand new and purpose build community hall at ground level of the proposed Block C. This new community hall will provide modern space, with good levels of natural light and connectivity to Tybalds Square. The space will be able to be used flexibly to support different community groups needs. There will therefore be a net uplift in the quantum and quality of community floorspace.

Affordable Housing Provision

- 7.7 The proposed development has sought to maximise the delivery of affordable housing on the Site. Extensive discussions on viability have taken place, with various scenarios considered in order to identify the optimum affordable housing solution.
- 7.8 Build costs associated with the delivery of housing on this Site are comparatively high, as a result of contamination below ground and the complexities of infill development within an existing and occupied residential Estate. The construction costs are also high as a result of the extensive community benefits the scheme will ring forward, beyond the housing itself. This includes:
- Landscaping and public realm improvement works across the Estate, in particular within Tybalds Square;
 - Provision of lift access to the existing Devonshire block;
 - Provision of ramped and level access to existing blocks across the Estate to improve accessibility;
 - Provision of two modern community halls, including one new build hall, to provide far superior community spaces that can be more flexibly used, than the existing community hall.
- 7.9 Opportunities to secure Grant Funding have also been explored by LB of Camden. There is also money ringfenced from the Parker House shadow S106 to support the delivery of affordable housing on the Estate.
- 7.10 The previously consented scheme on the Site proposed the delivery of the Parker House affordable requirement in full plus 50% affordable housing. This scheme was however unviable and was not progressed by LB of Camden.
- 7.11 Over the past 3 years the project team has explored the delivery of a fully affordable scheme to meet the Parker House requirement in full or in part, but this was not viable to pursue. Extensive discussions took place with GOSH on the disposal of 1 or two plots of land for parent accommodation (Sui Generis) use. The revenue from the sale of this land would have been reinvested into the delivery of affordable housing. Discussions with GOSH however ceased, with GOSH deciding in late 2020 not to pursue the possible land acquisitions. Non residential uses were also considered but it was considered not to be the optimum solution to hand over residential land to non residential uses. This option also would have conflicted with policy.

7.12 It has therefore been concluded that LB of Camden require revenue from the delivery of private housing or a non C3 use on the Estate, to support the delivery of the Parker House affordable housing. The proposed development therefore includes private housing.

7.13 Once the scheme introduces private housing, this triggers the requirements of policy of Local Plan policy H4 when sets an affordable housing target of 50% and applies to developments with capacity for 25 or more additional dwellings.

7.14 The scheme therefore delivers either:

- 1,964 sqm of the 2,890 sqm Parker House shadow S106 requirement, which equates to 68% and nil policy affordable; or
- None of the required Parker House affordable housing and a scheme that complies with the requirements of policy H4, and delivers 50% affordable floorspace in terms of GIA.

7.15 The scheme can only contribute to/ meet one of the above scenarios, not both.

7.16 However, as explained above there are extensive further community benefits that are being delivered as part of this scheme and which must be taken into consideration when considering that as a result of viability, and the construction costs associated with the development, it is not feasible to deliver any further affordable housing on the Estate.

7.17 The scheme's viability is further discussed in the submitted Assessment of Economic Viability.

Affordable Housing Tenure

7.18 The proposed development will provide:

- Social Rent (London Affordable Rent): 6 x units in Block C, 7 x units in Block D and 10 underbuilds.
- Intermediate Rent: 5 x 1 Bed units in Block D

7.19 The scheme therefore provides a mix of intermediate and social tenure products as required by policy. Discussions have taken place with Housing officers on the tenure and mix of affordable units. Further information on the affordable housing is included in the Affordable Housing Statement Section below.

Residential Mix

7.20 The proposed residential mix offers a range of unit sizes from one-bedroom units to four-bedroom units. Both London Plan Policy H10 and Local Plan Policy H7 set out that schemes should generally

consist of a range of unit sizes which the proposal has sought to achieve with the units proposed providing accommodation options for between two and seven persons.

7.21 Local Plan Policy H7 states that the Council will seek to ensure that all housing development contributes to meeting the priorities set out in the Dwelling Size Priorities Table. With respect to social-affordable rented units, the Dwelling Size Priorities Table identifies the highest priority for two-and-three-bedroom units. The proposal will meet this identified priority with the largest number of social-affordable rented units provided as 2-bedroom units. With respect to intermediate affordable units, a high priority has been identified for one-bedroom units which the proposal focuses on through the provision of five one-bedroom intermediate affordable units.

7.22 The mix of units is reflective of demand for specific dwelling types in the area, and given the units offer a range of household sizes, would provide a mixed and balanced community.

7.23 For the reasons outlined above, the proposed residential mix is considered to comply with London Plan Policy H10 and Local Plan Policy H7.

Residential Quality

7.24 Where possible, the proposed residential units have been designed to ensure compliance with the standards set out in the London Plan and Mayor of London's Housing Supplementary Planning Guidance. This includes (but not limited to):

- The nationally described dwelling space standards set out in the Department for Communities and Local Government (DCLG) Technical housing standards 2015;
- 10% of units will meet Building Regulation requirement M4 (3) 'wheelchair user dwellings';
- The units have been designed to meet the Lifetime Homes and Secured by Design standards;
- Minimising single aspect north facing units;
- Minimum private outdoor amenity space standards;
- Privacy levels for habitable rooms in relation to neighbouring residential units.

Private / Communal Amenity Space

Each residential unit will benefit from access to a private balcony, terrace or garden that meets the London Plan Housing SPG amenity space requirements. Furthermore, residents will benefit from access to the communal landscaped areas, which will include Tybalds Square, areas for sitting, areas for play and growing opportunities.

Design

7.25 This application is accompanied by a Design and Access Statement (DAS) which sets out the design rationale for the Proposed Development, and should be read in conjunction with this section.

Layout, Scale and Massing

7.26 The DAS summarises the existing townscape context within which the Application Site is located and provides an analysis from which the design principles for each of the proposed buildings have evolved.

7.27 The proposal is the result of a design-led approach that responds to the unique characteristics of the local spatial context, including the surrounding townscape (building density/height, block structure, urban grain, building grain, building typology and public realm), and daylight/sunlight admission and accessibility considerations.

7.28 This approach responds positively to policy requirements and also ensures there will be no adverse effect on the amenity of the adjacent residential properties.

7.29 The layout of the proposed scheme efficiently utilises the existing Site, without compromising the provision of amenity space. The layout and siting of the proposed buildings has also sought to enhance the environment on site, with Block C positioned to frame a new landscaped courtyard to the Blemundsbury building, and the Mews positioned to create a new fully pedestrianised street.

7.30 The scale and massing of the proposed buildings has sought to respond to the massing of the neighbouring buildings which varies between 3-4 stories to 10+ stories. Setbacks and recessed entrances have also been used to create unique, sculpted designs in the surrounding complex context.

7.31 Overall, it is considered that the massing, layout and scale of the proposed buildings are sympathetic to the surrounding built context and appropriate within the context of local townscape character.

7.32 For these reasons, the proposed layout, scale and massing of the Proposed Development is considered to accord with London Plan Policy D4 and Local Plan Policy D1.

Architecture

7.33 The elevational treatment of the proposed buildings has been chosen to tie into the existing wider Site which consists of primarily red brick and buff bricks.

- 7.34 The use of red brick on Blocks B and C has been chosen given their close proximity to Blemundsbury which is clad in a similar material / colour, and there is the intention to have these three blocks appear as one unit. The use of white glazed brick horizontal banding allow for effective contrasting and will assist with simulating the concrete slabs that wrap around facades of the existing buildings. Furthermore, to elongate the buildings against the much taller Blemundsbury, the proposed windows have been combined with recessed brickwork panels underneath.
- 7.35 The use of light buff bricks on the proposed Eastern and Western Mews, Block D and new Tower entrances has been chosen to soften their impact on the tight individual sites. The use of recessed light grey buff brickwork panels beneath the proposed windows will assist with tying these buildings together aesthetically.
- 7.36 Together, the proposed buildings are considered to visually stitch together the character and materiality of the existing surrounding buildings whilst also delivering a significant improvement to the urban environment. The elevational treatment and appearance of these buildings offer complementary approaches to provide variety and interest in townscape views.
- 7.37 For these reasons, the architecture of the Proposed Development is considered to accord with London Plan Policy D4 and Local Plan Policy D1.

Public Realm

- 7.38 The Proposed Development involves significant improvements to the public realm which ensure that the existing and proposed development are linked in an effective way that will unify the Estate. The area of public realm will be improved with the creation of new pedestrian routes to improve permeability and connectivity and provide an enhanced experience for pedestrians.

Daylight / Sunlight

- 7.39 The application is supported by two Daylight / Sunlight Assessments, one assessing impacts within the development, and the other assessing impacts on neighbouring properties.
- 7.40 The Daylight / Sunlight Assessment for within the development has sought to assess whether the proposed accommodation will provide its future occupiers with adequate levels of natural light. The Assessment notes that the proposed development design achieves a high level of compliance with the BRE recommendations. A number of rooms do not meet the recommendations; however, this is not considered unusual for an urban location, and the overshadowing test confirms that all residents will have access to well sunlit amenity spaces. The Assessment confirms that the design

will provide future occupiers with adequate levels of natural light in accordance with London Plan Policy D6.

7.41 The Daylight / Sunlight Assessment for neighbouring properties has sought to assess daylight / sunlight impacts on a number of identified neighbours. The Assessment has found that the vast majority of the main habitable room windows and amenity areas tested meet or surpass the BRE numerical recommendations. Some windows and gardens do not meet the recommendations; however, this is not considered unusual in the context of an urban location. Furthermore, the BRE guide explains that the numerical guidelines should be interpreted flexibly, since natural lighting is only one of many factors in site layout design. It is also noted that the extant planning permission (2013/10140/P) approved a scheme with similar daylight / sunlight impacts.

Heritage and Archaeology

7.42 The Site lies within an Archaeological Priority Area and the buildings on the western side of the Estate fall within the Bloomsbury Conservation Area, including Boswell Court, Boswell House and Devonshire Court. A Heritage Assessment has been prepared to accompany this application. The Archaeological Desk Based Assessment prepared to accompany the 2014 planning permission has been resubmitted with this application.

7.43 The Heritage Assessment, prepared by EDP, has considered the potential effects upon the significance of heritage assets within the Site's zone of influence. A large number of heritage assets have been identified within the surroundings, however, only one conservation area and seven listed buildings were considered for detailed assessment. EDP considered that the proposed development could potentially have an impact upon the identified listed building as a result of changes to their setting.

7.44 Of the heritage assets identified, the Heritage Assessment outlines that all were identified as potentially receiving an effect from the proposals as various elements of the proposals would either change or introduce built form within their settings. Despite this, the Heritage Assessment concludes that there would be no adverse effects on a number of the identified heritage assets and in some cases the proposals may lead to a slight enhancement due to the reintroduction of the former mews properties on the northern part of the Site. The mews properties would better reflect the historic grain and former built form within this area, reinforcing the historic context of the Great Ormond Street listed buildings.

7.45 As such, the Heritage Assessment concludes that the proposals cause 'no harm' in terms of NPPF and reflect the provisions of Local Plan Policy D2.

- 7.46 The Archaeological Desk Based Assessment that accompanies this application identifies that the Site has been extensively developed since the late 18th century. The Site was subject to severe bomb damage during World War II and with buildings to the south and west of the Site largely damaged beyond repair. Past destruction of any archaeological evidence within the site is considered severe as a result of multiple phases of development, including extensive development in the 18th century and subsequent redevelopment in the 20th century.
- 7.47 The Archaeological Assessment concludes that the proposed development is unlikely to have any significant archaeological impact due to the limited potential for archaeological remains. The Assessment confirms that no further archaeological mitigation measures will be required in this particular instance.

Transport

Trip Generation

- 7.48 The Transport Statement submitted alongside this planning application concludes that the given the proposed car-free nature of the Proposed Development, it is not expected to generate additional vehicle trips in the weekday AM or PM peak hours. The Proposed Development seeks to reduce the existing quantum of parking across the Estate, to reduce existing vehicle movements to and from the Site and to further encourage sustainable travel. As such, the proposals will have a negligible impact on the existing highway network as it does not facilitate travel to site by car.

Site Access and Accessibility

- 7.49 The existing vehicle, pedestrian and cycle access points into the Tybalds Estate Site will all be retained as part of the proposals. An alternative route between King's Cross and Holborn through the Site is proposed. The proposed works are seeking to provide clear primary routes through the Estate, to create legibility.
- 7.50 The proposed pedestrian access points into the proposed residential buildings will provide step free access, and the proposed new entrances into the existing Babington Court and Chancellors Court Blocks will also provide for step free access. The provision of a lift in the existing Devonshire Block will allow for improved accessibility across the entire block. The proposed changes to pedestrian access will provide a significant improvement compared to the existing situation with it recognised that currently, the majority of Tybalds Estate is not accessible or not easily accessible to those with limited mobility.
- 7.51 As such, the proposed development will accord with Local Plan Policy C6 by promoting fair access and removing the barriers that prevent everyone from accessing facilities and opportunities.

Car and Cycle Parking

- 7.52 London Plan Policy T6 and Local Plan Policy T2 states car-free development will be expected across all new developments in the borough and as such the proposed development will be of a car-free nature (with the exception of Blue Badge Parking).
- 7.53 Rationalisation / re-provision of existing on-site spaces are proposed across the Estate which are heavily underutilised. In total, 53 parking spaces are proposed to be removed across the Estate to reduce car movements to and from the Site and to encourage sustainable modes of transport.
- 7.54 The proposals will result in a net reduction of three on-site Camden CPZ parking spaces which has been discussed with LBC Highways during pre-application discussions. This is considered suitable given that relevant assessment showed demand did not exceed eight parked vehicles out of 13 Camden CPZ parking spaces.
- 7.55 Two Blue Badge parking spaces will be provided as part of the proposal and will be accessible given their location within 50m of the respective building entrance points.
- 7.56 A total of 104 long stay cycle parking spaces and three short stay cycle parking spaces are proposed in association with the proposed 56 residential units, in accordance with London Plan minimum cycle parking standards.

Trees, Landscaping & Biodiversity

- 7.57 Local Plan Policy A3 outlines that the Council will protect, and seek to secure additional trees and vegetation, including expecting developments to incorporate additional trees and vegetation wherever possible.
- 7.58 The Tree Survey undertaken as part of this application identified 67 individual trees and 1 group of trees located across the survey area. It is confirmed in the Tree Survey that no trees will require removal and one tree (T18) will require pruning as part of the Proposed Development. The development will introduce circa 51 trees to the Site.
- 7.59 Substantial areas of new soft landscaping are also proposed including structural shrub planting, boundary hedging the Mews buildings, island beds of herbaceous planting and ornamental grasses, and rain gardens.
- 7.60 The combination of protecting existing trees and providing for additional trees and vegetation on-site, ensures the Proposed Development will accord with Local Plan Policy A3.

- 7.61 A Preliminary Ecological Appraisal (PEA) has been prepared to accompany this application. The PEA confirms that the Site is dominated by buildings and hardstanding with small areas of amenity grassland, introduced shrub and scattered trees. The landscape beyond this is dominated by further residential buildings, roads and recreational park space and gardens.
- 7.62 The PEA anticipates that the proposed development will not have an adverse impact on surrounding nature conservation sites, including the SSSI Impact Risk Zone for Hampstead Heath Wood SSSI which the Site is located within.
- 7.63 The PEA provides a number of recommendations with respect to matters including habitat retention and protection, biodiversity enhancement, roosting bats, nesting birds, and invasive plants.
- 7.64 A Preliminary Bat Roost Assessment (PBR) has also been prepared to accompany this application. The PBR has identified that the storage buildings and sheds, which require removal to facilitate the re-development, are unsuitable to support roosting bats. As such, no further works are required in respect of roosting bats.
- 7.65 Further details of the layout of the trees, hard and soft landscaping can be found in the accompanying Landscape Design and Access Statement, and the PEA.

Flood Risk and Drainage

- 7.66 As set out above, the Site is located within Flood Zone 1. The application is accompanied by a Flood Risk Assessment and Drainage Strategy which confirms that the Environment Agency published flood risk from surface water map shows that there is a predominately very low flood risk from surface water across the site. The proposed residential use has a 'more vulnerable' classification in accordance with the NPPF which is deemed 'appropriate' in Flood Zone 1.
- 7.67 It is recognised that the proposed re-development primarily consists of only a number of new buildings across a wider site with a number of other existing buildings. As such, it is recognised that it would be impractical for the proposed re-development to restrict surface water discharge from the entire site, considering the significant amount of works that would be required to existing drainage infrastructure.
- 7.68 The proposed re-development will result in a decrease of 289sqm of hard landscaping which is a 2% decrease in hard paved areas. Where possible, improvements to the surface water run off are proposed, including the incorporation of green / blue roofs to all new buildings that will restrict discharge at a restricted rate, and the provision of permeable paving in new parking areas.

7.69 The proposed drainage infrastructure will be designed to accommodate all storm events up to and including the 1 in 100 year storm event plus the allowance for climate change, in accordance with Camden's SuDS requirements.

Air Quality

7.70 The Air Quality Assessment submitted as part of this application provides an assessment of the air quality impacts from both the construction and operation phases.

7.71 With respect to the construction phase, the overall effects of dust nuisance are expected to be temporary, short term, and with appropriate dust mitigation, the impacts should be low to negligible.

7.72 With respect to the operational phase, the Proposed Development is expected to generate only a very small increase in vehicle movements and therefore there will be no measurable increases in pollutant concentration levels at existing sensitive receptors within the AQMA. Furthermore, modelling has confirmed that there will be no exceedances of the nitrogen dioxide or particulate matter objectives at the sensitive development receptors on the Site, and as such mitigation is not required.

7.73 An Air Quality Neutral Assessment has also been prepared to support this application. With respect to transport emissions, given that no additional car parking spaces are proposed, there will be no transport related emissions from the development and accordingly mitigation will not be required. As there are no pollution emitting energy sources on Site, building emissions have not been calculated for the development, as they are effectively zero.

Acoustics

7.74 The application is accompanied by a Noise and Vibration Assessment which assesses both the impact of noise and vibration from the Proposed Development on the surrounding environment, as well as assessing existing noise and vibration impacts on the Proposed Development.

7.75 It is acknowledged that construction of the Proposed Development is expected to cause some disturbance to noise sensitive receptors within and around the Tybalds Estate. The disruption will generally be localised and be temporary and relatively short-term in nature. The Noise and Vibration Assessment identifies a number of noise and construction mitigation measures to ensure impacts are minimised. It is recommended that these measures are implemented through a Construction Environmental Management Plan (CEMP) which would be prepared prior to commencement of the development.

- 7.76 Plant rooms are proposed at the ground floor of the new residential blocks and a plant area on the roof of Block C. Air source heat pumps are also proposed for the new residential units and a detailed noise assessment of these will be required when details of the items have been finalised. The Noise and Vibration Assessment has provided a number of recommendations in the design of the plant room to ensure noise levels are below the LOAEL. With respect to the use of the proposed community hall spaces, a series of noise mitigation measures have been identified for consideration where they are applicable to the proposed uses. If necessary, further information on acoustic separation between the residential and the proposed community hall uses, and noise levels within the community space, can be provided and this can be secured by planning condition.
- 7.77 With respect to internal noise levels of the Proposed Development, the Assessment predicts that for all habitable rooms, the internal noise level will be below the LOAEL or between the LOAEL and SOAEL. Therefore, no specific acoustic mitigation measures have been identified for the majority of the development. With respect to external noise levels and the proposed private balconies overlooking Orde Hall Road or Boswell Road, the external noise levels are predicted to exceed the SOAEL by up to 5dB. This is considered appropriate and not uncommon in an urban environment. Furthermore, these residents will have access to ground level external areas, which will ensure all residents have access to areas which have been predicted to experience a noise level below the LOAEL or between the LOAEL and SOAEL. This is considered appropriate and not uncommon in an urban environment.
- 7.78 With respect to vibration effects within the Proposed Development, the vibration levels at the lower ground level of the Falcon building are below the residential vibration criteria specified by Camden Council. The Falcon building is the closest part of the development to the London Underground Piccadilly Line, and are therefore expected to be higher than the rest of the Site. No vibration mitigation measures are therefore required for the Proposed Development.
- 7.79 The Noise and Vibration Assessment concludes that there should be no objection to granting planning permission for the proposed development on noise and vibration grounds.

Energy and Sustainability

- 7.80 Local Plan Policy CC1 promotes zero carbon development and requires all development to reduce carbon dioxide emissions through following the steps in the energy hierarchy.
- 7.81 An Energy Statement and Sustainability Statement, as required by Local Plan Policy CC2 has been prepared to accompany this application. The Proposed Development includes the implementation of a number of energy efficient measures and the development will be provided within

approximately 105sqm photovoltaic panels, which when combined will provide a CO2 reduction of 38.1% emissions reduction over the Baseline building emissions.

7.82 To offset the shortfall in carbon emissions, as per the GLA Carbon Emission Reporting Spreadsheet, a cash in-lieu contribution of £139,133 will also be made.

8.0 REGENERATION STATEMENT

8.1 The regeneration of Tybalds Estate is being progressed by LBC as one of the Council's Community Investment Programme projects (CIP). This section provides details of the regeneration benefits from the proposed development.

Community Halls

8.2 Currently there is a community hall at lower ground floor space at Blemundsby Block. There is also a further hall at the lower ground floor of the existing Falcon Block. These serve existing residents. The quality of the accommodation is dated and in need of improvement, to improve residents access to community spaces.

8.3 The existing Blemundsby TRA hall will be removed in Phase 1 of the Proposed Development.

8.4 As part of the first phase of the Proposed Development, the existing Falcon TRA will be refurbished. This will provide residents with access to better quality community space, that can be used more flexibly and provides a better environment for residents than the existing space.

8.5 In Phase 2, the proposed new build Block C will provide a purpose built and new community space for residents. It will provide two halls plus ancillary facilities such as storage, WCs and a small kitchen. The space will look out on to the new Tybalds Square, enabling the inside and outside community spaces to be used either concurrently together by the same users, or by different users. The position of the community hall will provide natural surveillance across the Estate.

Public Realm and Landscaping Improvements

8.6 The positioning of the proposed blocks, together with the public realm and landscaping works, seeks to knit together the Estate so that it reads as a more coherent whole. Clear pathways through the Estate will be provided, so that pedestrian routes are clear. The extent / location of car access will be controlled to further enhance the amenity use of the landscaped areas and the pedestrian environment.

8.7 The introduction of a well-considered landscaping scheme across the Estate aims to enable it to be better utilised by residents, this includes residents of all ages, including children. Further details of the regeneration benefits of the landscaping scheme are set out in the submitted Landscape Design and Access Statement.

Accessibility

8.8 Currently there is non-level and stepped access to parts of the Estate. This makes it difficult for disabled residents and visitors to navigate.

- 8.9 The scheme seeks to address this, and ensure that the Estate is inclusive and accessible for all.
- 8.10 Ramp accesses will be provided to existing blocks, that currently have stepped accesses. A new lift shaft to serve Devonshire Block will also be installed, to improve level access to this block. Level and ramp access will also be provided to all new build blocks and new residential units.
- 8.11 The accessibility improvements provide regeneration benefits for both existing and new residents.

Affordable Housing

- 8.12 The development will provide new affordable homes, that will be integrated into the Estate. The new homes will be to support housing needs in Camden.
- 8.13 28 affordable homes are proposed to be delivered, these will be mixed tenure, to ensure that they can meet different affordability needs of Camden's residents.

Job Opportunities

- 8.14 Whilst the end phase development will not provide job opportunities, as the development is for residential housing, there will be job opportunities during the construction phase.
- 8.15 The construction phase of the development will provide a wide range of on-site job opportunities, for employees with a range of skill sets. It is expected that the Contractor will also promote apprenticeship and training opportunities to local people, to enable them to join the workforce.

Summary

- 8.16 Overall, it is considered that the Proposed Development will have a positive overall regeneration impact on the Tybalds Estate, for existing and future residents.
- 8.17 Furthermore, separate to the development that is the subject of this planning application, LBC is also investing into Tybalds Estate as part of the Better Homes Programme. As part of this programme there will be improvements to the existing buildings, the landscape and security, as well as a more sustainable and cost efficient heating system.

9.0 AFFORDABLE HOUSING STATEMENT

9.1 This section summarises the affordable housing provision, that the Proposed Development will deliver.

9.2 The table below provides a full schedule of the affordable units:

Block	Flat No.	Floor Level	No. of Bedrooms	No. of Habitable Rooms	Size (sqm)	Wheelchair Unit?	Tenure
Block C	C.1.1	First	2	3	71	No	London Affordable Rent
Block C	C.1.2	First	3	5	89	No	London Affordable Rent
Block C	C.2.1	Second	2	3	71	No	London Affordable Rent
Block C	C.2.2	Second	3	5	89	No	London Affordable Rent
Block C	C.3.1	Third	2	3	71	No	London Affordable Rent
Block C	C.3.2	Third	3	5	89	No	London Affordable Rent
Block D	D.1.1	First	2	3	68.5	No	London Affordable Rent
Block D	D.1.2	First	1	2	52	No	Intermediate Rent
Block D	D.2.1	Second	2	3	68.5	No	London Affordable Rent
Block D	D.2.2	Second	1	2	52	No	Intermediate Rent
Block D	D.3.1	Third	2	3	68.5	No	London Affordable Rent
Block D	D.3.2	Third	1	2	52	No	Intermediate Rent
Block D	D.4.1	Fourth	2	3	68.5	No	London Affordable Rent

Block D	D.4.2	Fourth	1	2	52	No	Intermediate Rent
Block D	D.5.1	Fifth	2	3	68.5	No	London Affordable Rent
Block D	D.5.2	Fifth	1	2	52	No	Intermediate Rent
Block D	D.6.1	Sixth	1	2	61	No	London Affordable Rent
Block D	D.6.2	Sixth	1	2	52	No	London Affordable Rent
Blemundsbury Underbuild	UB.0.1	Underbuild	2	3	70	No	London Affordable Rent
Blemundsbury Underbuild	UB.0.2	Underbuild	2	3	71	Yes	London Affordable Rent
Blemundsbury Underbuild	UB.0.3	Underbuild	2	3	71	Yes	London Affordable Rent
Blemundsbury Underbuild	UB.0.4	Underbuild	2	3	70.5	Yes	London Affordable Rent
Blemundsbury Underbuild	UB.0.5	Underbuild	1	2	62.5	Yes	London Affordable Rent
Falcon Underbuild	UF.0.1	Underbuild	1	2	58	No	London Affordable Rent
Falcon Underbuild	UF.0.2	Underbuild	1	2	59	Yes	London Affordable Rent
Falcon Underbuild	UF.0.3	Underbuild	4	6	120	Yes	London Affordable Rent
Richbell Underbuild	UR.0.1	Underbuild	3	5	92	No	London Affordable Rent
Richbell Underbuild	UR.0.2	Underbuild	3	5	94.5	No	London Affordable Rent

9.3 The total Gross Internal Area (GIA) of the affordable units will be 2,511.5 sqm, comprising of 50.20% of the scheme.

9.4 The affordable units will be split between 2,098.5 sqm (83.56%) London Affordable Rent (social tenure) and 413 sqm GIA (16.44 %) Intermediate rent (Intermediate tenure).

9.5 The affordable accommodation comprises 50% of the scheme by units (28 of 56) and 51.18% (87 of 170) by habitable room.

9.6 Further details of the assumed rental levels of the affordable products are set out in LSH's Indicative Market Valuation of the Completed Development Report (July 2021) which is submitted with the planning application. Their report makes the following assumptions on the affordable tenure products:

- London Affordable Rent: The London Affordable Rented product was created by the Greater London Authority (GLA) and was designed in response to the national Affordable Rent (intermediate product) introduced by the government. Nationally Affordable Rent home cannot be let at more than 80% of market rents, inclusive of service charges. The Mayor does not consider 80% of market rents to be genuinely affordable in most parts of London and therefore the London Affordable Rent is substantially below this level. The GLA set a benchmark rent in 2017/18 dependent on the bedroom size which applies across London and is exclusive of service charge. As set out in 2016-2021 Affordable Homes Programme Funding Guidance, the GLA updates its London Affordable Rent Weekly Rent benchmarks on an annual basis. Current rents for 2021/ 22 are: 1 beds £161.71 per week; 2 beds £171.20 per week, 3 bed £180.72 per week and 4 beds £190.23 per week. All weekly rents quoted exclude service charges.
- Intermediate Rent: LSH has had reference to the Camden Planning Guidance Housing (SPG) published in January 2021 when considering the expected rental levels. As set out within the guidance note the London Borough of Camden has not adopted the Mayor of London, London Living Rent model (intermediate rented product) for housing in Camden due to the high rental values in the borough and the priority the Council places on lower income groups. The CPG defined intermediate rent within the borough as:

“The Council's Intermediate Housing Strategy sets out our priority groups, target household incomes and affordability calculation for intermediate housing. The Council considers housing to be affordable where housing costs (including rent and service charges) take up no more than 40% of net household income (with net income assumed to be 70% of gross income). The strategy seeks to ensure that the majority of intermediate housing in each scheme is

affordable to households with gross annual incomes between £30,000 and £40,000, based on 2016 earnings. The Intermediate Housing Strategy also provides for this priority income range to be adjusted by wage inflation. The priority income range as adjusted to 2019 earnings is £31,950 to £42,600.”

- 9.7 LBC has sought to maximise the delivery of affordable housing and also to maximise the quantum of social tenure units, including social tenure family homes. Six of the 23 social tenure units will be 3 or 4 bed units and a further 4 will be 2 bed 4 person units.

10.0 PLANNING OBLIGATIONS AND COMMUNITY INFRASTRUCTURE LEVY

Planning Obligations

- 10.1 Under Section 106 of the Town and Country Planning Act 1990, as amended, local planning authorities have the power to enter into planning obligations with any person interested in land in their area for the purpose of restricting or regulating the development or use of land.
- 10.2 In accordance with Regulation 122 of the CIL Regulations, and paragraph 56 of the NPPF, a planning obligation should only be sought where they meet all of the following tests:
- Necessary to make the Proposed Development acceptable in planning terms;
 - Directly related to the Proposed Development; and
 - Fairly and reasonably related in scale and kind to the Proposed Development.
- 10.3 Paragraph 54 of the NPPF supports that planning obligations should only be used where it is not possible to address unacceptable impacts through a condition. These obligations are typically secured via a legal agreement, a S106 agreement. As LBC is the applicant and also the local planning authority, it will be a shadow S106 agreement that will be entered into.
- 10.4 It has been calculated by the energy consultant that a Carbon Emissions in lieu payment carbon contribution is likely to be sought, totalling of £139,133. Please see the supporting submitted Energy & Sustainability Statement, prepared by TGA Consulting Engineers. It is proposed that if the planning authority seek this contribution, that the money is ringfenced to be re-invested into future energy improvements and sustainability initiatives on the Tybalds Estate.
- 10.5 It is expected that the scheme will trigger a highways contribution. A figure for this has not been discussed for the current scheme with the highways team.

Community Infrastructure Levy

- 10.6 CIL relief is expected for the affordable element of the scheme. Mayoral and Camden CIL will be chargeable on the remainder of the scheme. A CIL Additional Information Form has been submitted with the planning application.

Highways Agreement

- 10.7 A small area of land at Ormond Close (approximately 83.8 sqm) is currently held by the Council under its powers/functions as a Housing Authority. A small area of land at Barbon Close (approximately 82.4 sqm) is highways land held by the Council pursuant to its function as a

Highways Authority. To help facilitate the development, a land swap is proposed of these two small areas of land. This is being dealt with by LBC separate to this planning application.

11.0 CONCLUSIONS

11.1 The Proposed Development comprises the erection of three blocks, two mews blocks, and conversion of the lower ground floor of three existing blocks to provide a total of 56 residential units (Class C3), alterations to existing residential block entrances, provision of a lift shaft to existing Devonshire Block, refuse facilities, public realm improvements, alterations to parking layout, cycle parking, landscaping and associated works.

11.2 The Proposed Development has evolved and been informed by pre-application discussions with LBC. It is considered to provide a high-quality design that is of an appropriate scale, layout and massing, and external appearance.

The Proposed Development delivers a number of significant benefits, including the following:

- The intensification and regeneration of an existing developed site that maximises its utilisation and provides additional housing in a sustainable location with excellent accessibility and proximity to transport links. The development is deemed compatible within the existing housing estate and the surrounding residential and mixed-use area;
- The introduction of new buildings and extensions that are of high-quality design with a layout, scale and massing that responds sensitively to the existing area, including the surrounding residential environment;
- A car free development and provision of significant cycle parking spaces which will help to minimise the demand for private vehicular travel and encourage sustainable transport options including public transport;
- Provision of additional soft landscaping across the Site, enhancements to the Site's biodiversity value and Public realm improvements.
- Improvements to pedestrian connectivity across and through the Estate so that the Estate is more legible.
- Energy efficiency measures combined with renewable energy sources will be implemented meaning that the total carbon saving against the building regulation target emissions will be a 38.1% reduction over the baseline building emissions.

This Planning Statement and the supporting documentation submitted with this application have demonstrated that the Proposed Development accords with all relevant local, regional and national policy. Therefore, it is considered that the presumption in favour of sustainable development applies

and the application should be approved without delay, in accordance with paragraph 10 in the NPPF.