

Address:	The Charlie Ratchford Centre Belmont Street London NW1 8HF		3
Application Number	2020/5063/P	Officer: Ben Farrant	
Ward:	Haverstock		
Date Received:	02/11/2020		

Proposal: Redevelopment of site including demolition of existing buildings and erection of a building up to 10 storeys in height for to provide self-contained residential flats (Use Class C3) and associated works.

Background Papers, Supporting Documents and Drawing Numbers:

Existing Drawings:

CHA-HTA-A-0001 A, CHA-HTA-A-0010 B, CHA-HTA-A-0011 A.

Proposed Drawings:

CHA-HTA-A-0100 I, CHA-HTA-A-0101 H,
CHA-HTA-A-0102 H, CHA-HTA-A-0103 H, CHA-HTA-A-0104 H, CHA-HTA-A-0105 H,
CHA-HTA-A-0106 H, CHA-HTA-A-0107 H, CHA-HTA-A-0108 H, CHA-HTA-A-0109 H,
CHA-HTA-A-0110 F, CHA-HTA-A-0111 E, CHA-HTA-A-0200, CHA-HTA-A-0201,
CHA-HTA-A-0202 A, CHA-HTA-A-0251 B, CHA-HTA-A-0252 B, CHA-HTA-A-0253 A,
CHA-HTA-A-0301, CHA-HTA-A-0302, CHA-HTA-A-0303, CHA-HTA-A-0304, CHA-HTA-A-0305,
CHA-HTA-A-0306, CHA-HTA-A-0307, CHA-HTA-A-0308, CHA-HTA-A-0309,
CHA-HTA-A-0310, CHA-HTA-A-0311, CHA-HTA-A-0312, CHA-HTA-A-0313,
CHA-HTA-A-0314, CHA-HTA-A-0315, CHA-HTA-A-0316, CHA-HTA-A-0317,
CHA-HTA-A-0318, CHA-HTA-A-0319, CHA-HTA-L-0905 A.

Supporting Documents:

Covering letter (Iceni) 29 October 2020, Air Quality Assessment Rev 02 (Stantec) February 2021, Arboricultural Impact Assessment (Vistry) October 2020, Preliminary Ecology Assessment (Vistry) October 2020, Contaminated Land Assessment (Vistry) October 2020, Internal Daylight, Sunlight & Overshadowing Assessments (Vistry) October 2020, Daylight and Sunlight Assessment Impacts on Neighbouring Properties (Vistry) October 2020, Energy Statement (Vistry) October 2020, Flood Risk Assessment and Drainage Report (Vistry) final v2 08/03/2021, Health Impact Assessment (Vistry) October 2020, Heritage, Townscape & Visual Assessment (Vistry) October 2020, Noise Impact Assessment (Vistry) October 2020, Planning Statement (Vistry) October 2020, Statement of Community Involvement (Vistry) October 2020, Sustainability Statement (Vistry) October 2020, Transport Assessment including a Travel Plan Rev E (Vistry) October 2020, Site Waste Management Plan (Vistry) October 2020, Construction/Demolition Management Plan Rev 0.1, Belmont Street Affordable Housing Proposal (hta) 13.05.20,
Outline Fire Strategy CL5956/R1 Issue 1 (JGA) 30/04/2020, Design & Access Statement CHA-HTA-A-0700 (Vistry) October 2020, Accommodation Schedule (hta) 10.09.20.

RECOMMENDATION SUMMARY: Grant Conditional Planning Permission Subject to Section 106 Legal Agreement

Applicant:	Agent:
Vistry Partnerships	Iceni Projects Da Vinci House 44 Saffron Hill London EC1N 8FH

ANALYSIS INFORMATION

Land Use Details:			
	Use Class	Description	Floorspace (GIA sq. m)
Existing	F2(b) (former D2)	Community centre	1,185
	Total	-	1,185
Proposed	C3	Residential	9,226
	Total	-	9,226

Parking Details:		
	Parking Spaces (General)	Parking Spaces (Disabled)
Existing	6	2
Proposed	0	3 (on-street)

OFFICERS' REPORT**Reason for Referral to Committee**

Residential development involving the construction of a building with more than 10 new residential dwellings [clause 3(i)].

EXECUTIVE SUMMARY

The site is located close to the Chalk Farm Underground Station, and sits between two road frontages: Belmont Street on the east side and Crogsland Road on the west. It houses a single storey block, the Charlie Ratchford Resource Centre (CRRC), a day care centre built in the early 1970s. It is not within or near to a conservation area, though locally listed buildings exist on Belmont Street and Crogsland Road, with the Grade II* listed Roundhouse and Grade II listed Chalk Farm Station both located on the nearby Chalk Farm Road to the south.

The site is owned by Camden Council and forms part of a Community Investment Programme (CIP) scheme. Galliford Try (now Vistry) Partnerships has signed a development agreement with Camden Council to replace the current building with a new extra-care facility and day centre on Crogsland Road opposite the site, which has

been constructed and was handed over to the Council on 24/11/2020. The agreement involves the linked redevelopment of the current CRRC site.

Planning permission is sought for the demolition of the existing CRRC building, and provision of a part 5, part 7, and part 10 storey building around the perimeter of the site. The building would contain 115 residential flats, comprising 89 market flats (36 x studios, 29 x 1 beds, and 24 x 2 beds), and 26 affordable flats (11 x 1 beds, 12 x 2 beds, and 3 x 3 beds). The centre of the site would form a communal garden area for residents in addition to the provision of private amenity space for each flat.

The CRRC site is linked to the adjacent site on Crogsland Road which has just been redeveloped to provide a new extra-care centre and is anticipated for occupancy in April 2021. This site provided an affordable housing credit of 3,568sqm which it was envisaged would be taken into account (a material consideration) when considering redevelopment of the CRRC site. The total floorspace created across the two sites (if this scheme were to be approved) would be 11,429.6sqm, and so an additional 2,146.8sqm of affordable housing floorspace has been provided on the CRRC site in order to achieve 50% affordable housing across the two sites (representing a total of 26 affordable flats on the CRRC site, as well as the provision of the extra-care centre on Crogsland Road). As such, the proposal provides 50% affordable housing across the two sites, in compliance with policy. Full details are contained within the 'Housing Mix, Unit Size, and Affordable Housing' section of this report.

The proposed affordable housing mix has been need-led and developed in conjunction with the Council's Housing Commissioning and Partnerships Team; however, the private mix is weighted towards smaller units. Officers consider this, on balance, acceptable based on the primary objective of achieving policy compliant affordable housing across the two sites and the fact that a range of two bed units suitable for families are included in the mix.

It is noted that there are a number of objections from nearby occupiers, including concerns expressed about loss of residential amenity. The application proposes development on a site that currently has a low level building which affords an unusual standard of daylight and sunlight to surrounding flats. There would be adverse light impacts in to a number of buildings. The report assesses each impact in detail below explaining mitigating factors and weighs this impact against strategic objectives of optimising development on the site. On balance, whilst there would be impact, this considered to be within an acceptable range.

The proposed development has been carefully considered by officers and it is concluded that the proposal complies with development plan in the following ways:

- Good Growth - the proposals seek to make best use of an underutilised, brownfield site in a town centre location with excellent public transport links.
- New Homes - delivery of 115 new homes to help meet local need and deliver Camden's ambitious housing targets.
- Affordable Homes - provision of 26 affordable homes equating to 50% affordable homes in total when combined with the 38 extra care homes now constructed on Crogsland Road.

- Inclusive Design - 12 wheelchair user homes (10% of total homes) with the remaining homes designed to be accessible and adaptable dwellings.
- Quality Homes – a high quality living environment for future residents with private amenity space for every home; communal landscaped courtyard with playspace and enhanced landscaping around the site.
- Distinctive Design - the use of high quality materials and detailing which acknowledges the surrounding and historic context.
- Green Development - sustainable design which embraces urban greening, energy efficiency and passive design measures to limit its energy demands and CO2 emissions.
- Public Realm Improvements – including street tree planting and footpath improvement works to the north of the site.
- Secure and Safe Place - an outward looking development, which would promote and enhance safety and security.
- A package of contributions, including £113,000 towards Pedestrian, Cycling, Environmental and Public Realm Improvements, £642,870 as a Public Open Space contribution, and approximately £2,845,758 in Community Infrastructure Levy (CIL) payments.

Paragraph 10 of the NPPF states that there is a presumption in favour of sustainable development, which should be a golden thread running through decision making. The dimensions of sustainable development are economic, social and environmental which should be sought jointly. The proposed development would result in benefits through all 3 strands of sustainable development.

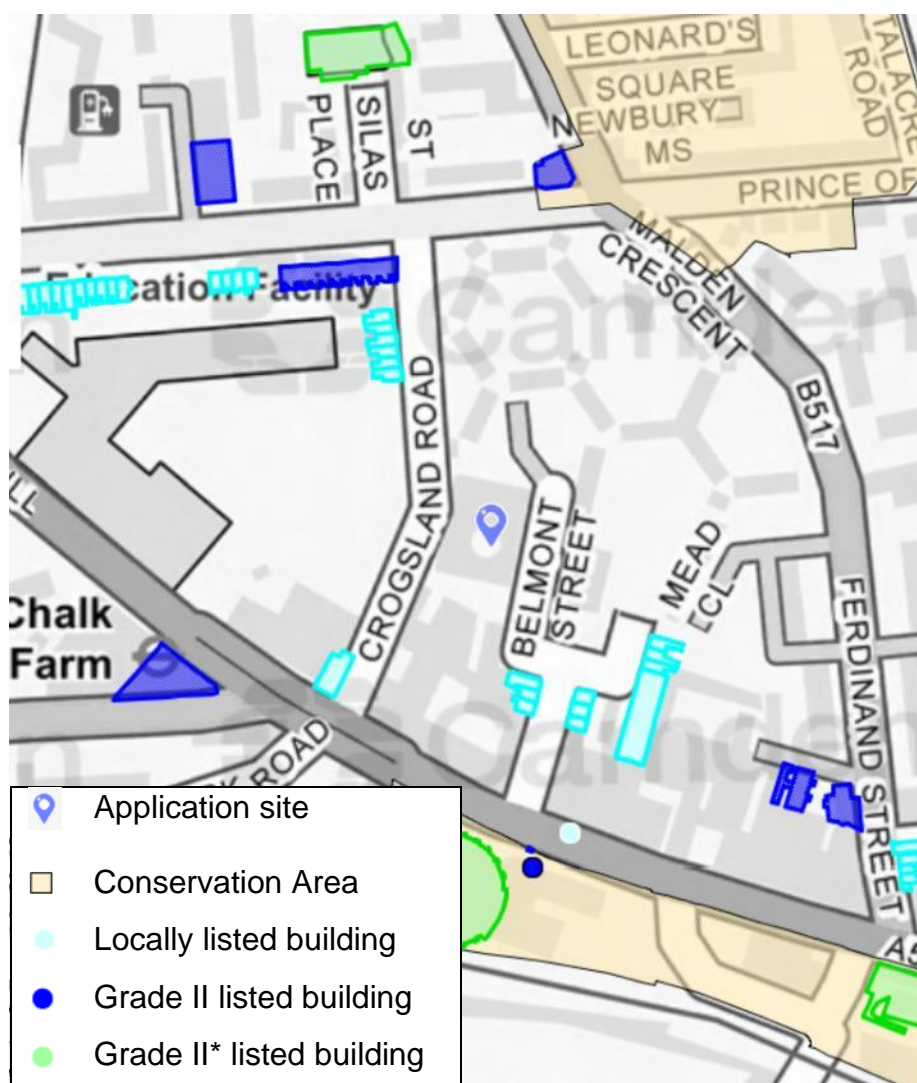
The proposal is considered to be a favourable sustainable development that is in accordance with relevant National and Regional Policy, the Camden Local Plan, Camden Planning Guidance and other supporting policy guidance for the reasons noted above.

Overall the proposed development is considered to benefit the area, and is therefore recommended for approval.

1 SITE

- 1.1 The 0.29ha site, owned by Camden Council, sits between two road frontages: Belmont Street on the east side, and Crogsland Road on the west. The two roads are connected by a public footpath immediately to the north of the site. The site houses the Charlie Ratchford Resource Centre (CRRC). Constructed in the 1970's, the single storey block was in use as a community centre which served residents aged sixty and over. The centre housed a number of organisations including Voluntary Action and Camden Carers who provided activities and information sessions. The majority of these services have now been re-provided in other facilities. The CRRC building itself is considered to be of little architectural merit.
- 1.2 To the north and east are the Denton and Ferdinand Estates, with blocks ranging from four to 21 storeys. To the south of the site are a two-storey light industrial unit fronting on to Crogsland Road, and a three-storey residential block fronting on to Belmont Street.

- 1.3 Galliford Try (now Vistry) Partnerships signed a development agreement with Camden Council to replace the current building with a new extra-care facility and day centre on Crogsland Road opposite the site, which has been completed and was handed over to the Council on 24/11/2020 (see 'Background' section of this report below). The agreement involves the linked redevelopment of the current CRRC site. The CRRC is a key site in the Chalk Farm area and is allocated as an individual site in the Council's 2020 Draft Site Allocations Document for the provision of 124 homes (site ref: IDS20m).
- 1.4 The site is not within a conservation area, though locally listed buildings exist at nos.4-11 Belmont Street, no. 2 Haverstock Hill, and nos. 1-11 Crogsland Road, with the Grade II* listed Roundhouse (which is within the Regent's Canal Conservation Area), and Grade II listed Chalk Farm Station both located on the nearby Chalk Farm Road. A terrace of properties on the southern side of Prince of Wales Road to the north of the site (nos.131-149, odd) is also Grade II listed. See Figure 01 (Heritage map) below.



- 1.5 The site sits within the strategic view, wider setting of the view from Parliament Hill to Palace of Westminster.

2 BACKGROUND

- 2.1 The application site is owned by Camden Council and forms a part of the Council's Community Investment Programme (CIP).
- 2.2 The CIP programme is Camden's response to the extensive cuts of government capital funding that continue to affect the borough. This is at a time when significant investment is required to improve Camden's schools, children's centres, community facilities and the Council's housing stock. The CIP ensures that the Council makes the best use of its property assets through regenerating sites and through selling sites that are now surplus to requirements because they are no longer suitable, underused or expensive to maintain. The CIP is generating funds that would not otherwise be available to reinvest into homes, schools and community facilities for Camden's residents and is making a significant contribution to the Camden Plan. A significant element of Camden's expected growth will take place outside of the identified growth areas and highly accessible areas through the CIP.
- 2.3 The CIP is a key component of how Camden is investing in its communities and improving facilities for residents. CIP invested £117m by 2016/17 in 53 schools and children's centres, improving educational facilities across the borough and creating 420 much needed school places in the north-west of the borough. The CIP is also committed to deliver 9,000sqm of improved community facilities and spaces, provide accommodation for new adult social care services and ensure the homes built are sustainable and energy efficient. The CIP is involving local people in changes to their area, providing opportunities for residents to influence proposals and the designs of developments.
- 2.4 As part of the CIP programme, the elderly care residential use which previously occupied the Charlie Ratchford Resource Centre (CRRC) is being relocated to the opposite side of Crogsland road where it shall occupy a brand new, purposely designed modern building for the same use. Vistry Partnerships signed a development agreement with Camden Council to build the 38 bed extra-care facility and a new day centre for the Council on Crogsland Road and in tandem, to redevelop the existing CRRC building on Belmont Street (subject to planning) for residential use. Work on the new extra-care scheme began in January 2019, it was completed and handed over to Camden Council in November 2020 and will be occupied in April 2021. The current application seeks permission to bring forward the second linked development on the existing CRRC site.

3 PROPOSAL

- 3.1 Planning permission is sought for the demolition of the existing CRRC, and the erection of a part 5, part 7 and part 10 storey building for residential purposes (Use Class C3).

- 3.2 The development would provide 115 flats comprising 89 market flats (36 x studios, 29 x 1 beds, and 24 x 2 beds), and 26 affordable flats (11 x 1 beds, 12 x 2 beds, and 3 x 3 beds).
- 3.3 Whilst the development would form one perimeter building, the general massing of the proposal can be broken into three distinct blocks with link sections between:
- Block A comprises a 7 storey block fronting Belmont Street adjacent to the Hardington housing block.
 - Block B comprises a 10 storey block fronting the Denton Estate on Belmont Street.
 - Block C comprises a 5 storey building fronting Crogsland Road.
- 3.4 These blocks would be joined by two link elements containing flats – these would be set back from the main building line and set down at least one storey from the lowest adjoining main block.
- 3.5 The centre of the site would form a 772sqm courtyard area, with landscaping and a play space for 0-10 year olds. Access to this courtyard would be given to all residents of the development. In addition to this communal courtyard, each flat would have private amenity space in the form of an external balcony.
- 3.6 A total of 173 cycle storage spaces would be provided on site, with the development being 'car-free' (restricting parking permits for future occupiers) with the exception of 3 on-street 'blue badge' spaces, 2 provided on Crogsland Road and 1 provided on Belmont Street. A total of 12 flats (10%) would be wheelchair accessible and adaptable. Refuse storage would be provided internally within each of the three blocks, with collections from Belmont Street and Crogsland Road respectively.
- 3.7 A total of 89 market flats, and 26 affordable flats would be provided. A summary of tenure and mix is provided in Figure 02 below:

Residential	London Affordable Rent	Intermediate Rent	Total Affordable Housing	Market Housing
Studio	0	1	1	36
1 Bed (1b/2p)	0	10	10	29
2 Bed (2b/3p)	0	6	6	8
2 Bed (2b/4)	0	6	6	16
3 Bed (3b/5p/6p)	3	0	3	0
Total	3	23	26	89

Figure 02: Market and affordable housing tenure and mix.

- 3.8 Blocks A and C have an external deck access to the rear; this would be reached by an external staircase facing into the central courtyard area (elevators to each floor also available). To reach these rear staircase areas, access to blocks A and B would be positioned centrally within each of the blocks from Crogsland

and Belmont Street respectively. Block B (the 10 storey building) would have a simple central stair core and elevator with no rear deck access.

- 3.9 Greening is also proposed on the Crogsland Road and Belmont Street as well as on the alleyway to the north of the site linking the two roads.

4 SECTION 106 AGREEMENT

- 4.1 The recommendations are based on certain planning requirements (“Heads of Terms”) being secured in the event of approval. These Heads of Terms would usually be incorporated in a Section 106 Agreement. However in this case although the applicant is Vistry, the Council at this time remains the landowner (anyone with an interest in the land would need to sign the Section 106 Agreement) and as a matter of law the Council cannot enter into a Section 106 Agreement with itself. Consequently, should permission be granted, the Council will enter into a legal agreement with Vistry as applicant and also a ‘shadow’ S106 with itself as landowner. The ** conditions below cover the ‘shadow’ s106 and would fall away in the event that Vistry proceed with the site purchase. Should another party purchase the site, the ‘shadow’ s106 would allow a new s106 to be concluded with that party on the same terms.
- 4.2 Nevertheless it is still imperative that this application is dealt with in a way that is consistent with the way the Council would deal with an application where it does not have land ownership. Therefore the Heads of Term will be embodied in a “Shadow Section 106 Agreement”. This will be in the same form as a “standard” Section 106 agreement, incorporating the “usual” legal clauses and negotiated by separate lawyers within the Borough Solicitors Department representing the interests of the Council as landowner and the Council as regulatory planning authority.
- 4.3 The Shadow Section 106 will include inter alia a provision requiring (i) that in the event of any disposal of the relevant land the Shadow Section 106 Terms will be included in the terms of the sale transfer and (ii) the purchaser will be formally required to enter into a Section 106 agreement as owner of the land at the point of acquisition (and hence its terms will thereafter bind the site).
- 4.4 Once the Shadow Section 106 Agreement has been finalised the Director of CIP and Major Projects (the landowner department) will sign a letter formally undertaking on behalf of the department that its provisions will be complied with in the build out of the development and its subsequent operation.
- 4.5 The Shadow Section 106 Agreement and the Executive Director/Director’s Undertaking of Compliance will be noted on the Planning Register (so the agreement is put on the record in the same way as a “standard” Section 106 Agreement) and compliance with the Shadow Section 106 will be tracked and monitored by the Planning Obligations Monitoring Officers in Development Management in the same way as a “standard” Section 106.

5 REVISIONS/FURTHER INFORMATION

5.1 The following revisions were received during the course of this application:

- Omission of references to 'shared-ownership' provision within the 'Design and Access Statement' and 'Accommodation Schedule'. Reference to shared-ownership was written by the applicant in error and no shared-ownership provision is proposed as part of this scheme. Amended documents were uploaded to the Council's website on 22/12/2020.
- An Outline Fire Strategy was submitted on 15/12/2020.
- Widening of cycle storage access doors (ground floor plan) to 1.2m.

6 RELEVANT HISTORY

6.1 The Charlie Ratchford Resource Centre (CRRC) and associated extra-care site on Crogsland Road has a long planning history, and so only the most relevant has been listed here.

CRRC

2019/0764/PRE - Redevelopment of the existing Charlie Ratchford Resource Centre for residential blocks of flats with associated landscaping and cycle parking - Pre-application advice issued 11/12/2020.

2018/5597/P - Erection of 6 portacabins in double decker arrangement with external access stairs, plus removal of part of the railings on Crogsland Road frontage and replacement with new secure access gate and erection of hoarding around site periphery, for use as a temporary site construction office for a period of 2 years in association with the construction of the new extra care scheme at Crogsland Road granted planning permission on 7.7.16 ref 2015/0921/P (for Redevelopment of vacant site by the erection of a 6 storey building comprising a day centre on the ground floor and 38 extra-care residential flats on the upper floors, plus roof terraces, communal gardens and minibus parking) - Granted 18/01/2019.

2014/7208/PRE - Development and relocation of resource centre and new extra care housing - Pre-application advice issued 21/11/2014.

Extra-care site on Crogsland Road

2019/6264/P - Alterations to planning permission ref 2015/0921/P granted 07/07/2016 (for Redevelopment of vacant site by the erection of a 6 storey building comprising a day centre on the ground floor and 38 extra-care residential flats on the upper floors, plus roof terraces, communal gardens and minibus parking), namely replacement of approved stone work on west elevation (south corner) by render and addition of handrail to glass balustrade on walkway on west elevation – Granted 17/02/2020.

2019/2202/P - Alterations to planning permission ref 2015/0921/P granted 07/07/2016 (for Redevelopment of vacant site by the erection of a 6 storey building comprising a day centre on the ground floor and 38 extra-care residential flats on the upper floors, plus roof terraces, communal gardens and minibs parking), namely 2 additional windows on rear ground floor, additional louvres on rear and side elevations, reduction in height of rear walkway glazed guarding to 1100mm, and omission of roof plant screening - Granted 09/07/2019.

2015/0921/P - Redevelopment of vacant site by the erection of a 6 storey building comprising a day centre (Class D1) on the ground floor and 38 extra-care residential flats (Class C3) on the upper floors, plus roof terraces, communal gardens and minibs parking - Granted 07/07/2016.

7 CONSULTATION SUMMARY

Statutory Consultees

Greater London Authority (GLA)

- 7.1 The London Plan and the Intend to Publish London Plan policies on social infrastructure; housing supply; housing and affordable housing; play space; urban design; residential quality; density; tall buildings; heritage; inclusive design; energy; sustainable urban drainage; urban greening; and transport are relevant to this application. The proposals are broadly supported but do not fully comply with the London Plan and the Intend to Publish London Plan, as set out below:
- 7.2 Principle of development: The existing day care facility is no longer required, having been re-provided on a site opposite the application site. The principle of the site's redevelopment as part of a comprehensive high density residential scheme is therefore strongly supported.
- 7.3 Affordable housing: 30% affordable housing on-site, of which, 79% would be intermediate rent and 21% would be social rent (by habitable room). The application is on public sector land so is subject to the 50% affordable housing threshold. The site is formally linked with the now completed application on Crogsland Road directly opposite the site which provided 38 social rent extra care units and a replacement day care centre. Overall, the two applications provide 50% affordable housing floorspace (48% by habitable room), in line with the Council's 60:40 tenure split requirements. Off-site play provision should be secured.
- 7.4 Urban design and heritage: The design, layout, density, height and massing of the scheme and the architectural and residential quality is supported. The application would give rise to less than substantial harm to the Grade II* listed Roundhouse, which could be outweighed by the proposed public benefits associated with the application. A fire statement is required.

- 7.5 Climate change: The applicant's energy, drainage and urban greening strategies are supported.
- 7.6 Transport: A car-free scheme is proposed (excluding disabled parking which would be provided on-street). This is supported. Cycle parking would comply with the Intend to Publish London Plan and should be designed in accordance with the Mayor's London Cycling Design Standards and secured by condition. Further discussion is required in relation to public realm, walking and cycling improvements.
- 7.7 Play provision: The quantum of provision would be sufficient to meet the requirements generated by children aged 0 to 12 years within the scheme, with off-site provision required to address the play space needs of children above this age. The remaining requirement for additional play space provision to meet the needs generated by the scheme (or older age groups) should be met via a financial payment towards off-site play space facilities in the nearby area.

Officer Response:

- *A Fire Statement has since been provided and is considered to be acceptable subject to the attached relevant condition.*
- *A Pedestrian, Cycling and Environmental improvements (PCE) contribution of £113,000 has been secured as part of this application, see transport and S106 sections of this report.*
- *Play provision is included in the scheme and a public open space contribution covers the shortfall.*

Historic England (HE)

- 7.8 On the basis of the information available to date, we do not wish to offer any comments. We suggest that you seek the views of your specialist conservation advisers, as relevant.

Officer Response:

- *Noted.*

Transport for London (TfL)

- 7.9 The Healthy Streets: The proposed public realm improvements are on private land or local highway rather than the Transport for London Road Network (TLRN). The Council is recommended to secure these improvements through section 278 (S278), S106 or works in kind, as appropriate. All highway works proposed, secured and eventually delivered should follow the design guidance in the TfL streets toolkit and the new TfL Cycle route quality criteria.
- 7.10 Cycle Parking: The application proposes 174 cycle parking spaces in Blocks A, B, and C. This would meet the minimum standards in Policy T5 and Table 10.2 of the Intend to Publish London Plan, which is welcome. Two-Tier cycle racks are proposed except for 5% which will be Sheffield stands. This means at least 5% of the cycle parking will be suitable for larger and adapted cycles which is also welcome. The detailed design of all cycle parking should be secured by

condition. TfL recommends that the applicant considers how the development would link to the closest cycle hire docking station, particularly along Castlehaven Road. Cycle parking locations have been provided but the detailed design of all cycle parking eventually delivered on-site must comply with the London Cycling Design Standards (LCDS), which should be secured by condition.

- 7.11 Car Parking: The development is car free except for 2 Blue Badge car parking spaces proposed on-street along Crogsland Road, where existing double yellow lines would be removed, and 1 on Belmont Street. The Intend to Publish London Plan policy T6 (disabled persons parking) states at least 3% of residential units should have a Blue Badge space provided initially, and a further 7% made available locally on request if needed in future. The further 7% car parking is not initially identified in this application, which is acceptable. However, a Parking Design and Management Plan (PDMP) should be secured by condition in accordance with policy T6 of the Intend to Publish London Plan and discharged prior to commencement of construction. This should include details for the design and management of all parking including LCDS-compliant cycle parking. The PDMP should outline how car parking will be allocated and managed, and how additional disabled car parking could be provided locally on or off site for residents if needed by new resident Blue Badge holders in future (up to a maximum of 10%).
- 7.12 Transport Assessment: In accordance with Policy T4 (Assessing and mitigating transport impacts) a transport assessment (TA) was submitted in the application. However, prior to determination improvements are required to the trip generation analysis. TfL recommends that the net trip generation impact is assessed including all new residential trips proposed. The net trip rates used in the current TA are not likely to be representative of future local travel behaviour, as the Charlie Ratchford Resource Centre will continue to operate.
- 7.13 Construction, Deliveries and Servicing: TfL welcome the applicant's proposal of a formal loading bay along Crogsland Road. Full Construction Logistics (CLP) and Delivery and Servicing Plans (DSP) should be secured by condition.

Officer Response:

- *Whilst complying with London Plan standards, the cycle storage originally proposed (double height stackers) failed to comply with Camden's standards. These were subsequently amended to comply with both TfL and Camden's standards.*
- *A 'Parking Design and Management Plan' is not deemed necessary in this instance as the scheme is car-free. The blue badge bays would be provided on street and would be subject to separate negotiation and is included as a S106 head of term.*
- *Similar concerns regarding the trip generation analysis of the submitted transport assessment were raised by the Council's transport officers, see the transport section of this report.*

Transport for London (TfL) Location Enquiries team (concerning works proposed impact on underground infrastructure)

- 7.14 London Underground/DLR Infrastructure Protection has no comment to make on this planning application as submitted.
- 7.15 This response is made as Railway Infrastructure Manager under the "Town and Country Planning (Development Management Procedure) Order 2015". It therefore relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.

Officer Response:

- *Noted.*

Thames Water

- 7.16 Waste Comments: Thames Water would advise that with regard to FOUL WATER sewerage network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.
- 7.17 Thames Water would advise that with regard to SURFACE WATER network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.
- 7.18 There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.
- 7.19 Water Comments: If you are planning on using mains water for construction purposes, it's important you let Thames Water know before you start using it, to avoid potential fines for improper usage. More information and how to apply can be found online.
- 7.20 On the basis of information provided, Thames Water would advise that with regard to water network and water treatment infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommends an informative be attached to this planning permission: 'Thames Water will aim to provide customers with a minimum pressure of 10m head (approx. 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.'

Officer Response:

- *Noted and informative would be added to any approval.*

Natural England

- 7.21 Natural England has no comments to make on this application.

- 7.22 The lack of comment from Natural England does not imply that there are no impacts on the natural environment, but only that the application is not likely to result in significant impacts on statutory designated nature conservation sites or landscapes.

Officer Response:

- *Noted.*

Sport England

- 7.23 The proposed development does not fall within either our statutory remit (Statutory Instrument 2015/595), or non-statutory remit (National Planning Policy Guidance (PPG) Par. 003 Ref. ID: 37-003-20140306), therefore Sport England has not provided a detailed response in this case.

Officer Response:

- *Noted.*

London Fire Brigade

- 7.24 No response received.

Officer Response:

- *In any event, a condition has been attached to any subsequent consent requiring a Fire Statement to be produced by an independent third party suitably qualified assessor which shall detail the building's construction, methods, products and materials used; the means of escape for all building users including those who are disabled or require level access together with the associated management plan; access for fire service personnel and equipment; ongoing maintenance and monitoring and how provision will be made within the site to enable fire appliances to gain access to the building. The proposal would also be required to comply with current building regulations standard with regards to fire safety.*

Local Groups

Camden Cycling Campaign (CCC)

- 7.25 We represent the interests of cyclists living or working in or travelling through the Borough of Camden. Crogsland Road is a significant link in Camden's cycle network and joins Primrose Hill to Camden via the traffic-free Regents Park Road Bridge.
- 7.26 The CCC comment on the draft CMP submitted as part of the application as follows: Routing to site - The proposed access route for vehicles is westbound on Prince of Wales Road, turning left into Crogsland Road across the cycle lane. This causes a potentially dangerous 'left-hook' situation for cyclists and pedestrians. The approach would be better from the west (i.e. eastbound on Prince of Wales Road) - a right turn into Crogsland Road is less dangerous because mutual visibility is much better and blind-spots are reduced. It is not

sufficient to merely show the route from Prince of Wales Road and exiting onto Chalk Farm Road. To fully judge the impact, the proposed access and egress routes should be shown at least as far as the TLRN.

- 7.27 Pit lane in Crogsland Road - The pit lane appears to take up at least half of the road, allowing only a narrow space for other motor vehicles and contraflow cycling. This is likely to be inadequate. Given that it is proposed to close the footway, the pit lane could partially occupy this space, releasing significant road width back into the public highway.

Officer Response:

- *Routing to site – Draft routing is shown in the CMP pro-forma, with the exact route forming part of the future CMP submission achieved by S106 legal agreement. Nonetheless a similar route to that suggested by the CCC was used for the adjacent extra-care site (eastbound from Prince of Wales Road turning right into Crogsland Road and upon exiting the site southbound before turning left onto Chalk Farm Road) which could be utilised in this application.*
- *Pit lane in Crogsland Road – As above, this was shown in the CMP pro-forma which is subject to final design set out in the full CMP achieved by S106 legal agreement. Nonetheless a similar arrangement has been previously agreed at the adjacent extra-care construction site. Whilst this did temporarily narrow road space, it is understood that there were no significant issues. However, the applicant would be required to ensure a safe and suitable arrangement is proposed prior to the commencement of construction works.*

Neighbours of West Kentish Town

- 7.28 The proposed scheme is massive overdevelopment. The density is 396 flats per hectare, whereas a few years ago Camden advised that an appropriate density for an accessible urban area like this is 225 flats per hectare.
- 7.29 The scheme has only 23 per cent affordable homes and 66 per cent of the flats are one-bedroom, and only three have three bedrooms.
- 7.30 Camden must know this area desperately needs affordable housing, including homes for families.
- 7.31 The configuration of the building, with elevations on both Crogsland Road and Belmont Street, and the height of the blocks proposed, do not allow for meaningful green open space in between. There is a very small amount of external space at the bottom of a narrow courtyard, overshadowed for the most of the day.

Officer Response:

- *The London Plan indicates that in a central area (such as the application site) a density range of between 650-1100hr/ha is acceptable. Proposed here is 396 flats per hectare.*

- *The proposed scheme benefits from an affordable housing credit, linked to the extra care scheme on the opposite side of Crogsland Road which provides 50% affordable housing across both sites. See section 11 for full information on this.*
- *Whilst the market offer of a larger proportion of studios and 1 beds is not in complete compliance with policy H6 on housing mix (which encourages a larger proportion of 2 and 3 bed units) it is acknowledged that the policy is to be applied flexibly. In this instance the affordable housing offer would be 50% across the sites, in an appropriate 60:40 tenure. Given the information submitted, coupled with the other benefits arising from the scheme, and the flexibility in the application of policy H6, the proposal is considered to be acceptable on the basis of mix.*
- *The courtyard area allows for meaningful amenity space for residents, with high quality landscaping, playspace and good access to daylight and sunlight throughout the day. See section 12 of this report.*

West Kentish Town Conservation Area Advisory Committee (CAAC)

- 7.32 We would like to raise our concerns about this application, which is located within a short distance from West Kentish Town Conservation Area. These are as follows:
- 7.33 OVERDEVELOPMENT - Unfortunately this scheme suffers from a lack of space and light, as well as lack of privacy and amenity as a direct result of overdevelopment. We believe that the number of flats on a site of this size is not compatible with a good quality of life and should be reduced by at least 1/3. The recent pandemic has highlighted the risks of sacrificing living standards; it is better to build fewer good quality homes. It is not only considerations of 'conservation areas, listed buildings and views' that should constrain development (as stated on page 26 of the Design and Access statement) but the fundamental need to provide good quality homes.
- 7.34 HERITAGE IMPLICATIONS - The development of this site has implications for the neighbouring conservation areas, i.e. Harmood Street and West Kentish Town conservation areas. It lies to the west of Harmood Street CA and south of West Kentish Town CA. In our view, conservation areas should not be seen as isolated islands, but part of an organic whole. The proposed scheme lies between West Kentish Town CA and the redevelopment site at Camden Goods Yard. The latter is a very high-density scheme, which shares some characteristics with the application scheme, namely lack of appropriate distance between flats, overshadowed, canyon-like spaces between buildings and lack of open space. Allowing this type of development to spread into the hinterland of Chalk Farm Road risks bringing precedents of high-density development into areas characterised by 3 storey high Victorian buildings, and resulting in abrupt changes in scale of development which will harm the conservation areas.
- 7.35 PRECEDENT - It is misguided to refer to the adjoining high-rise blocks from the 1950s-70s in the vicinity of the site as a precedent for the design of the proposed scheme. The Ferdinand Street blocks were planned with plenty of open space around them. Denton Estate is what was called at the time 'mixed

development' where a high-rise tower was combined with low-rise, lower density development. This was done in order to provide adequate space and light around the tower.

- 7.36 **BUILDING MASSING** - We agree with the proposed building height on Crogsland Road, as it relates well to the principal streetscape. However, we believe that the 10 storey element to the north is too high and over-scaled; it will have a detrimental effect on residents of Denton Estate, in terms of outlook, visual amenity and overshadowing. This part of the site should be developed to the same height as the adjoining Denton Estate, as the design brief illustrative scheme suggested.
- 7.37 The open space at the centre of the proposed scheme will be overshadowed and unusable as a space for recreation. Ideally the part of the building facing onto Belmont Street should be omitted altogether as there is not really sufficient space for this amount of building volume on the site- this area could then some useable open space that receives sunlight. If this is not possible for viability reasons, we believe that the height of the building onto Belmont Street should be reduced to no more than three storeys, in order to meet the planning brief (*Officer Comment: This document has no planning status*) this document objective to "relate to the scale of neighbouring buildings", and to allow light into the courtyard.
- 7.38 **PRIVACY AND OVERLOOKING** - The courtyard measures 16-17m across; the minimum should be 18m for overlooking habitable room to habitable room. The narrow dimension will also trap noise and compound the courtyard as a miserable space to be in.
- 7.39 **LACK OF AFFORDABLE AND FAMILY HOUSING** - The proposed scheme offers very little family accommodation. The majority of the 115 flats are 1-bedroom flats and only 3 have 3-bedrooms. This does not provide the accommodation needed to enable the neighbourhood to continue to be a place where families can flourish.
- 7.40 The Design and Access Statement says that social and affordable housing delivery at the Charlie Ratchford site is linked to the site that faces it on Crogsland Road. We are not convinced that the extra-care homes qualify as affordable homes and think that they may fall into the C2 category. Even if technically permissible under planning law, we would hope that the need to provide socially affordable family accommodation in the area would be made a condition of the sale of this publicly-owned site.

Officer Response:

- *Overdevelopment – The proposed flats would be good quality, meeting national space standards and with good access to daylight and sunlight, with largely dual aspect units with private amenity space as well as access to the communal courtyard at the centre of the development. The proposal is considered to fit comfortably on the site and would not represent overdevelopment.*

- *Heritage – The heritage impacts of the scheme (both on conservation areas and listed buildings) is considered in section 10 of this report. There would be no material impact on the setting of nearby conservation areas, and where there is less than substantial harm caused to views of the Roundhouse, this is outweighed by the public benefits arising from the scheme.*
- *Precedent – The high rise blocks are not used as precedents, however they do form a part of the urban context. The design of the proposal is assessed in full in section 10 of this report.*
- *Building massing – The massing of the building is considered to be appropriate within the current context (see section 10 of this report). The courtyard area allows for meaningful amenity space for residents, with high quality landscaping, playspace and good access to daylight and sunlight throughout the day. See section 13 of this report.*
- *Privacy and overlooking – The amenity of future occupiers is assessed as acceptable, see section 12 of this report.*
- *Lack of affordable and family housing - Whilst the market offer of a larger proportion of studios and 1 beds is not in complete compliance with policy H6 on housing mix (which encourages a larger proportion of 2 and 3 bed units) it is acknowledged that the policy is to be applied flexibly. In this instance there is an affordable housing offer of 50% across the site and linked extra-care centre, in an appropriate 60:40 tenure. Given the information submitted, coupled with the other benefits arising from the scheme, and the flexibility in the application of policy H6, the proposal is considered to be acceptable on the basis of mix.*
- *The proposal offers 26 affordable houses across the site, in addition to the extra-care site on Crogsland Road, equating to 50% of the total floorspace in complete compliance with relevant policies.*

Adjoining occupiers

Total number of responses received	04
Number in support	00
Number of objections	04

- 7.41 Site notices were displayed from 11/11/2020 inviting comments until 05/12/2020.
- 7.42 A local press advert was placed on 14/01/2021 inviting comments until 07/02/2021.
- 7.43 Letters of objection were received from 8 Hardington, 129 South End Close, 9A Crogsland Road & 139 Prince of Wales Road, they are summarised below:

Design:

- 7.44 It seems the proposed design is merely the most efficient box shape to accommodate the maximum number of apartments. The only consideration to the area is in being no taller than on a nearby building of 11 storeys to preserve the Hampstead Heath sightline.
- 7.45 Within sight of the Roundhouse is there an opportunity for the Architects to reflect the curve of both this iconic building and the road on which they are building in a more sympathetic design?
- 7.46 Belmont Street and Crogsland Road are both quiet, residential side streets and the proposal is too big for the space available.
- 7.47 Massive over-development of the site, and out of keeping with the surrounding area.

Officer Response:

- *The siting, scale, massing and design of the building has been reviewed by Design Officers and at the Design Review Panel, and is considered to be appropriate within the context (see section 10 of this report).*
- *The development is considered to be of an appropriate massing, and would not represent over-development of the site (see section 10 of this report).*

Impact on neighbours:

- 7.48 The 10 and 7 storey elements will tower over neighbours meaning they will become considerably overlooked.
- 7.49 Daylight will be removed from Denton and Hardington homes, and a row of 6 X 2-storey family homes will be in 24-hour darkness.
- 7.50 This proposal introduces the possibility of a further 250+ people to the area.
- 7.51 The 'U' shape design makes the development insular, blocking out the surrounding community rather than becoming an integrated part of it.
- 7.52 Removes the one piece of green space in the surrounding area.
- 7.53 Overshadows the Denton Estate which is one of Camden's best developments.
- 7.54 The application states that the New Charlie Ratchford Centre has been assigned a 'high sensitivity' category, meaning that the design of the new development is such that it has minimal light impact towards it. In effect, the new development is designed to deliver all light impacts on surrounding existing homes, so that the new Charlie Ratchford Centre is not impacted. This is completely unfair and unacceptable to residents that have lived in the area for many, many years.

Officer Response:

- *The proposal has been assessed in terms of its impacts on daylight/sunlight, outlook and privacy of neighbouring residents (see section 14 of this report), and is considered on balance to be acceptable.*
- *The design of the proposal is considered to be acceptable (see section 10 of this report), and rather than removing the green space, the proposal would enhance the green space with high quality landscaping and play-space provision (in addition to private amenity space) for residents.*

Density:

- 7.55 This project should not be taken in isolation and members should consider other developments taking place in the immediate locality, including the huge regeneration of Juniper Crescent and Morrison's supermarket, together with the Marine Ices and Peppiatt's redevelopment. There will be a huge increase in the area's population.
- 7.56 Given the density it is essential that a masterplan is developed for the area before any current or future proposals are considered. What is the infrastructure impact? Is public transport suitable for the rise in population? Are there sufficient schools, hospitals and doctor's surgeries available?

Officer Response:

- *The London Plan seeks to optimise site development and assess density according to area character and its location and degree of accessibility. Proposed here is 396 flats per hectare. Whilst there are other large-scale projects in this area, the density of this proposal is considered to be acceptable. The other projects mentioned by the resident have been assessed in terms of their impact on the wider area also each making suitable contributions to community infrastructure commensurate with their scale.*

Unit Mix:

- 7.57 A minimum 56% of the proposed units would be studio or 1 bed flats, contributing further to the density.
- 7.58 Fails to provide for families.

Officer Response:

- *Whilst the market offer of a larger proportion of studios and 1 beds is not in complete compliance with policy H6 on housing mix (which encourages a larger proportion of 2 and 3 bed units) it is acknowledged that the policy is to be applied flexibly. In this instance there is an affordable housing offer of 50% across the site, in an appropriate 60:40 tenure. Given the information submitted, coupled with the other benefits arising from the scheme, coupled with the flexibility in the application of policy H6, the proposal is considered to be acceptable on the basis of mix. In any event, 3 x 3 bed affordable houses would be provided and the 2 bed 4 person units would be considered appropriate for families.*

Affordable housing:

- 7.59 The proposal represents 23% affordable housing, well below the 50% target. The extra-care site is completely separate, and linking the two is a clear attempt to circumvent providing sufficient levels of affordable housing.
- 7.60 The proposals do not state the size of the affordable homes. Camden is desperate for quality, affordable, family homes, but this project delivers none.

Officer Response:

- *26 affordable flats (11 x 1 beds, 12 x 2 beds, and 3 x 3 beds) would be provided on site. Given the affordable housing credit from the provision of the extra-care site, the proposal would represent 50% affordable housing provision across the two sites in compliance with policy.*

Incorrect/outdated information contained within the submission:

- 7.61 The Transport Statement does not reflect the changes to Prince of Wales Road. It also makes some factually incorrect comments such as Crogsland Road having pedestrian crossings – these are temporary and will be removed, and parking on Chalk Farm Road being residential, when it is Pay and Display.
- 7.62 The Daylight Sunlight assessments within the application do not consider impact to 1 – 11 Crogsland Road. The 10-storey elevation will tower above the Denton Estate and therefore will affect our building.
- 7.63 There is no Transport Management Plan within the application. It remains unclear how the development will be serviced during building works. Belmont Street and Crogsland Road are narrow streets and will have parking on both sides. Removal of parking spaces to aid development will need to be secured elsewhere as there is no longer additional parking available on Prince of Wales Road, as it has been drastically reduced. Additionally, opposite the site on Crogsland Road is the new Charlie Ratchford Centre that accommodates adults with extra care needs. Ambulance and healthcare services will require 24-hour access to the site. It is imperative that a TMP is developed before the application is considered.

Officer Response:

- *The Transport Statement was subsequently updated to correct these discrepancies.*
- *The application site is a significant distance from the properties at 1-11 Crogsland Road, and would not unduly impact upon the daylight/sunlight reaching them. The impact on the closest buildings forming part of the Denton Estate has been considered in section 14 of this report.*
- *Full details of how the construction would be managed would be achieved by a Construction Management Plan (CMP) which would be secured by S106 subject to approval. The CMP would consider the impact on parking availability in surrounding roads and the specific needs of this site and the*

surrounding area, particularly given the siting of the linked extra-care site opposite on Crogsland Road.

Failure to follow due process:

- 7.64 As freeholder/landlord of these properties, LBC development officers contractually signed away any right to light for them without discussion or consultation with residents. This is a clear attempt to offer preferential treatment to the developer. The impact on surrounding properties has been ignored to maximise space available and LBC officers have acted inappropriately to assist the developer.
- 7.65 Local residents were invited to a 'drop-in' viewing of proposals, but the final plans have not been formally shared.
- 7.66 Residents have not received written notice of the application being made, it has only been advertised on lamp posts in the immediate area. Anyone without online access cannot view or comment on the plans. There are instances where residents have telephoned the number advertised, but no information has subsequently been supplied. People without internet access have been excluded and disenfranchised from their rights to consider and comment.
- 7.67 Consultation began on 10/11/2020, national lockdown (due to Covid-19) began on 05/11/2020 requiring people to stay at home.
- 7.68 Information has not been supplied to residents despite requests for it.

Officer Response:

- *Rights of lights issues are separate to the planning process. Section 14 deals with neighbour amenity considerations material to the planning application.*
- *The applicant shared the final design on their consultation website prior to the submission of the application (see 'Applicant's Own Consultation' paragraphs 7.75 to 7.82 of this report).*
- *13 site notices were posted in the surrounding area, and a local press-advert was published. Amenity groups were notified, and anyone who has signed up to the Council's e-alert service were notified. This is in addition to the applicant's own consultation. All of which is in complete compliance with the Council's Statement of Community Involvement.*
- *Concerns have been raised that those without internet access have not been able to comment on the application. The proposals have been discussed with the resident concerned, and the applicant posted hard copies of plans to the interested party. Any requests from residents for information have been answered with information supplied.*

Request for conditions should approval be recommended:

- 7.69 Working hours restricted to Mon – Friday, 8am to 6pm. No requests for extensions beyond this to be considered.

- 7.70 Council enforcement officers tightly monitor and control the behaviour of this developer and do not allow infringements to go unchecked, and even penalised where necessary.
- 7.71 All public health regulations, including Covid-19 to be strictly adhered to and enforced.

Officer Response:

- *Working hours of construction are covered by separate legislations, parts of which would form a part of the Construction Management Plan to be agreed by S106 legal agreement, with enforcement action taken where necessary.*

Design Review Panel and Applicant's own consultation (Pre-application)

Camden Design Review Panel (DRP)

- 7.72 Earlier iterations of the scheme were presented to the Design Review Panel (DRP) on 01/03/2019 and 26/04/2019. Given the early stages of the design process, these reviews generally concerned density, scale, bulk and townscape views. The design has been developed since these earlier iterations of the scheme, and the design was presented to the DRP again on 13/03/2020 to seek the panel's view on siting, scale, design, the 'link' elements, architecture and materiality (as well as welcoming any other comments). Feedback from the DRP is as follows:

"The panel welcomes the revisions that have been made to the scheme in terms of scale, architecture and landscape design, and now broadly supports the proposals. It suggests further refinement to specific areas to ensure the proposals are of the highest possible quality. The design of the entrances could be more distinctive, and they could be widened to provide greater presence and views into the building. Re-planning entrance lobbies to create views through to the inner courtyard and give direct access to bicycle stores and stairs would be an enhancement. Ground floor fenestration and detail, for example of service doors, would benefit from further refinement. The design of the courtyard and link element elevations would benefit from further thought, and are an opportunity for delight. Balconies design on Building A could have curved edges to reflect those at the neighbouring Mead Close; north-facing balconies in Building B would ideally be relocated to the south side. Ground floor bedrooms should be avoided: where they face Crogsland Road careful boundary treatment is required to separate them from the street. The privacy of ground floor spaces facing the courtyard could be improved by creating small private garden areas. The lack of surveillance of the public route at ground floor level on the northern edge of the development is a concern. This route should be improved, potentially widened, and integrated with a wider pedestrian masterplan for the area - to be developed in collaboration with Camden Council. The panel query the benefit of the southern visual link through the site in its current form: it should preferably be widened at the Belmont Street side, but if this not possible this narrow gap could be closed

up, with accommodation added here, and a wider northern route provided. The panel encourages further thought about sustainable construction methods, and proposals for reducing embodied energy.”

“The panel feels confident that the applicants can resolve its comments in collaboration with Camden officers. It would support Camden officers requesting sufficient information as part of the planning submission to ensure the quality of construction detailing and materials.”

7.73 Since this time the development has continued to evolve and has responded to this advice.

- The entrances and lobbies to Building A fronting Belmont Street and Building C fronting Crogsland Road have been widened further and the extent of glazing increased considerably to create generous and welcoming frontages to the street and spacious waiting areas for residents using the lifts to access the upper floors. The use of red glazed brick has been rethought, and a portico has been utilised to announce each entrance to the street. Building B has been updated to have a more vertically emphasised entrance, referencing the Art Deco mansion buildings.
- The entrance lobbies have been re-planned to provide glimpsed views through the landscaped courtyard beyond. Access to the bike stores is proposed to be taken via the external entrances to the courtyard from the south-east and south-west corners of the site.
- The white brick plinth previously shown at ground floor has been replaced with buff brick to provide a more robust and durable treatment at street level, with a white brick banding detail helping to differentiate between the ground floor and upper floor levels.
- The street facing link building elevations have been treated in stacked bonded red and white glazed bricks, replacing the previously shown white brick treatment, and creating a moment of joy and delight to passers-by walking along Belmont Street and along the northern footpath.
- The balconies to each main building have been updated to feature curved edges, making strong reference to neighbouring Mead Close and creating a consistent and cohesive architectural feature of the proposal.
- Bedrooms to the street have been limited as far as possible. Both family apartments at ground floor of Building A have bedrooms to the rear of the plan fronting the courtyard. There would be private terraces and defensible planting creating a buffer between the bedrooms and shared courtyard space. There are no ground floor apartments proposed in Building B. For Building C, there is a minimum 1.5m defensible zone between ground floor apartments and Crogsland Road with a robust railing boundary treatment proposed.
- All ground floor accommodation facing the courtyard would feature private defensible space, provided as either a private terrace or planted buffer.
- The suggestion of widening the footpath has been reviewed by pulling the building blocks further to the south, however, this creates an undesirable relationship with neighbouring development to the south of the site. To respond to DRP comments, an alternative entrance and windows have been provided to the northernmost cycle store providing an opportunity for further ground floor activity. The residential accommodation at first floor is

closer to street level owing to the site levels and provides good opportunities for passive surveillance along the footpath.

- The openings to the south-west and south-east of the site each provide a moment of relief in the frontage to the street and an opportunity to extend the greenery from the courtyard to the street edge.
- Although the construction method of the scheme has not yet been decided, we have considered other features that ensure a highly sustainable design which embraces urban greening, energy efficiency and passive design measures to limit its energy demands and CO2 emissions.

- 7.74 The Panel's comments were generally very supportive of the scheme; where aspects were highlighted "to ensure the proposals are of the highest possible quality", these have been considered and subsequently fully realised as the scheme has progressed.

Applicant's own consultation

- 7.75 The applicant has submitted a Statement of Community Involvement (SCI) which details the measures taken by the applicant to consult residents and interested parties and respond to any concerns or comments raised.
- 7.76 The applicant held two public consultations; the first in April-May 2019 and the second in February 2020. They were attended by a mixture of local workers, residents and groups. Meetings were also held with other key stakeholders and a final stakeholder update was conducted in August 2020.
- 7.77 Flyers notifying residents of the consultation events were sent to 1,711 local residents and businesses – the distribution area of these residents is contained in Figure 03 below. Posters were also exhibited in the Harington block (Belmont Street), across the Denton Estate and in local public houses and newsagents (as well as within the CRRC itself). A website was launched on 15/04/2019 with an online feedback section.



Figure 03: Flyer distribution area for community engagement (sent April 2019 and February 2020).

- 7.78 The feedback from these sessions was generally supportive, 85% of respondents supported the delivery of affordable housing and 57% supporting the overall number of homes provided. 77% of respondents supported the car-free nature of the scheme.
- 7.79 Concerns were raised regarding construction management and views from Hardington (and subsequent impacts on daylight/sunlight). The construction management concerns would be mitigated with the submission of a Construction Management Plan (CMP) secured by a S106 legal agreement. A daylight/sunlight report has been submitted to demonstrate the impact on residents (which is assessed in the relevant neighbouring amenity section of this report).
- 7.80 Some concerns were raised surrounding crime and antisocial behaviour as a result of the originally proposed the footpath to the south of the site: this has subsequently been removed from the proposal, alongside improvements to the existing footpath to the north of the site. Respondents were generally supportive of plans to improve the public footpath to the immediate north of the site.
- 7.81 Concerns were raised at the February 2020 consultation with regards to height, where 72% of respondents expressed concerns, particularly surrounding the 10 storey Block B, but also generally across the site.
- 7.82 1,711 notification letters were sent to neighbours providing a final update prior to the submission of this planning application. The plans were made available on the applicant's website. Concerns raised at this stage centred around the design, density, impact on residents, affordable housing provision, the 'car free' nature of the scheme and community benefits. These concerns were reiterated within the Council's own consultation process, and have been responded to

within this report. Please see the relevant sections on design, affordable housing, impact on neighbours and 'car free' development within this report.

8 POLICIES

- 8.1 The National Planning Policy Framework (NPPF) sets out the government's planning policies for England and how these are expected to be applied. It must be taken into account in preparing the Development Plan, and is a material consideration in planning decisions. The revised NPPF was published 24 July 2018 and updated on 19 February 2019, replacing the previous document published in March 2012.
- 8.2 The Camden Local Plan was adopted by the Council on 3 July 2017 and replaced the Core Strategy and Camden Development Policies documents as the basis for planning decisions. Other local documents which are of relevance include the Proposals Map, and Camden Planning Guidance (CPG).
- 8.3 The Camden Site Allocations Local Plan (SALP) was adopted on 9 September 2013. The site is not noted within the 2013 SALP, however the document is currently under review and a New SALP for Camden is currently in its draft stage. The site is allocated in the draft SALP as an individual site (site ref: IDS20m). The draft allocates the CRRC site for residential purposes, with the provision of 124 residential flats. Whilst not yet adopted, the Draft SALP represents a material consideration in the determination of the application.
- 8.4 The London Plan 2021, along with the Mayor's Supplementary Planning Guidance (SPG), are also important considerations as are sections 16, 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 8.5 In making any decisions as part of the planning process, account must be taken of all relevant statutory duties including section 38(6) of the Planning and Compulsory Purchase Act 2004. Section 149 of the Equality Act 2010 is also relevant to the determination of the application. It sets out the Public Sector Equality Duty, which states that a public authority must have due regard to eliminate discrimination, harassment and victimisation; advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 8.6 The relevant Camden Local Plan 2017 policies are listed below:
 - G1 (Delivery and location of growth)
 - H1 (Maximising housing supply)
 - H4 (Maximising the supply of affordable housing)
 - H6 (Housing choice and mix)
 - H7 (Large and small homes)
 - C1 (Health and wellbeing)
 - C2 (Community facilities)
 - C5 (Safety and security)
 - C6 (Access for all)
 - E1 (Economic development)

- A1 (Managing the impact of development)
- A2 (Open space)
- A3 (Biodiversity)
- A4 (Noise and vibration)
- D1 (Design)
- D2 (Heritage)
- CC1 (Climate change mitigation)
- CC2 (Adapting to climate change)
- CC3 (Water and flooding)
- CC4 (Air quality)
- CC5 (Waste)
- T1 (Prioritising walking, cycling and public transport)
- T2 (Parking and car-free development)
- T3 Transport infrastructure)
- T4 (Sustainable movement of goods and materials)
- DM1 (Delivery and monitoring)

8.7 Relevant supplementary planning guidance is listed below:

Camden Planning Guidance (CPG):

- CPG Access for all
- CPG Amenity
- CPG Air Quality
- CPG Biodiversity
- CPG Design
- CPG Developer contributions
- CPG Energy efficiency and adaptation
- CPG Interim Housing
- CPG Planning for health and wellbeing
- CPG Public open space
- CPG Transport
- CPG Trees
- CPG Water and flooding

Site Allocations Plan (Draft, March 2020)

London Borough of Camden Housing Delivery Test - Action Plan dated August 2020

8.8 In accordance with the requirements of the Government's Housing Delivery Test, the Council has published a Housing Delivery Test Action Plan. This sets out a series of actions to ensure that Camden is able to meet its housing requirement in future years. The housing delivery plan has been produced as the data shows that housing completions in Camden in recent years have fallen below the borough's housing delivery target. Between 2016/17 and 2018/19, Camden had a target of 3,360 new homes and 2,924 were delivered. This equates to 87%. Under the 2019 rules if delivery falls below 95%, authorities must publish an action plan to explain how they intend to increase delivery in future years. This should be taken into account when the Council are making

decisions on applications which if approved would enable the delivery of additional housing for the borough.

ASSESSMENT

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

9	Land Use <ul style="list-style-type: none"> • Principle of large-scale development • Loss of community centre (F2(b)) • Residential (C3) • Conclusion
10	Design, Character and Appearance, Impact on Heritage Assets <ul style="list-style-type: none"> • Introduction • Legislative background • Heritage assets • Views • Surrounding townscape • Assessment of proposals • Layout • Scale and massing • Appearance and architectural detailing • Views • Formation of courtyard and greening • Improvements to the northern public footpath • Impact on the heritage assets • Conclusion
11	Housing Mix, Unit Size, and Affordable Housing <ul style="list-style-type: none"> • Policy review • Amount of housing provided • Affordable housing and housing credit • Mix of unit sizes • Interest from registered providers (RPs)
12	Quality of Accommodation <ul style="list-style-type: none"> • Policy review • Design and layout • Daylight/sunlight • Outlook • Privacy • Noise and vibration • External amenity space • Conclusion
13	Open space, Landscaping, Trees and Nature Conservation and Biodiversity <ul style="list-style-type: none"> • Introduction • Public Open Space

	<ul style="list-style-type: none"> • Landscaping • Green roofs • Nesting birds, bats and biodiversity • Trees • Conclusion
14	Neighbouring Amenity <ul style="list-style-type: none"> • Introduction • Daylight/sunlight, overshadowing and light pollution • Daylight analysis • Sunlight analysis • Outlook • Overlooking/loss of privacy/light spill • Noise and vibration impacts
15	Transport and Highways <ul style="list-style-type: none"> • Policy review • Site overview • Trip generation • Cycle parking • Car parking • Highways works • Pedestrian, cycling and environmental improvements • Delivery and servicing activities • Managing the impact of construction • Travel planning • Summary and Conclusions
16	Sustainable Design and Construction
17	Air Quality
18	Flooding and Drainage
19	Accessibility
20	Community Safety
21	Land Contamination
22	Waste Management
23	Economic Benefits, Local Employment and Procurement
24	Health and Wellbeing
25	Equality <ul style="list-style-type: none"> • Legislation • Consideration
26	Fire Safety
27	Section 106 (S106) Obligations
28	Community Infrastructure Levy (CIL)
29	Conclusion
30	Recommendations
31	Legal Comments <ul style="list-style-type: none"> • Conditions • Informatives

9 LAND USE

- 9.1 As existing, the site has 1,185sqm of floorspace (GIA) across the single storey Charlie Ratchford Resource Centre (CRRC) block. The CRRC was in use as a community centre/day care centre (Use Class F2(b) – formerly D2) which served residents aged sixty and over. The centre housed a number of organisations including Voluntary Action and Camden Carers who provided activities and information sessions. The majority of these services have now been re-provided in other facilities in the Greenwood centre, including the new CRRC opposite. Vistry (formerly Galliford Try) has signed a development agreement with Camden Council to replace the current building with a new extra-care facility and day centre located on the adjacent site on Crogsland Road (see Figure 04 below). The new community and extra-care centre was approved in 2016 (ref: 2015/0921/P dated 07/07/2016), and has completed construction, and was transferred to the Council on 24/11/2020.

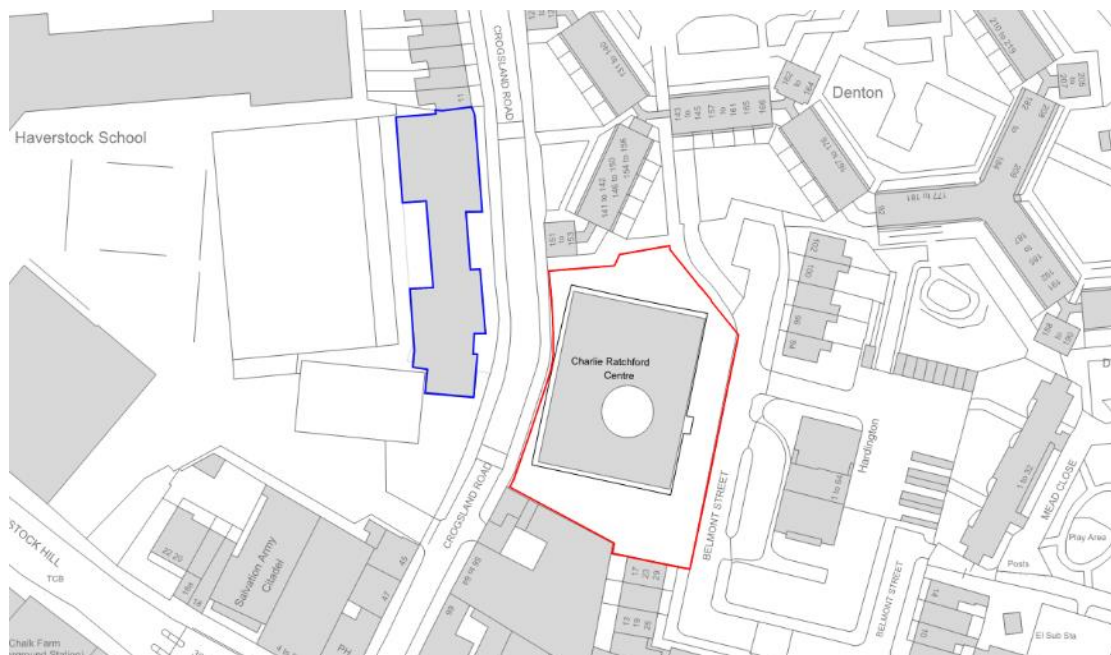


Figure 04: Location plan – CRRC site outlined in red, associated extra-care centre outlined in blue.

- 9.2 Whilst the community space is provided as part of the linked extra-care site (ref: 2015/0921/P dated 07/07/2016), this application proposes the removal of the CRRC and 1,185sqm (GIA) of community space, to be replaced with 9,226sqm (GIA) of residential floorspace.

Principle of large-scale development

- 9.3 Policy G1 notes that the Council will deliver growth by securing high quality development and promoting the most efficient use of land and buildings in Camden by supporting development that makes the best use of its site, and resisting development that makes inefficient use of Camden's limited land. G1

also seeks the provision of a mix of uses where appropriate, in particular in the most accessible parts of the borough. The policy notes development will take place across the borough with the most significant growth within the designated Growth Areas.

- 9.4 Whilst the site is outside of a designated Growth Area, the site is currently under-utilised with an inefficient single storey 1970s block. The site is also highlighted within the Site Allocations Plan (Draft, March 2020), as an individual site for the provision of 124 flats (site ref: IDS20m).
- 9.5 When considering the principle of the development with the objectives of policy G1, it is evident that this is an appropriate redevelopment. The site is in a highly accessible location, and would provide a large number of residential units, with affordable housing, and the linked provision of the extra-care and community centre on the adjacent site (approved under ref: 2015/0921/P dated 07/07/2016). It is therefore a suitable site for a large scale development such as that proposed, and the principle of development would accord with the objectives of policy G1.
- 9.6 The proposed scheme is considered to optimise the site within an area of good public transport accessibility and provide a good level of amenity for future occupants while protecting the amenity of neighbours and being of a high quality design.
- 9.7 Given the above, the principle of a residential development within this largely residential area close to existing public transport links is considered to be acceptable.

Loss of community centre (F2(b))

- 9.8 Policy C2 sets out how the Council will ensure that there is provision of community facilities to meet the needs of a growing population and safeguard against the loss of viable community facilities. This is linked to the Camden Plan's aims of 'investing in our communities to ensure sustainable neighbourhoods' and 'creating the conditions for and harnessing the benefits of economic growth'.
- 9.9 The term "community facilities" refers to a wide range of social infrastructure that provides a service to the community. This includes childcare, education, adult learning and training, healthcare, police stations, youth provision, libraries, public houses, community halls, places of worship and public toilets.
- 9.10 For the foreseeable future, many of these community facilities are expected to experience reductions in funding, increased levels of demand and rising expectations. The long-term sustainability of facilities is a particular concern as funding continues to decline. The Council's Community Investment Programme is helping to re-invest proceeds from the disposal and redevelopment of land and buildings back into new and updated community facilities.

- 9.11 As noted earlier in the report, the community centre would be re-provided in the adjacent, purpose-designed building on Crogsland Road and the existing occupiers have been rehoused in the Greenwood Centre. The CRRC currently has a floorspace of 1,185sqm (GIA), with the new community and extra-care centre (completed and handed over to the Council on 24/11/2020) providing 3,568sqm (GIA) of modern, purpose built community and extra-care space. Given the re-provision of the community floorspace, the proposed development would not result in a loss of community floorspace and is considered to be acceptable in this regard.

Residential (C3)

- 9.12 Policy H1 focuses on maximising Camden's supply of housing. The Council will aim to secure a sufficient supply of homes to meet the needs of existing and future households by maximising the supply of housing and exceeding a target of 16,800 additional homes from 2016/17 - 2030/31, including 11,130 additional self-contained homes. The policy regards housing as Camden's priority land use.
- 9.13 Subsection (c) of policy H1 notes that the Council will resist alternative development of sites identified for housing. This site is also highlighted within the Site Allocations Plan (Draft, March 2020), as an individual site for the provision of 124 flats (site ref: IDS20m).
- 9.14 Policy H1, subsection (d) notes that where sites are underused or vacant (as is the instance here), the Council will expect the maximum reasonable provision of housing that is compatible with any other users needed on the site.
- 9.15 Proposed is 9,226sqm (GIA) of on-site residential accommodation. This would comprise 115 flats with a mix of studios, 1, 2 and 3 bed units. The units would be housed in 3 blocks across the site (Blocks A, B and C), at 5, 7 and 10 storeys fronting on to Crogsland Road and Belmont Street. This would provide a mix of affordable and market units, with 89 market flats (36 x studios, 29 x 1 beds, and 24 x 2 beds), and 26 affordable flats (11 x 1 beds, 12 x 2 beds, and 3 x 3 beds) – totalling 115 flats provided as a result of the development.
- 9.16 Full details of the mix, affordable housing provision, quality of accommodation etc are contained within section 11 of this report. However as outlined within policy H1, housing is the priority land use within the Borough and the Council would strongly support the provision of housing. Residential units on this site are therefore welcomed.

Conclusion

- 9.17 In light of the above, it is considered that the proposal would optimise the amount of residential accommodation on the site, including an affordable housing provision, which would contribute to growth within the borough which is in accordance with the overall objectives of the Local Plan. The above matters and other priorities are discussed further in the relevant sections within the report.

10 DESIGN, CHARACTER AND APPEARANCE, IMPACT ON HERITAGE ASSETS

Introduction

- 10.1 The site is located close to the Chalk Farm Station, and sits between two road frontages: Belmont Street on the east side and Crogsland Road on the west. It houses a single storey block, the Charlie Ratchford Resource Centre (CRRC), a day care centre built in the early 1970s. The building itself is of little architectural merit, finished in painted render, with UPVC framed fenestration and an overhanging flat roof on exposed columns. The Belmont Street frontage (east elevation) is set back from the road and set to concrete, creating a large impermeable surface for parking. The main access to the building is achieved from this elevation, with a canopied area demarking the entrance to the building. A public footpath exists to the northern boundary of the site, linking Belmont Street to Crogsland Road. Due to the topography of the area, Crogsland Road is set above the eastern elevation, meaning no access can be achieved to the building at present from Crogsland Road. Street trees align the Crogsland Road frontage, but the frontage is largely closed on this western elevation. An area of green space exists towards the southern end of the site housing some semi-mature and mature vegetation. Public access is not granted to this green space, which is fenced off on both the Belmont Street and Crogsland Road elevations.

Legislative background

- 10.2 The host building is not listed, nor is it located within a conservation area. There are listed buildings within the area, notably the Chalk Farm Underground Station (Grade II, approximately 110m away as the crow flies) and the Roundhouse (Grade II*, approximately 120m away). Further listed buildings exist to the north of the site on the southern side of Prince of Wales Road (nos. 131-149). The West Kentish Town Conservation Area exists approximately 130m to the north, and the Regent's Canal Conservation Area exists approximately 100m to the south. Locally listed buildings also exist at nos. 4-11 Belmont Street, no. 2 Haverstock Hill, and nos. 1-11 Crogsland Road, with the closest on Belmont Street approximately 35m away. See the heritage map at Figure 01.
- 10.3 Whilst it would not be visible from the conservation areas, the proposal would be visible from, and within the setting of the aforementioned locally listed buildings. It would also impact on the setting of the Grade II* listed Roundhouse in views southwards along Crogsland Road.

The Planning (Listed building and Conservation Area) Act 1990

- 10.4 In considering developments affecting listed buildings or their setting, Section 66 (under planning applications) requires local planning authorities to have special regard to the desirability of preserving the buildings and their setting, as well as any features of special architectural or historic interest they possess.

The National Planning Policy Framework 2019 (NPPF)

- 10.5 The NPPF requires its own exercise to be undertaken as set out in chapter 16 - Conserving and enhancing the historic environment.
- 10.6 Paragraph 127 states that planning policies and decisions should ensure that developments function well and add to the overall quality of an area; are visually attractive as a result of good architecture, layout and appropriate and effective landscaping; and are sympathetic to local character and history, including the surrounding landscape setting.
- 10.7 Paragraph 189 states that in determining applications, local authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution to their setting.
- 10.8 Paragraph 190 requires local planning authorities to identify and assess the particular significance of any heritage assets that may be affected by a proposal.
- 10.9 Paragraphs 193-196 and 202 require consideration as to the impact of a proposed development on the significance of a designated heritage asset, including an assessment and identification of any harm/the degree of harm. Paragraph 196 states:

‘Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.’
- 10.10 The National Planning Policy Framework guides our decision making on how to safeguard this special interest.

Design quality (Camden Local Plan, adopted 2016)

- 10.11 The Council's design policies aim to achieve the highest standard of design in all developments, including where alterations and extensions are proposed. Policy D1 of the Local Plan requires development to be of the highest architectural and urban design quality to improve the function, appearance and character of the area; and policy D2 states that the Council will preserve, and where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas and listed buildings.

Site Allocations Plan (Draft, March 2020)

- 10.12 The site is the subject of an updated Site Allocation in the draft Camden Site Allocation Local Plan 2020 (site ref: IDS20m). Whilst the site is allocated for 124 flats with no guidance regarding design, development of this type in Camden is expected to be of excellent architectural quality, and contextually appropriate design.

Surrounding townscape

10.13 The area around the site has a mixed townscape character of differing periods and scale. Much of the immediate area has seen a significant level of change since it was first developed in the late nineteenth century following bomb damage during the Second World War. The site is situated within the Denton Estate completed in 1973. The estate comprises of a mix of low, medium and a high rise towers at 2, 4 and 22 storeys respectively. To the east opposite the site, on Crogsland Road, the recently completed new Charlie Ratchford Centre is a part 6 part 5 storey building with a setback roof storey. Immediately adjacent to this building and on the approach from Chalk Farm Road are remnants of the street's Victorian heritage with terraces at 3 storeys. To the west, opposite the site, on Belmont Street is the apartment block, Hardington at 11 storeys. Further east still is the Ferdinand Estate at 6-8 storeys.

Assessment of proposals

10.14 There are four main elements to the proposed development on the site:

- Formation of Blocks A, B and C: Block A, 7 storeys fronting Belmont Street (facing the Hardington Building); Block B, 10 storeys fronting Belmont Street (facing the Denton Estate); and Block C, 5 storeys fronting Crogsland Road.
- 'Link' buildings between Blocks A and B fronting Belmont Street (5 storeys), and B and C fronting the public footpath to the north of the site linking Belmont Street and Crogsland Road (4 storeys).
- Formation of green space within the central courtyard.
- Improvements to the footpath to the north of the site.

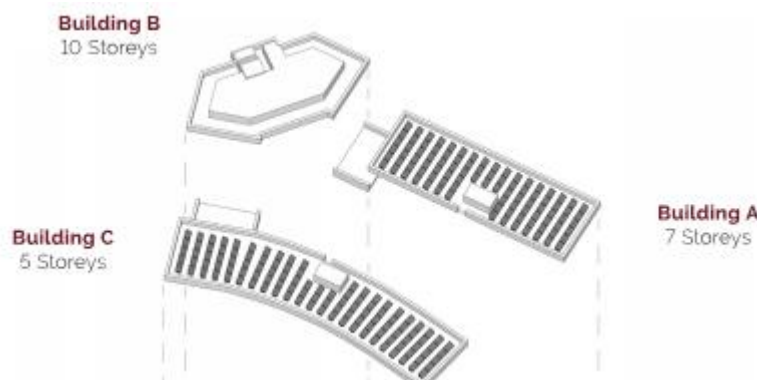
10.15 Throughout the pre-application process the scheme has undergone a number of iterations in response to comments by Officers and the Design Review Panel (DRP) to arrive at the current proposals for the site. At the third and final DRP the Panel commented:

- "The panel welcomes the revisions that have been made to the scheme in terms of scale, architecture and landscape design, and now broadly supports the proposals."
- "The design of the entrances could be more distinctive, and they could be widened to provide greater presence and views into the building."
- "The design of the courtyard and link element elevations would benefit from further thought, and are an opportunity for delight."
- "Balconies design on Building A could have curved edges to reflect those at the neighbouring Mead Close."
- "...where they [ground floor bedrooms] face Crogsland Road careful boundary treatment is required to separate them from the street."
- The privacy of ground floor spaces facing the courtyard could be improved by creating small private garden areas.

- “The lack of surveillance of the public route at ground floor level on the northern edge of the development is a concern. This route should be improved, potentially widened.”

10.16 Following this feedback the applicant’s design team have made further changes to the scheme. The main entrances have been made more generous in terms of extent, expression and views into and through the building. The courtyard and link elevations have been revised to provide more visual interest. Balconies on each of the Blocks have been given curved corners referencing similar details on the Ferdinand Estate. Thresholds to the ground floor flats where bedrooms face Crogsland Road have been given more defined boundary treatments. Where possible ground floor flats have been given small private garden areas within the courtyard. Surveillance to the northern public route has been improved. These elements are described in more detail below, however in summary Officers are satisfied that the design changes have provided a sufficient response to the DRP comments.

Layout



- 10.17 The proposed development is organised in a perimeter block form with Blocks A and C fronting Belmont St and Crogsland Rd, repairing the street frontage and with Block B providing definition and enclosure to the open space facing the Denton Estate properties. The perimeter block formation also forms a courtyard between the blocks as a communal open space for the residents.
- 10.18 Link blocks, at lower scale, between A and B and between B and C provide continuity and enclosure to the adjacent streets and spaces.
- 10.19 On the Crogsland Road frontage the building follows the curve of the road with a set back to the pavement providing a threshold to the ground floor units and their entrance doors. The Belmont Road frontage is similarly set back from the pavement with entrances to the ground floor units from the street. Communal entrances to the upper floors are via a main entrance to each of the blocks along their respective frontages. Circulation to the upper floors on A and C is via deck access within the courtyard which provides the added benefit of providing each of these units with a dual aspect and the possibility of cross ventilation.

- 10.20 The number of single aspect flats has been minimised to 7% of the total number of flats (i.e. 8 out of 115). Where these single aspects flats have been unavoidable, on the courtyard facing elevation of Block B, the layouts benefit from wide frontages and shallow plans to ensure adequate daylight/sunlight to all rooms with projecting balconies providing solar shading.
- 10.21 Access to Blocks A and C can also be gained via gates to the courtyard space from Belmont Street and Crogsland Road at the southern end of the site. Both Blocks A and C are pulled away from the southern-most boundary creating a visual link from Crogsland Road to the trees and open space in front of Hardington and vice versa to the trees and open space adjacent to the Charlie Ratchford Centre to enhance the perception of greenery and openness of the area.

Scale and massing

- 10.22 The disposition of massing across the site responds to the scale of buildings and spaces around the site. The 5 storey Block C, on Crogsland Road corresponds to the 5 storey element of the Charlie Ratchford Centre. The 7 storey Block A responds with the larger space between it and Hardington and its scale at 11 storeys. As stated above Block B provides enclosure and definition to space before it. At 10 storeys the building is the equivalent of the 11 storey height of Hardington thereby maintaining a sense of coherence of scale and townscape character within the immediate context.

Appearance and architectural detailing

- 10.23 The appearance, architectural detailing and materiality of Blocks A, B and C take their cues from the surrounding context with references to elements of the architectural expression of a number of buildings in the locality including the Ferdinand Estate, Hardington and the new Charlie Ratchford Centre thereby aiding the building's integration with their surroundings.
- 10.24 In summary the main elements of the design of Blocks A, B and C which define their character are:
- A palette of predominantly brick, the main brick type being a high quality multi stock consisting of cream, yellow and brown bricks and pale/neutral mortar. This is supplemented with accent bricks - white brick, white glazed brick and red glazed brick used to define and articulate proposed building features and details adding variety and richness to the facades. Along with colour, different types of brick courses are used to define different elements; for example, the building base, floor divisions, windows and the cornice at the top of the building.
 - Each of the blocks has a symmetrical arrangement of windows and balconies.
 - Either side of each of the communal entrances is given prominence, aiding legibility on the frontage by the distinctive use of red and white glazed bricks.

- Half projecting balconies which provide a degree of shelter to the outdoor space and add a sense of depth within the elevation. The curved corners act to soften the appearance of the façade.
- Decorative metal work to balcony balustrades.



Figure 05: View southwards on Crogsland Road (without trees).

10.25 In addition brick colour and patterning are used to provide a distinctive character to the link buildings and enliven their presence within the street scene.



Figure 06: View of link-building on Belmont Street.

- 10.26 Given that the design relies on the quality of materials and detailing, these would be conditioned, and architect retention clause sought as part of the S106 legal agreement, to ensure a building of the highest quality with a durable finish that weathers gracefully. The materials must also be appropriate within the context of surrounding heritage assets.
- 10.27 Notwithstanding the details shown on the plans and supporting documentation, further details of the materiality shall be carefully scrutinised via condition to ensure an appropriate finish.

Views

- 10.28 Eleven verified views were provided by the applicant to assess the townscape impact of the proposals, these are set out below:

View 1: *Belmont Street, close to the junction with Chalk Farm Road, looking north*



- 10.29 This view is located on the boundary of the Regent's Canal Conservation Area. It shows that the ten storey Block B would be visible. It would read as part of the background view commensurate in scale to Hardington. It is not considered that there would be any significant impact on the view or the setting of the locally listed buildings on the western side of Belmont Street in the mid-ground of the view.

View 2: *Regent's Park Road, close to the junction with Chalk Farm Road, looking north onto Crogsland Road*



- 10.30 In this view the block facing Crogsland Road provides enclosure to and a sense of continuity of the street. The taller ten storey block is set behind the Crogsland Street frontage building and would be a scale that fits comfortably within its surrounding townscape.

View 3: *Prince of Wales Road, looking south on Crogsland Road*



- 10.31 The existing view of the shoulder and apex of the Grade II* listed Roundhouse is reduced to a view of the apex, however the Roundhouse remains recognisable in the view maintaining its value as a local landmark. The view demonstrates that scale of the proposed block on Crogsland Road is appropriate to its surroundings.

View 4: *Prince of Wales Road, at Kentish Town West Station, looking south west*



10.32 There is no significant encroachment on the character of the townscape in this view which is largely screened by trees, even in this winter view.

View 5: *Haverstock Hill, west of Steeles Road, looking east*



10.33 This view is from within the Eton Conservation Area. Similarly to the previous view there is no significant impact on the townscape.

View 6: Provost Road, looking east



- 10.34 The viewpoint is from just west of the Grade II listed Church of St Saviour on the north side of Provost Road, at the heart of the Eton Conservation Area. There is no impact on this view.

View 7: Regent's Park Road, looking north east



- 10.35 This view is from within the Primrose Hill Conservation Area, looking north-east towards the site. Much of the view is obscured by trees. Denton is visible in the background. There is no significant impact on this view.

View 8: *Castle Road, close to Grafton Crescent, looking west*



10.36 There would be no impact on this view.

View 9: *Denton Estate, looking south west*



10.37 This winter view formed as a triptych to situate the building in its context, demonstrates the increased definition and enclosure given to this open space within the Denton estate. Block B is of commensurate height to Hardington (visible to the left) allowing the building to read as part of a coherent range of scales with in the local townscape.

10.38 The below summer view demonstrates the moderating effect on the sense of scale the existing trees would have.

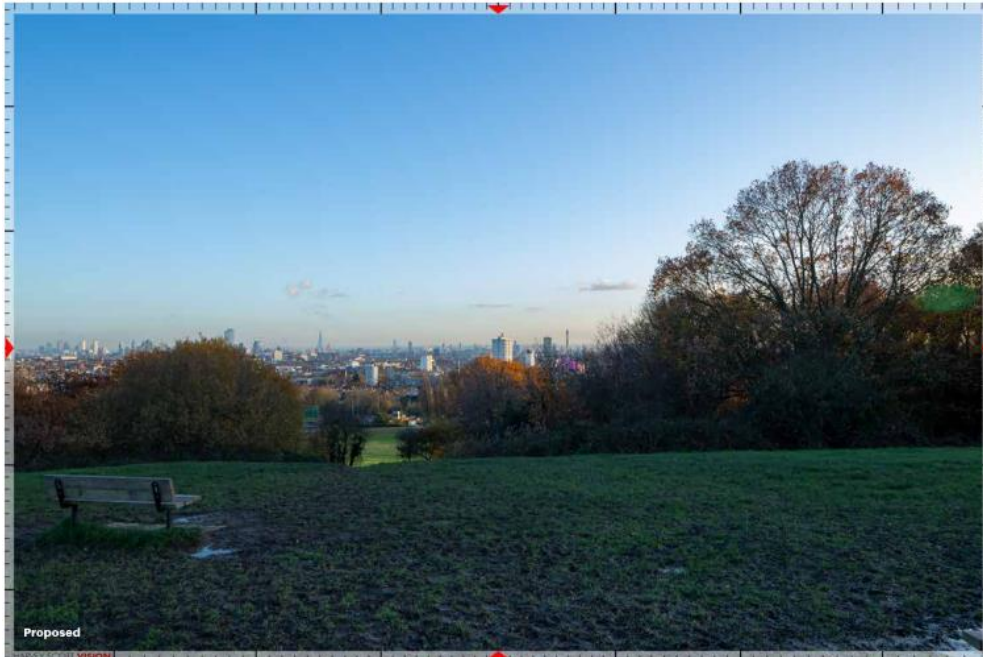


View 10: Crogsland Road, looking north east



10.39 This winter view demonstrates the effect of Block C in providing enclosure to Crogsland Road and the accentuation the curved frontage of the building gives to the curve in the road.

View 11: Parliament Hill, The Summit



10.40 There is no impact on the protected view.

View conclusions

10.41 The views provided demonstrate that there is no significant impact on views from around the site. Where views are close to the site, the proposals generally provide an improvement to those views through the appropriate sense of enclosure to weakly defined spaces and as a result of the quality of the architecture and its contextual response. The setting of the nearby listed Roundhouse is dealt with in the heritage section below.

Formation of courtyard and greening

10.42 The courtyard facing elevations maintain the same level of brick detail to the street side elevations with the addition of the access decks with metal handrails.

10.43 Where possible ground floor flats have been given private spaces to the rear of the flats. The central part of the courtyard has been designed to exploit the difference in ground levels between the rear of Blocks A and C of 0.9m providing play areas, seating and naturalistic planting.

10.44 The stair cores which also occupy the courtyard provide an opportunity for vertical greening of the courtyard adding to its visual amenity and biodiversity value. The stair cores here have been used to provide an interesting architectural feature and centre points within the courtyard landscaping.

Improvements to the northern public footpath

10.45 The northern footpath is improved by being made straighter and wider at 3.3m to improve visibility. Surveillance to the path is also improved by greater activity with the entrance to Block B and a bike store entrance along with overlooking

windows and balconies. Planting provides a buffer to the edge of the building while improving its attractiveness.

Heritage assets

- 10.46 As noted within the introduction to this section, the site itself is not a heritage asset, nor is it located within a conservation area. However the proposal would impact on the setting of the Grade II* listed Roundhouse in views southwards along Crogsland Road. It would also impact on the setting of the Grade II listed buildings on the southern side of Prince of Wales Road (Nos.131-149) as shown below:



View southwards from Prince of Wales Road down Crogsland Road. Note the Grade II* Roundhouse towards the centre of the image, and Grade II listed terrace on Prince of Wales Road to the right of the image.

- 10.47 The proposal would also be visible in the setting of the following locally listed buildings:

- 4-11 Belmont Street;
- 2 Haverstock Hill; and
- 1-11 Crogsland Road.

Views

10.48 The site is within the Strategic view wider setting (view from Parliament Hill to Palace of Westminster) area. However, the height of the proposal means it would not impact on this view – see view section above.

10.49 There are no other designated views in the area. However, local views include:

- North and southwards along Crogsland Road; and
- North and southwards along Belmont Street.

Impact on the heritage assets

10.50 The Roundhouse is Grade II* listed and is therefore an identified heritage asset. The nearby locally listed buildings and listed terrace on Prince of Wales Road are similarly identified heritage assets. Whilst conservation areas exist to the north and south of the site (over 100m away), the proposal is considered not to impact on the setting of these conservation areas.

10.51 In considering developments affecting listed buildings or their setting, Sections 16 (under listed building consent applications) and 66 (under planning applications) require local planning authorities to have special regard to the desirability of preserving the buildings and their setting, as well as any features of special architectural or historic interest they possess.

10.52 The view of the Roundhouse southwards along Crogsland Road shown in the photograph and CGI above, demonstrate that there would be some loss of views. However, from the position shown, the profile of the roof can still be seen. It is worth noting that there was a historic terrace in this location that would have obscured part of this view and it is only following bomb damage in WW2 that it became more visible – this scheme reinstates the historic pattern of development following the street albeit with a larger form. It should also be noted that the views of the Roundhouse along Crogsland Road are experienced differently as one walks along the road and the view itself is not particularly significant to its setting.

10.53 Given the above assessment, it is considered that the redevelopment of the site would not harm the setting of the Grade II* listed Roundhouse in views southwards along Crogsland Road. The development is considered not to result in harm to the character or special interest of the other identified heritage assets (namely, the Grade II listed properties at nos.131-149 Prince of Wales Road, aforementioned locally listed buildings, or aforementioned conservation areas).

Conclusion

- 10.54 It is considered that the proposals provide the optimum development of the site in terms of the appropriateness of the layout, scale and appearance to the immediate context whilst at the same time delivering 115 good quality homes. The proposals are considered to represent high quality design using good quality and durable materials. Conditions shall be attached to ensure the high quality material finish presented here is delivered on site.
- 10.55 Given the above, the proposal is considered to comply with policies D1 and D2 of the Camden Local Plan (2017), the NPPF (2019), the London Plan (2021)

11 HOUSING MIX, UNIT SIZE, AND AFFORDABLE HOUSING

- 11.1 The considerations with regards to tenure and unit size and mix are as follows:
- Policy review
 - Amount of housing provided
 - Affordable housing and housing credit
 - Mix of unit sizes
 - Interest from registered providers (RPs)

Policy review

- 11.2 The Local Plan has a range of policies relating to targets for the overall number of additional homes and additional affordable homes that are expected to be built within the Borough. These include policies H1, H2, H3, H4, H5, H6, H7 and CPG Housing are relevant with regards to new housing, including to tenure and unit size.
- 11.3 Policy H4 (Delivering affordable housing) of the Local Plan states that the strategic target is for 50% of all new homes delivered across London to be genuinely affordable.

Amount of housing provided

- 11.4 Policy H1 focuses on maximising Camden's supply of housing. The Council will aim to secure a sufficient supply of homes to meet the needs of existing and future households by maximising the supply of housing and exceeding a target of 16,800 additional homes from 2016/17 - 2030/31, including 11,130 additional self-contained homes. The policy regards housing as Camden's priority land use.
- 11.5 Subsection (c) of policy H1 notes that the Council will resist alternative development of sites identified for housing. This site is also highlighted within the Site Allocations Plan (Draft, March 2020), as an individual site for the provision of 124 flats (site ref: IDS20m).
- 11.6 Policy H1, subsection (d) notes that where sites are underused or vacant (as is the instance here), the Council will expect the maximum reasonable provision of housing that is compatible with any other users needed on the site.

- 11.7 Proposed is 9,226sqm (GIA) of on-site residential accommodation. This would comprise 115 flats with a mix of studios, 1, 2 and 3 bed units. The units would be housed in 3 blocks across the site (Blocks A, B and C), at 5, 7 and 10 storeys fronting on to Crogsland Road and Belmont Street. This would provide a mix of affordable and market units, with 89 market flats (36 x studios, 29 x 1 beds, and 24 x 2 beds), and 26 affordable flats (11 x 1 beds, 12 x 2 beds, and 3 x 3 beds) – totalling 115 flats provided as a result of the development.
- 11.8 Whilst the number of units does not achieve the desired 124 flats as outlined within the Site Allocations Plan (Draft, March 2020) (site ref: IDS20m), it is considered to maximise the potential of the site when considering design, amenity and other factors. The proposal would provide a large number of residential flats, significantly contributing to Camden's housing stock, with 50% affordable housing in a largely residential area. The amount of housing provided in this instance is therefore considered to be acceptable.

Affordable housing and housing credit

- 11.9 Planning permission was previously granted on the adjacent site on Crogsland Road to provide the extra-care and day centre (ref: 2015/0921/P dated 07/07/2016). The development description of the consent was:

'Redevelopment of a vacant site by the erection of a 6 storey building comprising a day centre (Class D1) on the ground floor and 38 extra-care residential flats (Class C3) on the upper floors, plus roof terraces, communal gardens and minibs parking'

The 2016 approval is linked to the redevelopment of the CRRC site proposed under the current application. The Council is able to take into account the floorspace already provided as extra care facility as an affordable housing 'credit'.

- 11.10 The objective of the joined up approach was to support the up front and early delivery of much needed and improved affordable extra-care accommodation as a key planning benefit, while enabling both the extra care and CRRC sites to be developed sequentially and in a timely manner.
- 11.11 As previously established, the construction of the extra-care centre is now complete, with the site handed over to the Council on 24/11/2020 and occupation expected April 2021.
- 11.12 Given the provision of the extra-care centre, the 2015/0921/P consent offers an affordable housing credit which is linked to the CRRC site. The credit totals 3,568sqm (GIA) floorspace to be carried across to the CRRC site.
- 11.13 In order to achieve 50% affordable housing provision across the combined sites and deliver on the policy requirements of the Local Plan and London Plan, 2,146.8sqm of affordable floorspace is required as part of the CRRC redevelopment proposed under this scheme. Combined with the 3,568sqm at

the Crogsland Road site (the affordable housing credit), a total of 5,714.8 sqm of affordable floorspace would be provided across the two sites.

11.14 All of the 3,568sqm residential floorspace at the new extra-care scheme on Crogsland Road qualifies as social-affordable rented accommodation in line with the Council's definition.

11.15 This definition notes that these affordable housing units will be available for rent in perpetuity and are managed by a Registered Provider (RP). Therefore, to meet the Council's required affordable housing tenure split of 60:40 (affordable: intermediate), it is proposed that the majority of the affordable housing element on the CRRC site would be provided as intermediate housing, with 3 x 3 bed 5 person units provided as social rent.

11.16 Figure 07 below shows the method of calculation for the affordable housing across the extra-care and CRRC sites:

A. Proposed development floorspace at the Site	7,861.6 sqm
B. Affordable Housing Credit floorspace	3,568 sqm
A + B = Total combined floorspace	11,429.6 sqm
50% of Total combined floorspace	5,714.8 sqm
50% of Total combined floorspace less Affordable Housing Credit	2,146.8 sqm
Total affordable housing requirement at the site	2,146.8 sqm

Figure 07: Method of calculation for the affordable housing across the extra-care and CRRC sites.

11.17 The 2,146.8 sqm of affordable housing floorspace required from the current proposal on the CRRC, resulting in 26 affordable homes. A summary of tenure and mix is provided in Figure 08 below:

Residential	London Affordable Rent	Intermediate Rent	Total Affordable Housing
Studio	0	1	1
1 Bed (1b/2p)	0	10	10
2 Bed (2b/3p)	0	6	6
2 Bed (2b/4)	0	6	6
3 Bed (3b/5p/6p)	3	0	3
Total	3	23	26

Figure 08: Affordable housing tenure and mix.

11.18 The intermediate affordable units would be contained primarily within the upper floors of Block B, with the 3 bed social rented units within Blocks A and C. The 3 bed units would also be fully wheelchair accessible. The locations of the affordable houses are indicated in Figure 09 below.



Figure 09: Affordable housing location - affordable rent (the 3 x 3 bed units) shown in purple, and 23 intermediate rent units in green.

11.19 Given the above assessment, the provision of 2146.8sqm on this site, in addition to the affordable housing credit of 3,568sqm linked to the previously approved (now built-out) extra-care centre at the Crogsland Road site (ref: 2015/0921/P 07/07/2016), means a total of 5,714.8 sqm of affordable floorspace would be provided across the two sites. With a total floorspace provided across the two sites of 11,429.6sqm, this represents 50% affordable housing floorspace provision across the sites in compliance with relevant policies.

11.20 As a policy compliant 50% affordable housing provision would be made as a result of the scheme, there is no requirement for an additional payment-in-lieu or review mechanism.

Mix of unit sizes

11.21 Policy H7 requires homes of different sizes. The proposed unit mix should broadly accord with the Dwelling Size Priorities Table within policy H7, although the Council will be flexible when assessing development.

11.22 89 market flats, and 26 affordable flats (115 total) would be provided. A summary of tenure and mix is provided in Figure 10 below:

Residential	Total Affordable Housing	Market Housing	Total provision	Percentage total provision
Studio	1	36	37	32%
1 Bed (1b/2p)	10	29	39	34%
2 Bed (2b/3p)	6	8	14	12%
2 Bed (2b/4)	6	16	22	19%
3 Bed (3b/5p/6p)	3	0	3	3%
Total	26	89	115	100%

Figure 10: Market and affordable housing tenure and mix.

- 11.23 The Dwelling Size Priorities Table within policy H7 notes that for affordable (social rented) units, 2 and 3 bed flats are within high demand, and for intermediate 1 bed units are also in high demand with 2 bed units being in medium demand. It further notes that 2 and 3 bed market flats are in higher demand, with lower priority given to studios, 1 beds, and 4 bed (plus) homes.
- 11.24 It continues to note that the Council will take a flexible approach to assessing the mix of dwelling sizes proposed in each development having regard to:
- c. the different dwelling size priorities for social-affordable rented, intermediate and market homes;
 - d. any evidence of local needs that differ from borough wide priorities;
 - e. the character of the development, the site and the area, including the impact of the mix on child density;
 - f. site size, and any constraints on developing the site for a mix of homes of different sizes;
 - g. the economics and financial viability of the development including any particular costs associated with it, having regard to any distinctive viability characteristics of particular sectors such as build-to-let housing; and
 - h. the extent to which flexibility around the mix of market homes could secure the delivery of additional affordable housing.
- 11.25 Policy H7 allows for flexibility around dwelling sizes in order to achieve a rational layout and to satisfy amenity concerns and advises that the Council will take a flexible approach to assessing the mix of dwelling sizes and states that “we will expect proposals to include some dwellings that meet the high priorities wherever it is practical to do so.”
- 11.26 The London Plan (2021) policy H10 (Housing size mix) states that schemes should generally consist of a range of unit sizes. To determine the appropriate mix of unit sizes in relation to the number of bedrooms for a scheme, applicants and decision-makers should have regard to:
- 1. robust local evidence of need where available or, where this is not available, the range of housing need and demand identified by the 2017 London Strategic Housing Market Assessment;
 - 2. the requirement to deliver mixed and inclusive neighbourhoods;
 - 3. the need to deliver a range of unit types at different price points across London;

4. the mix of uses in the scheme;
5. the range of tenures in the scheme;
6. the nature and location of the site, with a higher proportion of one and two bed units generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity;
7. the aim to optimise housing potential on sites;
8. the ability of new development to reduce pressure on conversion, subdivision and amalgamation of existing stock; and
9. the role of one and two bed units in freeing up family housing.

11.27 Supporting text to policy H10 notes that well-designed one and two-bedroom units in suitable locations can attract those wanting to downsize from their existing homes, and this ability to free up existing family stock should be considered when assessing the unit mix of a new build development and that one-bedroom units play an important role in meeting housing need, and provision in new developments can help reduce the pressure to convert and subdivide existing larger homes. However, one-person and one-bed units are the least flexible unit type so schemes should generally consist of a range of unit sizes.

11.28 Whilst the market tenure mix is not strictly in compliance with the aforementioned policies, the affordable mix has been led by identified need working in conjunction with the Housing Commissioning and Partnerships Team. It provides a policy compliant tenure split of affordable housing (60:40), and the provision of 3 bed London Affordable Rent units which are wheelchair accessible. In addition, the development of this site cross subsidises the extra care housing already delivered on the site opposite on Crogsland Road, which has already been built out. It is important to stress that the scheme proposes 50% affordable housing across the two sites, which is fully compliant with the Council's target. Policy H7 in the local plan allows that a greater flexibility be provided to market mix in circumstances where it secures the delivery of affordable housing. Consequently, officers have accepted greater proportion of smaller units in the private tenure mix on this site.

11.29 The supporting text of Local Plan Policy H7 also states that in accepting flexibility in mix of unit sizes, consideration should be given to securing mixed and balanced communities. The table above (figure 10) shows that 19% of overall mix includes 2-bed units that are of a suitable for four person occupancy that may also be occupied by small families.

11.30 Whilst no private tenure 3-bed units are proposed, it is likely that residential values in the area are such that these larger 3-bed units are less likely to be attractive to most families and are more likely to be used by sharers. This position is echoed in the sales expert opinion expressed below.

11.31 In support of the private mix proposed, Vistry has also submitted information from residential sales experts and estate agents. The information suggests that there is low demand for 3-bed housing in this location. The information also suggests a lack of interest from families demanding a 3 bedroom unit within a

flatted block. These properties are more typically sold to landlords renting the units to sharers or on a short term let basis (with the associated impacts).

- 11.32 The information suggests that within the Camden Town Area, which offers a wide range of cultural and night time activities, the provision of smaller sized units is also more suited to younger, first time buyers, rather than families looking to settle. The provision of studio, 1 bedroom and 2-bedroom units within the private component is considered to be appropriate given the characteristics of the site and surrounding context. These are opinions of sales experts and the conclusions have not been independently assessed.
- 11.33 Finally, it is worth noting that the overall housing offer of 115 flats is able to be achieved by incorporating a larger number of smaller unit sizes in the market offer. The site is expected to provide 124 homes in compliance with the 2020 Draft Site Allocations Document (site ref: IDS20m). As such, any increase in the size of market flats would result in a reduction in the number of units being offered which already falls below the 124 flats outlined within the Draft SALP. It is noted that the scale of the proposed development is felt to optimise the development of the site on townscape and amenity terms and could not reasonably be increased to provide a greater number of units.
- 11.34 In conclusion, the proposed flats are a good quality (see section 12 of this report), and present an attractive offer to RPs (see relevant subsection below). The scheme would contribute a significant number of properties (115 flats) to the Council's housing supply. The Council's Housing Delivery Test Action Plan shows that between 2016/17 and 2018/19 Camden had a target of 3,360 new homes, and 2,924 were delivered (equating to 87%). This should be taken into account when the Council are making decisions on applications which if approved would enable the delivery of additional housing for the borough. The applicant has submitted information arguing that there is lower demand for the provision of 3 bed flats in this particular area, and there are viability concerns with providing further larger units (in addition to the overall number of flats being reduced). Whilst the unit mix does not completely align with the aforementioned policies, considering the flexibility in the application of the policy, the local context, the specific tenure mix, and number of benefits in terms of housing provision and affordable housing provision, on balance, the mix in this instance is on balance considered to be acceptable and refusal is not warranted on this basis.

Interest from registered providers (RPs)

- 11.35 In order to assess the potential level of Registered Provider (RP) interest in this Section 106 affordable housing opportunity, the applicant undertook an informal marketing process of the scheme. Vistry approached One Housing, Newlon, L&Q and Camden Living.
- 11.36 It is considered that the proposed affordable housing (26 flats) would represent an attractive offer to RPs which has been backed by the above process. The applicant shall continue to work with the Council's Affordable Housing Team

and approved RPs. The housing block would represent an attractive offer to a number of RPs and is acceptable in this regard.

12 QUALITY OF ACCOMMODATION

- 12.1 The considerations with regards to the amenity of the proposed housing are as follows:
- Policy review
 - Design and layout
 - Daylight/sunlight
 - Outlook
 - Privacy
 - Noise and vibration
 - External amenity space
 - Conclusion

Policy review

- 12.2 London Plan policy D6 and Camden Local Plan policy H6 are relevant with regards to the amenity of proposed housing. Policy H6 notes that the Council will seek to secure high quality accessible homes in all developments that include housing, development is expected to meet the nationally described space standard.

Design and layout

- 12.3 The proposed residential units have been designed to a high standard that meet the requirements set out in the development plan (including Council and London Plan standards).
- 12.4 The proposed units would conform to the minimum space standards set out in Table 3.1 of the London Plan (see below) and CPG Housing. Policy D6 of the London Plan further recognises that a genuine choice of homes should be provided in terms of both tenure and size and provision should also be made for affordable family housing, wheelchair accessible housing and ensuring all new housing is built to Building Regulations Part M.

Number of bedrooms	Number of bed spaces	Minimum GIA (m2)			Built-in storage (m2)
		1 storey dwellings	2 storey dwellings	3 storey dwellings	
1b	1p	39 (37)*			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	

Figure 11: Minimum space standards for new dwellings.

- 12.5 All of the proposed units meet Camden's floorspace standards both in terms of overall size and bedroom size.

Daylight/sunlight

- 12.6 Maximising the provision of dual aspect homes has many inherent benefits including better daylight, a greater chance of direct sunlight for longer periods, natural cross-ventilation, a greater capacity to address overheating and a choice of views. With this in mind, the applicant has managed to achieve 93% dual-aspect units across the site. Where a small number of single-aspect units exist (7%, or 8 of the 115 units), these have been designed with wide frontages and shallow plans to maximise daylight/sunlight into the rooms. The single aspect units would be located on the south-western (courtyard facing) elevation of Block B at first to fourth floors (two on each floor). A daylight/sunlight report was submitted with the application to demonstrate an acceptable level of daylight/sunlight is achieved in each of the 115 proposed residential units.
- 12.7 It is acknowledged in assessing this that most properties have generous balconies, which, whilst providing good quality private amenity space, do impact on the overall light levels achieved within the properties.

Daylight

- 12.8 All relevant rooms within the scheme have been technically assessed for daylight quantum, expressed as Average Daylight Factor (ADF), and distribution, expressed as No Sky Line (NSL) and Room Depth Criterion (RDC).
- Of the 235 rooms tested, 73% (172) of habitable rooms meet or exceed the recommendations for daylight quantity (ADF);
 - 78% (184) of habitable rooms achieve sky visibility (NSL) in line with or above guidance; and,
 - All rooms have been designed with good proportions for uniform daylight distribution in accordance with BRE's RDC, where applicable.

- 12.9 Of the 63 rooms which transgressed the ADF guidance, six of these rooms form living/kitchen/diners which, whilst falling slightly short of the 2% ADF recommended for rooms including a kitchen, would all meet or exceed the minimum recommendation for living rooms of 1.5% ADF, and can be therefore considered acceptably daylit living areas.
- 12.10 Of the remaining 57 rooms below guidance for ADF, 21 are living rooms, six are living/kitchen/dining rooms and 30 are bedrooms.
- 12.11 Of the 21 living rooms and living/kitchen/dining rooms the majority (18) fall only marginally short of the 1.5% recommended for living areas (with levels between 1.2% and 1.5%). In addition, 15 of these 27 rooms would see levels of annual sunlight in line with, or above guidance, and thus would appear much brighter on sunny days (see sunlight section below).
- 12.12 The remaining 30 rooms are all bedrooms, which have been located where the daylight availability is lower to prioritise the main living spaces. Those falling short of the daylight recommendation (30 out of 120) predominantly do so owing to being located behind a recessed balcony or on one of the lowest storeys where the obstruction is greatest.
- 12.13 Overall, the properties are therefore considered to provide a good quality of daylight for future occupiers.

Sunlight

- 12.14 In order to assess levels of sunlight in compliance with BRE guidance, Annual Probable Sunlight Hours (APSH) and Winter Probable Sunlight Hours (WPSH) assessments have been undertaken for all living room windows facing within 90 degrees of due south.
- 12.15 86% would see levels above the BRE minimum recommended throughout the year, and 95% would do so during winter months. These show high levels of compliance, with the transgressions at lower floor levels (one to four) as would be expected. Given the high level of compliance, constraints of the site, and flexible application of the BRE guidance, the proposal is considered to be acceptable in regards to sunlight for future occupiers.

Courtyard communal amenity space

- 12.16 The sunlight access of the communal amenity area provided at ground level has been assessed by means of Sun Hours on Ground. BRE recommends that for an open space to be well sunlit throughout the year, at least 50% of its area should see two or more hours of sunlight on the equinox. Sun exposure assessments have also been undertaken for the equinox and summer solstice in order to provide a better understanding of the sunlight availability throughout the year.
- 12.17 55% would see two or more hours of direct sunlight on 21st March (equinox), and so it can be considered well sunlit in compliance with BRE guidance. The

majority would see at least one hour of sunlight at this time, particularly towards the southern edge of the site, as would be expected.

- 12.18 In summer months, it is expected that up to six hours of sunlight would be achieved, particularly to the southern part of the site, with more shaded areas towards the north of the courtyard.
- 12.19 Overall, considering the constraints of the site and flexible approach to adopting BRE guidance, the proposed units and communal courtyard garden are considered to achieve good levels of daylight and sunlight for future occupiers.

Outlook

- 12.20 The properties facing on to Belmont Street would have a good level of outlook, with a 23.2m separation distance between the front elevation of Block A and the front elevation of Hardington (opposite). There would be a small pinch point of 16m between Block B and the closest neighbouring property, but this would still achieve a considerable level of outlook. The remainder of Block B would have a separation distance of over 30m facing towards the Denton Estate. There would be a pinch point to the northern elevation of Block A (overlooking the public footpath) of 6.1m; these flats however are either dual or triple aspect, and the flats would offer a good level of outlook to the Crogsland Road facing (western) elevation. The properties facing on to Crogsland Road would have a separation of approximately 18.6m to the front elevation of the newly constructed extra-care centre across the street. See Figure 12 below.

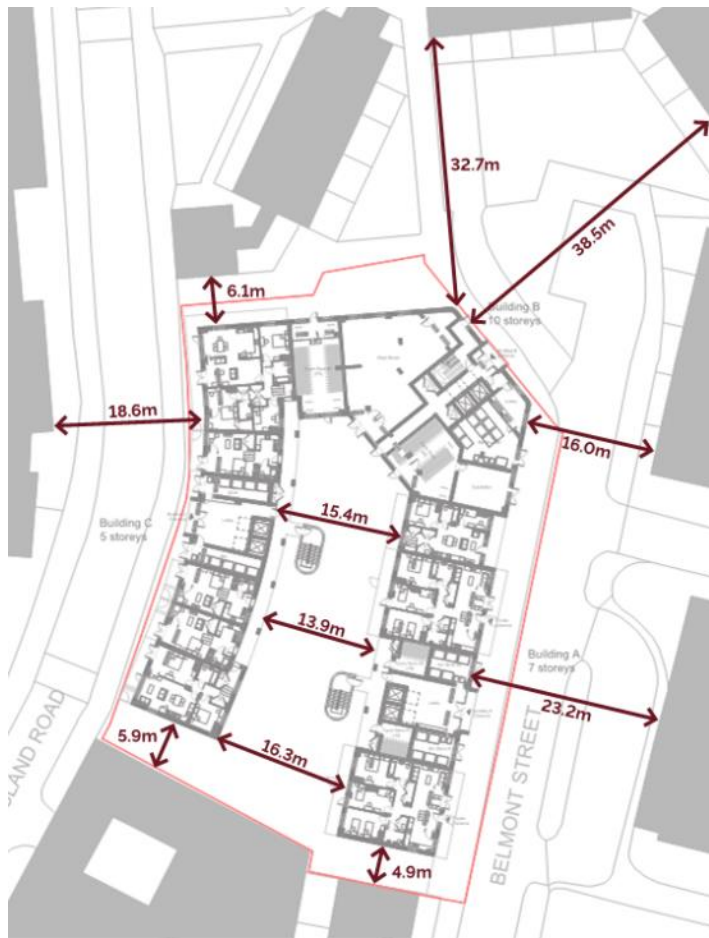


Figure 12: Separation distance to neighbours.

- 12.21 Separation distances facing into the courtyard area would be more constrained at between approximately 15.4m and 16.3m (excluding the deck); however these are still considered to be acceptable in order to provide a good level of outlook, having regard to the external deck access arrangement. It is additionally noted that the proposal is largely dual aspect, further enhancing outlook. Where a minority of single aspect units would arise (7% of the total, or 8 of the 115 units), these would be contained within the south-western elevation of Block B, giving views southwards across the length of the communal courtyard.
- 12.22 The proposal is considered to give a good level of outlook to future occupiers of the development and is acceptable in this regard.

Privacy

- 12.23 Whilst there would inevitably be an element of overlooking between the proposed flats, the instances where the 18m separation is breached is between the access decks, which is considered acceptable to optimise development of the site. Adequate separation distances have been maintained between living area windows both within the development and considering surrounding developments on Belmont Street and Crossland Road.

- 12.24 Privacy has been considered as part of the design process, and noting the density and constraints of the site, the proposal would offer a good level of privacy for future occupiers.

Noise and vibration

- 12.25 Whilst close to Chalk Farm Road, the proposed residential units would be in a largely residential area. The properties, particularly on Belmont Street would face residential units on a low trafficked street, whilst the Crogsland Road flats would face the extra-care centre, albeit on a busier street. Directly to the south of the site lies 54-66 Crogsland Road, which is an operational fish curing plant.
- 12.26 Policy D13 of the London Plan places the responsibility for mitigating impacts from existing noise generating activities or uses on the proposed new noise sensitive development rather than the business or activity making the noise which is how it traditionally has been. This policy has arisen in response to newly arrived residents to an area complaining about noise from existing businesses, resulting in the closure of pubs, clubs and other noise generating uses.
- 12.27 In this instance, the new residential units would be located in close proximity to 54-66 Crogsland Road, containing an operational fish curing plant. The proposal should therefore mitigate any noise as a result of the existing and operational fish curing plant.
- 12.28 The design stage is the best place to incorporate Agent of Change principles into the scheme, particularly as it is new-build. It is acknowledged that residential properties exist within close proximity of the fish curing warehouse at present. The proposal would have high quality and high performance double glazing and when closed, noise levels are considered to be acceptable. A condition would ensure that noise mitigation measures are provided from the outset.
- 12.29 Furthermore, the S106 shall include a Head of Term that requires the Council's Housing Allocations officer to make clear to prospective tenants that the dwelling is located in an urban environment with particular noise conditions, including existing warehousing, and mitigation measures should therefore be utilised and retained.
- 12.30 A Noise Impact Assessment was submitted with the application to demonstrate whether the site is suitable for residential development in compliance with guidance internal and external noise levels outlined in both BS8233:2014 and WHO Guidelines for Community Noise as well as the requirements of the Local Authority.
- 12.31 The results of the assessment of noise in external amenity areas indicate that noise levels in the proposed external courtyard area are likely to fall below the proposed criteria although it would be screened from traffic noise by the proposed buildings. Noise levels in the proposed balconies are likely to exceed the proposed criteria, however, this is considered acceptable as they

provide external space for occupants and the flats themselves would meet noise standards.

- 12.32 Subject to the attached conditions and clause Head of Term within the S106 with respect to the Agent of Change principle for the existing fish curing plant, the proposal is considered to be acceptable with respect to noise and vibration.

External amenity space

- 12.33 Each unit would have access to good quality external amenity space in the form of a private balcony. The London Plan requires a minimum of 5 sq. m of private outdoor space to be provided for 1-2 person dwellings with an extra 1sq. m should be provided for each additional occupant. The Camden Local Plan and CPG are not so prescriptive in respect of private amenity space.
- 12.34 The proposed terraces would largely comply with the London Plan standards, with each unit having direct access to good quality private amenity space. Residents would also have access to the central courtyard, which has high quality landscaping and dedicated play space. In total the development would provide 937sqm of private amenity floorspace across the 115 flats, and 772sqm of communal amenity space in the courtyard.
- 12.35 Given these factors, the proposal is considered to provide a good quality of both private and communal external amenity space.

Conclusion

- 12.36 Given the above assessment, and subject to the attached conditions, the proposal is considered to provide a good quality of accommodation for future occupiers.

13 OPEN SPACE, LANDSCAPING, TREES AND NATURE CONSERVATION AND BIODIVERSITY

Introduction

- 13.1 The existing site contains the single storey CRRC with the entrance on Belmont Street. A retaining wall fronting Crogsland Road means there is no activation on this western frontage. Greenery is contained towards the southern end of the site, which is partly laid to lawn with planters and some semi-mature and mature planting. There is some limited planting around the remainder of the building perimeter which is largely set to impermeable concrete.
- 13.2 Five trees exist on the site, as well as four trees on the Crogsland Road frontage. The trees are of various quality as discussed in the relevant 'trees' section below. Mature trees line the eastern side of Belmont Street between the CRRC and nearby Hardington building.
- 13.3 In short, the landscaping proposals comprise:

- Removal of existing walls and addressing the level change;
- Formation of active private terraces with planting;
- Planting and trees added to improve the public footpath to the north of the site;
- Removal of five trees of varying quality, and replacement planting of seven publically visible trees, and a further ten trees within the courtyard (a net gain of 12 trees on site)
- Improve biodiversity through planting and the provision of bird boxes;
- Provision of a landscaped central residents communal courtyard;
- Street-tree planting on Belmont Street (an additional two trees) as well as tree planting within the public footpath to the north of the site;
- Play space provision for under 10 year olds within the central courtyard;
- A PIL contribution towards play space for 10-16 year olds as requested by the GLA; and
- Full hard/soft landscaping details and details of trees to be secured by condition.

Public Open Space

- 13.4 Local Plan policy A2 seeks public open space provisions for major applications. The policy applies a standard requirement of 9sqm of public open space per occupant for residential schemes. When assessing the occupancy of developments, it is acknowledged that occupation is generally less than the total number of bedspaces may allow. Consequently, occupation for the purposes of this assessment is calculated on the basis of the yield for the ward which is contained within Appendix E of CPG Public Open Space. In this instance, the site is within the Haverstock ward which yields an average household size of 2.3 people.
- 13.5 Proposed are 115 residential units across Blocks A, B and C. The Council would seek the number of proposed flats (115) multiplied by the number of average occupants per dwelling (2.3), multiplied by 9sqm of public open space provision requirement per occupant. This results in a requirement of 2,381sqm of public open space for this development.
- 13.6 Whilst good quality external amenity space for each flat, and a communal garden for residents have been provided, no public open space provision has been made as part of the application.
- 13.7 Due to the constraints of the site, it is accepted that the 2,381sqm of open space could not be reasonably accommodated on site. As such, in compliance with policy A2 and CPG Public Open Space, a pro-rata financial contribution towards improving the quality and capacity of existing public open space as a payment in lieu (PIL) of provision shall be sought.
- 13.8 In compliance with CPG Public open space, the contribution would comprise of capital costs and on-going maintenance costs (at £200 per sqm and £70 per sqm respectively):

- Capital costs = 2,381sq. m x £200 per sq. m = £476,200
- Maintenance costs = 2,381sq. m x £7 per sq. m pa x 10 years = £166,670
- Total = £476,200 (capital costs) + £166,670 (maintenance costs) = £642,870

13.9 The above sum shall be secured via S106 legal agreement.

Landscaping

13.10 Soft landscaping would be introduced primarily within the central courtyard and towards the southern end of the site, but also on the Belmont Street and Crogsland Road elevations and to the northern edge within the public footpath. See Landscape Masterplan at Figure 13 below:



Figure 13: Landscape Masterplan.

13.11 Ground floor residents would have direct access from their homes to the communal courtyard, with upper floor residents gaining access via their respective lobby. The courtyard utilises the sloping topography and has been

broken up to form a series of 'rooms' with generous planting and an area for play for under 10 year olds. The southern end is generously planted and allows glimpses from Belmont Street to Crogsland Road. Trees within the courtyard would be light-canopied and a minimum of 3.5m in height. Planting would have a woodland understory palette, with biodiverse rich, native species planting creating a long seasonal interest (with 50% evergreen and deciduous planting). The stair cores would be used as architectural features within the landscaping, helping to frame the space, and encourage climbing plants. A muted natural tone would be used for the areas of hard landscaping, with all paving being permeable.

- 13.12 Whilst play provision is made for under 10 year olds, the GLA commented that provision has not been made for those aged 10-16. The GLA has requested a PIL towards such provision. This would be covered by the contribution towards public open space and this sum shall be secured by S106 legal agreement.
- 13.13 The proposal would have an Urban Greening Factor (UGF) score of 0.35 which falls marginally short of the London Plan policy G5 target UGF score of 0.4 for primarily residential development. However given the constraints of the site, extent and quality of landscaping proposed, provision of street trees and incorporation of green roofs (see relevant section of this report), the proposal is considered to maximise greening and, on balance, this is considered to be acceptable.
- 13.14 The public footpath to the north of the site currently dog-legs and forms an unattractive environment. It is proposed to straighten the path (width of 3.3m), increasing inter-visibility between Crogsland Road and Belmont Street, and to include areas of raised planting. Notwithstanding the details shown on the plans, further trees would be provided in this footpath area than shown, full details of this would be achieved by planning condition. In addition to the passive overlooking as a result of the proposed development, the result would be a more attractive and welcoming walking environment on this northern boundary of the site.
- 13.15 2 new street trees would be planted on Crogsland Road, with additional street trees planted on the northern footpath (in addition to the raised planters). Full details to be secured by condition and S106. Due to the location of underground services, street trees on Belmont cannot be provided, however this area is currently set to concrete parking/vehicular access, and at ground floor level, private courtyards and areas of defensible planting are proposed, adding some greenery to the street frontage.
- 13.16 Overall, the landscaping proposals are considered to be a public benefit of the scheme, providing aesthetic and biodiversity benefits to the proposal. Appropriate conditions shall be attached to any subsequent approval to secure these proposals, including details of their ongoing maintenance.

Green roofs

- 13.17 Green roofs (extensive) are proposed alongside roof level solar panels on Blocks A and C; this is considered to benefit the scheme. Full details of these, including their ongoing maintenance plans, shall be secured via conditions subject to approval.

Nesting birds, bats and biodiversity

- 13.18 The redevelopment has the potential to accommodate nesting birds and bats. A condition shall be attached to any subsequent approval requiring details of bird and bat boxes or bricks which could be incorporated into the fabric of the building where possible. Such boxes could help to encourage sparrows, swifts, starlings, and/or black redstarts, and bats.

Trees

- 13.19 Policy A3 of the Camden Local Plan considers the impact of development on trees and vegetation. It notes that the Council will resist the loss of trees with significant amenity, historic or cultural value, require satisfactory protection of retained trees during construction, expect the replacement planting of trees where the loss would result in harm, and expect developments to incorporate additional trees and vegetation wherever possible.
- 13.20 The proposal seeks to remove five trees from the site, and no street trees would be removed. These existing trees are located towards the southern/Belmont Street side of the site and are visible from the public realm. They range in quality, with three category C trees, one category B tree, and one category U. The removal of these trees would be subject to the planting of a minimum of seven publically visible trees (towards the southern end of the site), and a further ten trees within the courtyard. In addition to this, street trees would be provided on Crogsland Road and within the improved footpath running to the north of the site.
- 13.21 Whilst the removal of five trees on the site is regrettable, given the quality of these trees, and considering the wider landscaping improvements proposed as a result of the works, with a net increase of a minimum of 12 trees, including at least as many publically visible trees, the proposal is considered to be acceptable on balance in this regard.
- 13.22 Conditions have been attached to achieve full details of hard and soft landscaping, including tree planting, with replacement trees planted in a timely manner, and an appropriate programme of maintenance, as well as tree protection details where applicable for those trees remaining around the site. Subject to the attached conditions, the proposal is considered to be acceptable with respect to the impact on trees.

Conclusion

- 13.23 Given the above assessment, it is considered that the proposed development would result in high quality landscaping with the provision of play space. Additional street trees would line Crogsland Road and the footpath running to

the north of the site, and there would be a net gain of a minimum 12 trees across the site. Landscaping improvements would also be made to the footpath to the north of the site, and features would be incorporated to increase biodiversity across the site. The proposal would additionally make a contribution of £642,870 towards public open space provision, (secured by S106 legal agreement). The proposal therefore serves to achieve the aims of policy A3 of the Local Plan and is acceptable in this regard.

14 NEIGHBOURING AMENITY

Introduction

14.1 The application site is bounded by Belmont Street to the east, a public footpath with the Denton Estate beyond it to the north, Crogsland Road to the west, and a fish curing plant to the south. With the exception of the commercial fish curing plant to the south of the site, all surrounding uses are residential. The residential properties most likely impacted by the proposal are as follows (see map of properties at below):

- Denton Estate Block 1 (nos. 151, 152 and 153). Four storey block to the north of the site towards Crogsland Road. There is one flat on each floor at first to third floors, each being triple aspect (north, east and south facing).
- Denton Estate Block 2 (nos. 141-142, 146-150, and 154-156). Four storey block to the north of the site towards Belmont Street at an angle. Blocks 2-4 of the Denton Estate listed here have 5 x duplexes at ground and first floor, one duplex and 4 flats at second and third floors above. Each of the ground floors has a private garden, and some of the upper floor windows are set in to form balconies.
- Denton Estate Block 3 (nos. 143-145, 157-161, and 165-166). Four storey block to the north of the site towards Belmont Street facing southwards.
- Denton Estate Block 4 (nos. 167-176). Four storey block to the north-east of the site towards Belmont Street facing south-west.
- Nos. 94-102 Belmont Street (to the north-east of the site). This forms a terrace of five properties, each two storeys and dual aspect (east and west facing). Each has a generous rear garden amenity space.
- Nos. 1-64 Hardington Estate (to the east of the site) is an 11 storey residential block housing 64 flats. The westerly facing flats would be impacted by the proposed development, many of which are single aspect. Nos. 17, 23 and 29 Belmont Street (south of the site), is a three storey end of terrace style property divided into flats at ground, first and second floor levels.
- Extra-care centre on Crogsland Road (west of the site), a 6 storey redevelopment linked to this application comprising a day centre at ground floor and 38 extra-care flats above (ref: 2015/0921/P dated 07/07/2016).

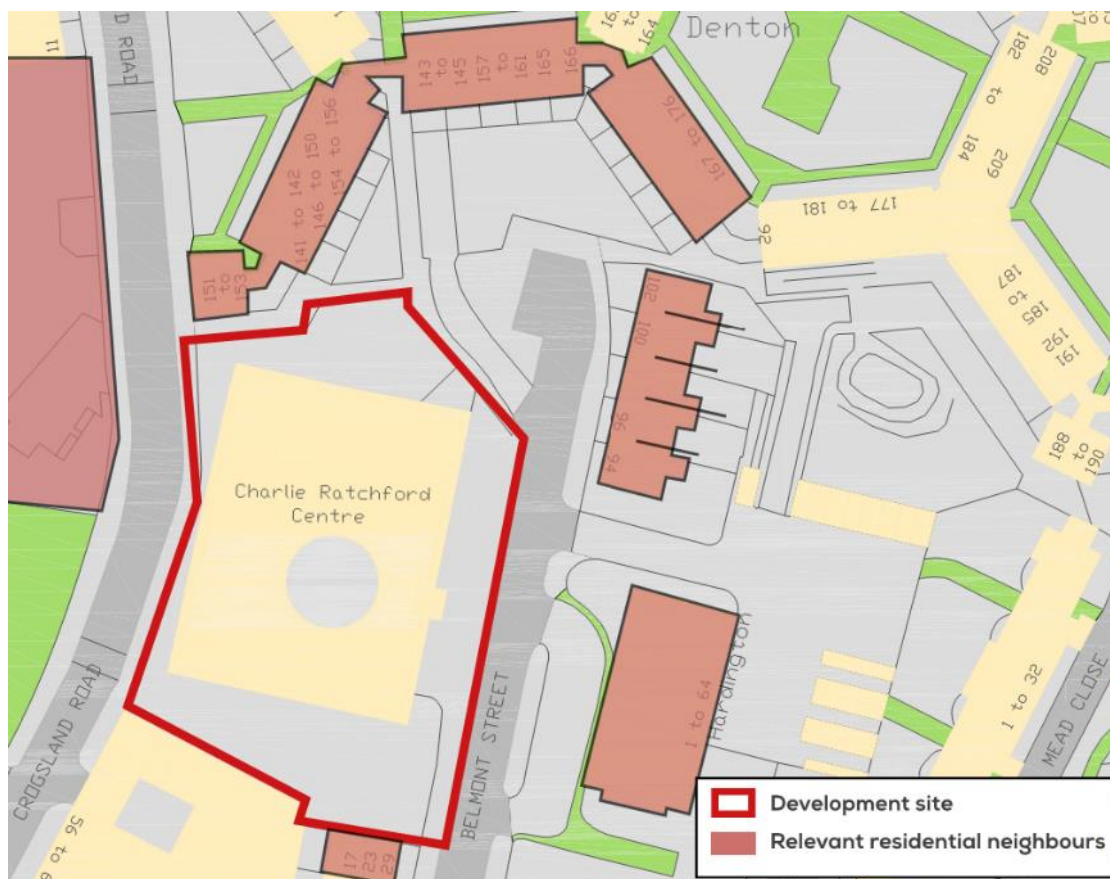


Figure 14: Residential properties most impacted by the development.

- 14.2 The Development Plan requires decision makers to have due regard to impacts on neighbouring uses and occupiers, particularly residential, on matters including daylight and sunlight, outlook, overlooking and noise, construction impacts and disturbance. Due to the large scale of the development the proposal has the potential to negatively impact on a number of existing uses and occupiers such as those listed above.

Daylight/sunlight, overshadowing and light pollution

- 14.3 A 'Daylight and Sunlight (impact on neighbours)' report has been submitted by GIA, who are a firm of Chartered Surveyors regulated by the Royal Institution of Chartered Surveyors. It provides an assessment of the potential impact of the development on sunlight and daylight and overshadowing to neighbouring residential properties based on the approach set out in the Building Research Establishment's (BRE) 'Site Layout Planning for Daylight and Sunlight: A Good Practice Guide (2011)'. The report makes use of three standards in the assessment of existing versus proposed daylight and sunlight levels:

- Vertical Sky Component (VSC) – This relates to daylight on the surface of a window. A measure of the amount of sky visible at the centre of a window. *The BRE considers that daylight may be adversely affected if, after development, the VSC is both less than 27% and less than 0.8 times (i.e. a reduction of more than 20%) its former value.*

- No Sky Line (NSL), also known as Daylight Distribution (DD) – This relates to daylight penetration into a room. The area at desk level (“a working plane”) inside a room that will have a direct view of the sky. *The DD figure can be reduced by up to 20% before the daylight loss is noticeable (i.e. retain 0.8 times its existing value).*
- Annual Probable Sunlight Hour (APSH) - A measure of the amount of sunlight that windows of main living spaces within 90 degrees of due south receive and a measure of the number of hours that direct sunlight reaches unobstructed ground across the whole year and also as a measure over the winter period. *The BRE considers 25% to be acceptable APSH, including at least 5% during the winter months. It recommends testing living rooms and conservatories.*

14.4 Overshadowing is assessed by considering any changes to surrounding outdoor amenity spaces. A Sun Hours on ground assessment has been undertaken which uses the BRE recommendation that 50% of the area must receive two or more hours of direct sunlight. An area of amenity space or garden may be adversely affected if less than half (50%) of the area is prevented by buildings from receiving two hours of sunlight on the 21st March and the area which can receive some sun on the 21st March is less than 0.8 times its former value.

14.5 The assessment shows significant impacts on several individual properties in the surrounding blocks. The existing site is an unusual low-rise block out of character with the otherwise dense urban character. This means that surrounding blocks currently receive uncharacteristically generous levels of light. It is an inevitable consequence of the built-up urban environment that daylight and sunlight will be more limited in dense urban areas, such as surrounding the application site. In such situations there may be many factors to be considered in addition to daylight and sunlight contributing to overall amenity for occupiers of existing buildings. The BRE notes that while the Guidance offers numerical target values in assessing how much light from the sky is blocked by obstructing buildings, *‘these values are purely advisory and different targets may be used based on the special requirements of the proposed development or its location’.*

Baseline

14.6 Camden Council (as landowner) created a Development Brief for the site (Nov 2015) which proposed an initial footprint and height for a potential forthcoming scheme – known as the ‘Brief Scheme’ (see Figure: 15 below). This Brief Scheme was indicative and broadly attempted to follow the surrounding scale and built forms. The applicant’s Daylight/Sunlight report uses the Brief scheme as a baseline for assessing the impact of the proposed scheme. However, this brief has no planning status, does not have planning approval, and so does not represent any fallback position. Therefore, it should not be used as a baseline and officers have assessed the impact against the existing low-lying and low density site. Officers however accept that the Brief Scheme does allow a helpful comparison by indicating equivalent impacts from an alternative massing which broadly follows the existing urban grain.

- 14.7 The existing CRRC is a single storey block and is therefore below the height and density that would typically be expected on a site such as this. The NPPF, London Plan, and Local Plan, all emphasise the need to make more effective use of land on under-used sites such as this. The low density and low lying nature of the site means surrounding properties currently receive unusually high levels of daylight and sunlight. As a result, any development of the site would impact on the daylight/sunlight of neighbouring properties, largely due to the unusually low level height of the existing CRRC. In order for the proposal to strictly adhere to BRE guidelines, the redevelopment would need to be significantly reduced, and would form a sub-optimal development of the site, contrary to Camden and London Plan policies. This can be seen in Figure: 15 below.

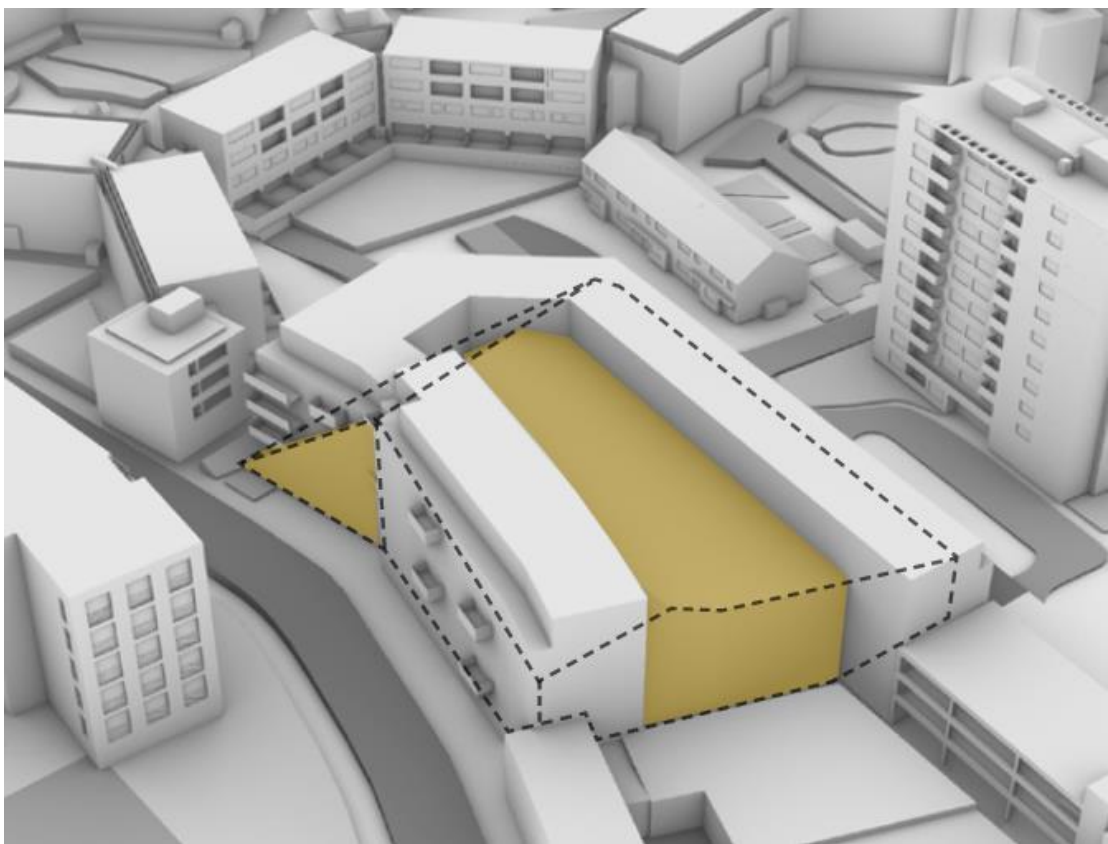


Figure 15: BRE compliant proposed massing shown in mustard with a dotted line border. This forms a sub-optimal development of the site.

- 14.8 The BRE compliant “cut-back” envelope shown in Figure 15, with the Brief Scheme overlayed, demonstrates that a BRE compliant scheme would need to avoid development at the north end of the site, and bring in the building lines to the east of the site which would significantly reduce the available footprint, and seriously compromise the quality of any internal courtyard space, whilst reducing internal separation distances to unacceptable levels. It would also have to remain low level at two to three storeys across most of the site.
- 14.9 The existing site (the baseline), Brief Scheme as a comparison, and the proposed development can be seen in Figure: 16 below.

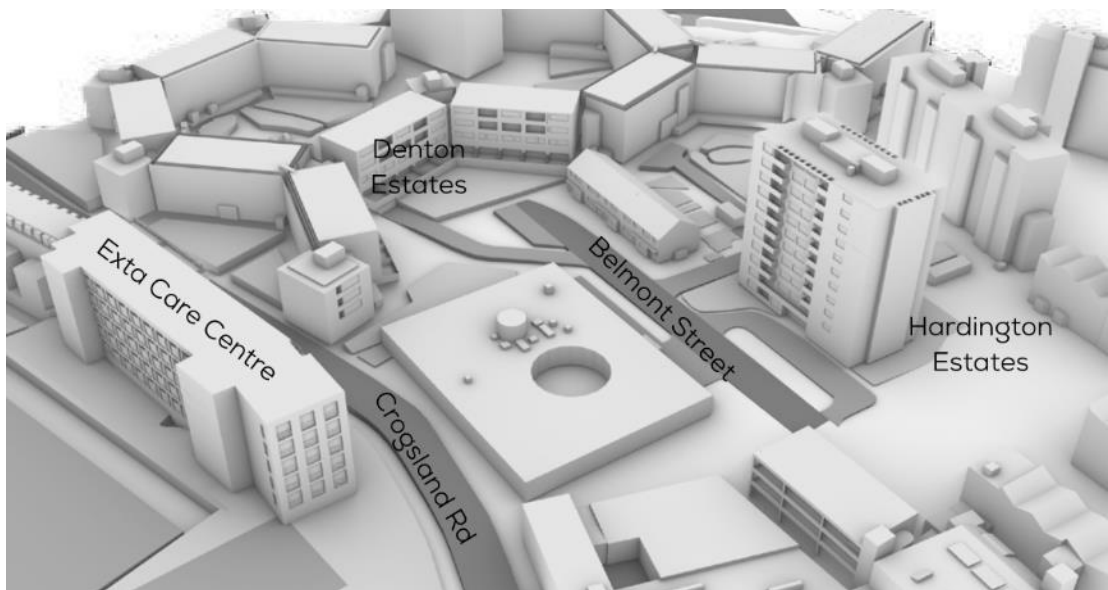


Figure 16a. Existing



Figure 16b. Indicative Brief Scheme (green)

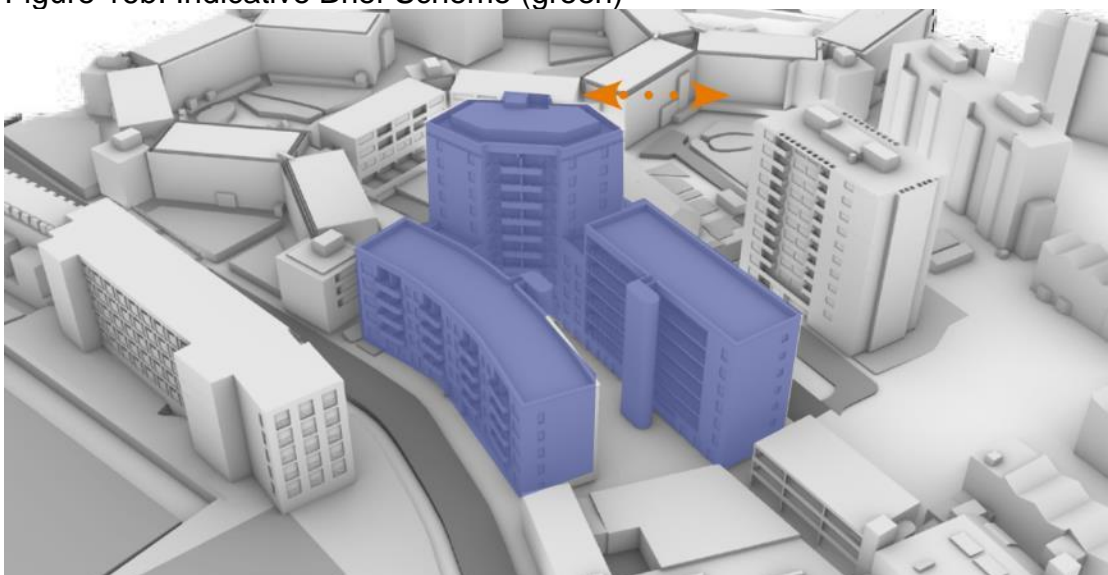


Figure 16c: Proposed scheme (blue)

14.10 The daylight sunlight report identifies several properties that are affected by the proposal. These are:

- Denton Estate Block 01 (nos. 151, 152 and 153);
- Denton Estate Block 02 (nos. 141-142, 146-150 and 154-156);
- Denton Estate Block 03 (nos. 143-145, 157-161 and 165-166);
- Denton Estate Block 04 (nos. 167-176);
- 94-102 Belmont Street (town houses);
- 1 to 64 Hardington Estate; and
- Extra Care Centre on Crogsland Road.

Denton Estate Block 01 (nos. 151 - 153)

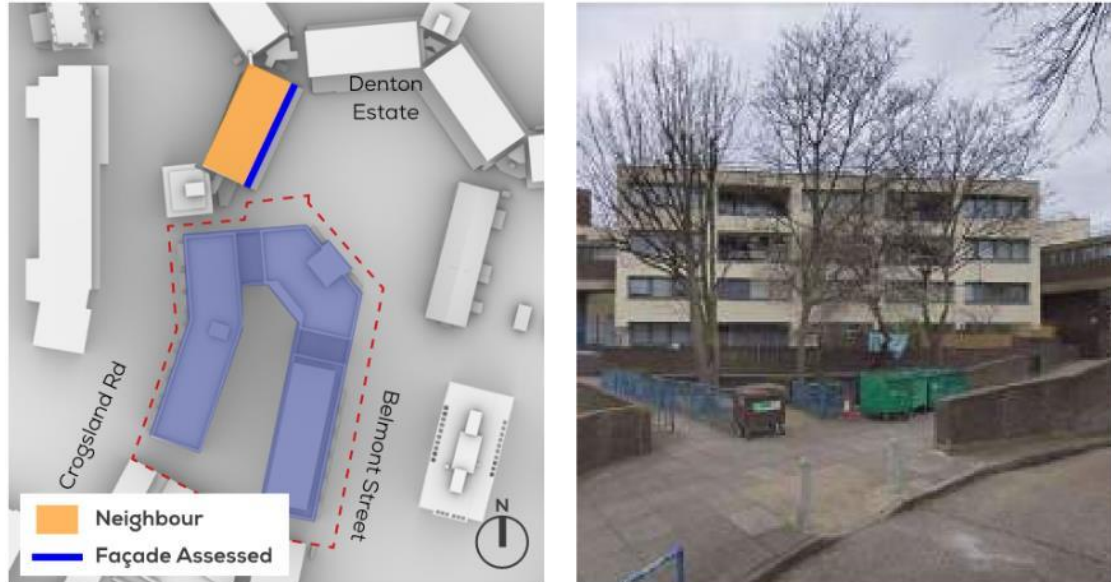


14.11 Block 01 is triple aspect (south, east and north facing) with the bedroom windows facing towards the site (on the blue line elevation shown above), the main living areas of the flats within Block 1 (facing north) would not be impacted by the works. One window (the most westerly pane on four-pane opening) serves a bathroom. The remaining three panes form a large window area that serves a bedroom. BRE guidance says bedrooms should be analysed although it acknowledges they are less important (2.2.8). This is because they have lower requirements for light.

14.12 These are the closest windows to the development and will suffer significant relative VSC reductions of around 70%. The retained levels will be between around 10-13% across the three floors which is low. However, the window opening is large there is a shallow plan form on the room which means light penetration remains good with relative reductions of NSL all under 5% and excellent retained levels all exceeding 90%. Sunlight is likely to be affected but again, BRE guidance notes that sunlight is most important to main living space rather than other rooms such as bedrooms, and so suggests checking impacts on living rooms and conservatories.

Whilst there is an impact on daylight and sunlight hitting the window surfaces, the rooms are bedrooms and daylight distribution within the room remains excellent. The impact is considered acceptable given the site context.

Denton Estate Block 02 (nos. 141-142, 146 to 150 and 154 to 156)

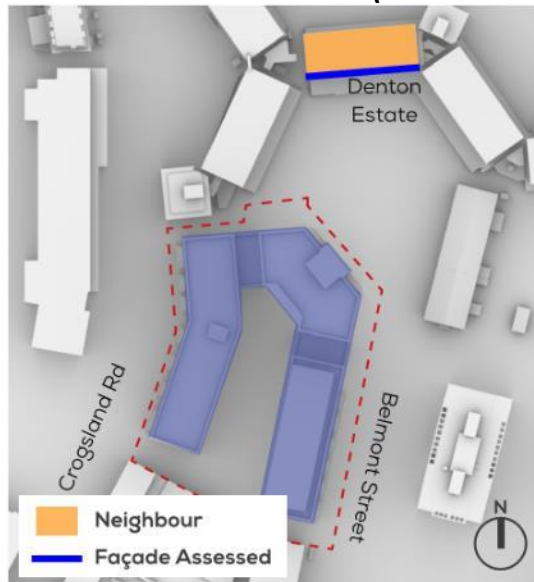


- 14.13 Block 2 is again close to the proposed development, but it is at an acute angle and so only takes sky from the edge of windows. As a result, 15 of the 25 windows assessed are fully compliant with BRE VSC targets. The 10 windows that do not comply only suffer minor shortfalls. Five windows have relative reductions of less than 25% and actual reductions of less than 8pp (pp means percentage points). Of the remaining five windows, all but one have retained VSC levels of more than 20% with levels around the 18% mark commonly considered appropriate for denser urban environments. The remaining window (reference 4SE1) is on the ground floor and is located under an over-hang on the building. This means it already suffers lower levels of daylight (16.2% VSC) due to the design of the host building and it will only be reduced by 5.1pp to 11.1% VSC.
- 14.14 Furthermore, all windows on the block, including 4SE1, will retain excellent daylight distribution into the rooms with retained levels all in excess of 90%, and relative reductions all under 7% and well within the BRE target.
- 14.15 There is an impact on sunlight as the block sits close to the proposed development and north of the taller element, but the impacts are not significant for most windows given the impact. Although the total APSH reductions for many windows are in excess of the BRE suggested target of 20%, the vast majority retain total APSH above the 25% target. Only four windows fall below total APSH of 25%, and these are all between 20-24%. There will be bigger impacts in winter because the sun will be lower and so easier to obstruct, but only six of the 25 windows would be below the 5% retained winter APSH target. In addition, three of these six windows would have below target winter hours

even with the lower brief scheme, indicating it would be necessary to under-develop the site in order to avoid such an impact.

- 14.16 Whilst there are impacts on the block, these impacts are limited and good amounts of daylight would continue to reach the rooms. On the whole, the windows and rooms would continue to receive good levels of sunlight throughout the year and the impacts are considered acceptable.

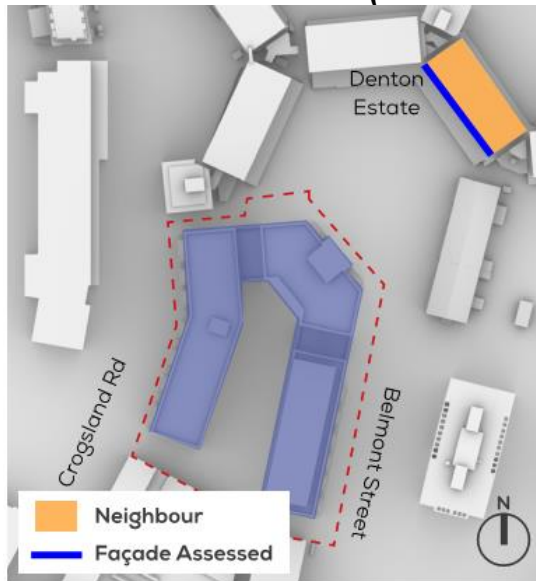
Denton Estate Block 03 (nos. 143 to 145, 157 to 161 and 165-166)



- 14.17 Block 3 is set further from the development but faces the taller element. As a result, 12 of the 25 windows assessed are fully compliant with BRE VSC targets. The 13 windows that do not comply only suffer minor shortfalls in most cases with all of them having actual reductions of less than 8pp. Four of the 13 windows have relative reductions of VSC of less than 23%, only marginally in excess of the BRE targets. Of the remaining nine windows, five are on the ground floor, underneath the overhang, so they already have lower starting VSC values 17% as a result of the host building design. The remaining four windows are grouped across the second and third floors, facing the proposed tower element and are within inset balconies. These four windows also have lower starting levels of daylight (because of the balcony overhangs) which means relative reductions can be more in percentage terms. They have existing VSC levels of 18.2 - 19.3%, with retained levels of 12.5 – 13.8% and as a result, the actual reductions are all less than 6.1pp. This is comparable to the Brief Scheme which would affect the same windows, with actual reductions for those windows being between 3.7 and 4.6pp.
- 14.18 Although there will be notable VSC reductions to the block, focused on the ground floor and the four windows within balconies on the upper floors, all windows on the block, including those most affected, will retain excellent daylight distribution into the rooms. Retained levels for all windows are in excess of 90%, and relative reductions all under 10% - well within the BRE target.

- 14.19 In addition, there is only a minimal impact on sunlight to the block because it is south facing and set back. Only the ground floor, with its built-in overhang, does not meet the retained BRE APSH targets. Nonetheless, retained total APSH levels for these windows are all between 15-18% with winter hours exceeding targets (and in most cases, double the BRE recommendation).
- 14.20 Whilst there are impacts on the block, again good amounts of daylight would continue to reach the rooms. On the whole, the windows and rooms would continue to receive good levels of sunlight the impacts are considered acceptable given the context and the design of the host building.

Denton Estate Block 04 (nos. 167 to 176)



- 14.21 Block 4 has the same design features as blocks 2 and 3, with inset balconies on the upper floors and an over-hang above the ground floor. As a result, it would have similar localised impacts. Of the 25 windows assessed in Block 03, 15 meet the BRE VSC targets. Five of those not meeting targets are again on the ground floor under the over-hang, but as with the other blocks, the actual distribution of light in the rooms would remain high, and compliant with BRE targets. All bar one of the ground floor windows have retained NSL levels of more than 96% with the lowest experiencing a compliant 14.1% relative reduction, and retaining more than 80% daylight distribution. The five remaining largest reductions in VSC are again experienced within rooms set behind inset balconies, which would be expected as a result of the design of the subject flats. As such, they have lower starting daylight and sunlight levels. These windows see reductions that range from 24% up to 32.1%. However, the sky visibility within all rooms would again remain very good with internal daylight distribution in excess of 98% NSL.
- 14.22 Again, the sunlight levels remain generally good across the block and all windows on the upper floors meet the BRE sunlight target values. The notable impacts are limited to the ground floor windows again, under the over-hang. The ground floor windows start from lower value as a result of their design, with existing total APSH ranging from 26% to 31%. Four would be reduced to levels

ranging from 18% to 21%, with the other window reduced from 26% to 15%. These would be notable reductions in sunlight for the ground floor windows but they should be considered in the context of the existing over-hang, the overall impact on the block, and the nature of the existing under-developed site.

- 14.23 Overall, the impacts are acceptable given the urban context, the underdeveloped application site, and the design of the neighbouring block itself. The impacts are focussed on windows placed underneath over-hangs, and all these windows are set back to provide more outdoor space for occupiers, either in balconies or gardens, which would offer good amenity. The impacts are therefore considered acceptable overall.

94-102 Belmont Street

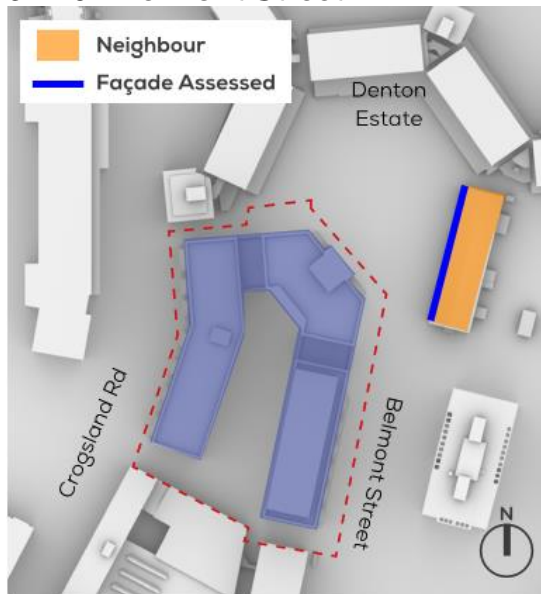


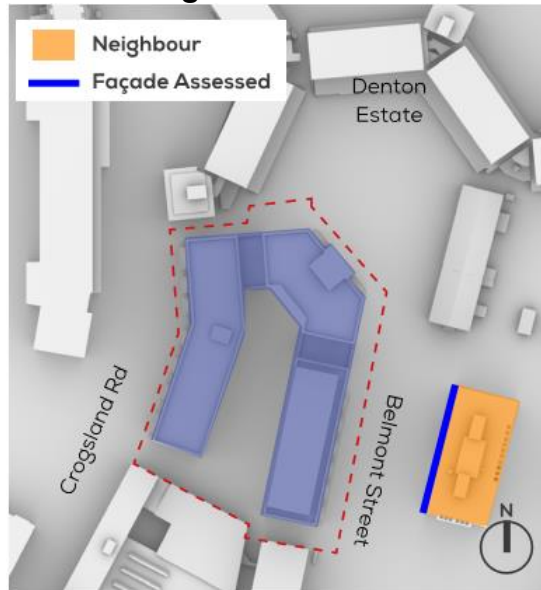
Fig. 21: Property Google street view - front



- 14.24 These five terraced properties are houses and dual aspect. The gardens are to the rear, away from the proposed development, and are south facing so daylight and sunlight to this elevation will be unaffected.
- 14.25 Of the 18 windows facing the development on the terrace, three are very small side windows to bays and provide aspect rather than any significant level of lighting. Nonetheless, two would receive no reduction at all. All other windows would experience relative reductions of greater than 20% VSC. However, three of these (all at no.102) would have relative reductions of 25% or less, good retained levels of more than 21% VSC, and completely unaffected NSL values retaining excellent daylight distribution.
- 14.26 A further seven of the windows tested would all have retained VSC levels of between 17% and 22% which given the context of the site in a dense urban environment is considered an appropriate level. Furthermore, all have BRE compliant impacts on day light distribution within the property, apart from one window at no.96 which marginally exceeds the 20% reduction target by only 1.2%.

14.27 The remaining five windows tested are at nos. 94 and 96, and they do suffer more significant impacts. Retained VSC levels vary between 11 and 15% which is low. However, daylight distribution within these rooms remains in excess of half the room, with retained levels varying between 60% and 82%. Also, four of the five are also at first floor level which are likely to be bedrooms – with BRE guidance recognising these are less important and are not primary living spaces. Coupled with the fact that the houses are dual aspect, and would continue to enjoy unaffected daylight and sunlight to the rear aspect, the impacts are considered notable but acceptable.

1-64 Hardington Estate



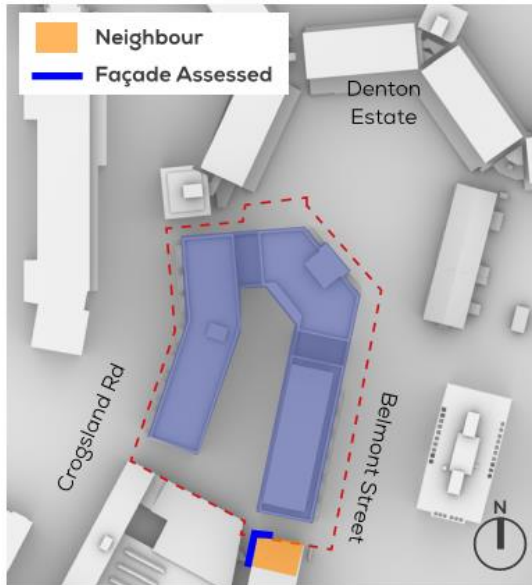
14.28 The block currently overlooks the low-rise and underdeveloped site, and so experiences an open aspect. Despite this the design of the block includes columns of balconies which are set into corners. This means that despite the open aspect, there are several windows set under balconies and into corners which have low existing levels of VSC, so small actual reductions translate as large relative reductions.

14.29 Of the 85 windows assessed, 41 are compliant with both VSC and NSL recommended BRE targets, with good retained levels of light. These are all on the upper floors – from the fifth floor upwards – with floors eight, nine, and ten seeing all windows comply. Impacts increase as you move down to the lower floors.

14.30 Only one window on the seventh floor does not meet the recommended VSC targets, with three on each of the sixth and fifth floors. These seven windows are all set below balconies, and whilst their relative VSC reductions are between 24.6% and 52.9%, they have low starting values and only have actual reductions of between 4.3pp and 8.4pp. Furthermore, they all have no real impact on their NSL with excellent daylight distribution in the rooms of 98.9% or greater.

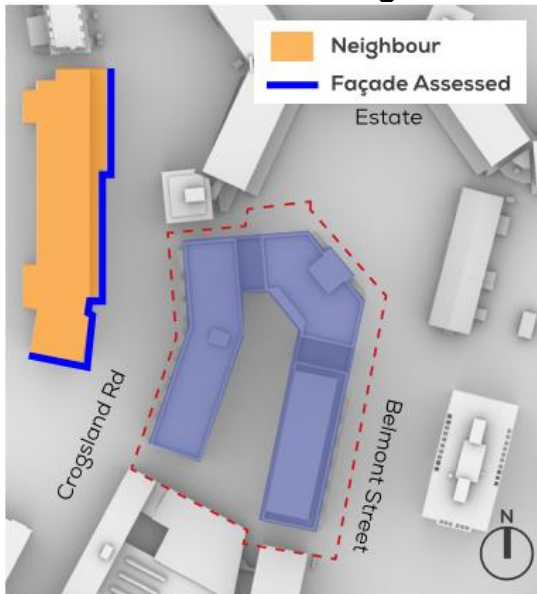
- 14.31 On the fourth floor, four of the windows retains very good VSC levels, all in excess of 24.5%. Only one of these four windows does not comply with NSL targets, but that window still has a good retained daylight distribution of 73%. The other four windows on this floor are all inset under balconies so again experience bigger impacts. Relative VSC reductions vary between 22.2% and 65.3% but with lesser impact on the actual daylight distribution within rooms. They retain good levels of light penetration with NSL retained values between 75.2% and 93.9%.
- 14.32 From the third floor and below, the impacts are more significant and all windows suffer significant VSC reductions ranging 28.3% to 83.8%, with an outlier at 98%. This is due to a combination of factors including stacked balconies on the existing building, some very low existing VSC values (as low as 7.6%), large proportionate reductions due to the low and open site that currently exists, and height and siting of the proposal, away from the main street side and facing this block. However, of those 29 windows across the lower four floors, 11 of them still retain commonly accepted VSC values for a dense urban environment of 18% or more.
- 14.33 The 18 remaining windows serve seven flats and they have lower retained VSC levels. Ten of these windows have daylight distribution exceeding 50% so more than half the room would receive daylight to a working plane. However, the siting of the proposed massing, design of the existing host building and the open site opposite mean that significant impacts at these lower floors are inevitable. Indeed, comparing the impacts to those of the Brief Scheme also demonstrate that these 18 windows would still fail to comply with BRE recommended targets, even for a lower and less dense proposal. As demonstrated by the cutback showing the compliant BRE envelope (Figure 15), the only solution to avoid harm to light would be to significantly under develop the site which runs against an underlying principle of national policy, the London Plan, and the Local Plan.
- 14.34 The lower floors of the block suffer notable reductions in daylight, in particular to seven flats, although the impacts vary. Those windows set within balconies tend to see the greatest impacts, and there is normally a trade-off with the over-shading that comes from access to this private amenity space. This impact needs to be viewed in the context of the development, notably that the existing CRRC is well below what could be reasonably expected of this urban London location. On balance, the harm caused to daylight levels at neighbouring properties within the Hardington Block (and surrounding area generally) is considered not to warrant the refusal of this application when balanced against the other benefits of the scheme and the more effective use of land.

17, 23 and 29 Belmont Street



- 14.35 Only two windows on this block need to be tested for possible impact as the remainder of the block faces away from the development and into a wall. The second-floor window is fully compliant with BRE recommended targets for both VSC and NSL. The first-floor window is compliant in terms of NSL and shows a 20.4% reduction in VSC, only 0.4% in excess of the BRE recommendation. The impact is very minimal and is acceptable.

Extra-care centre on Crogsland Road

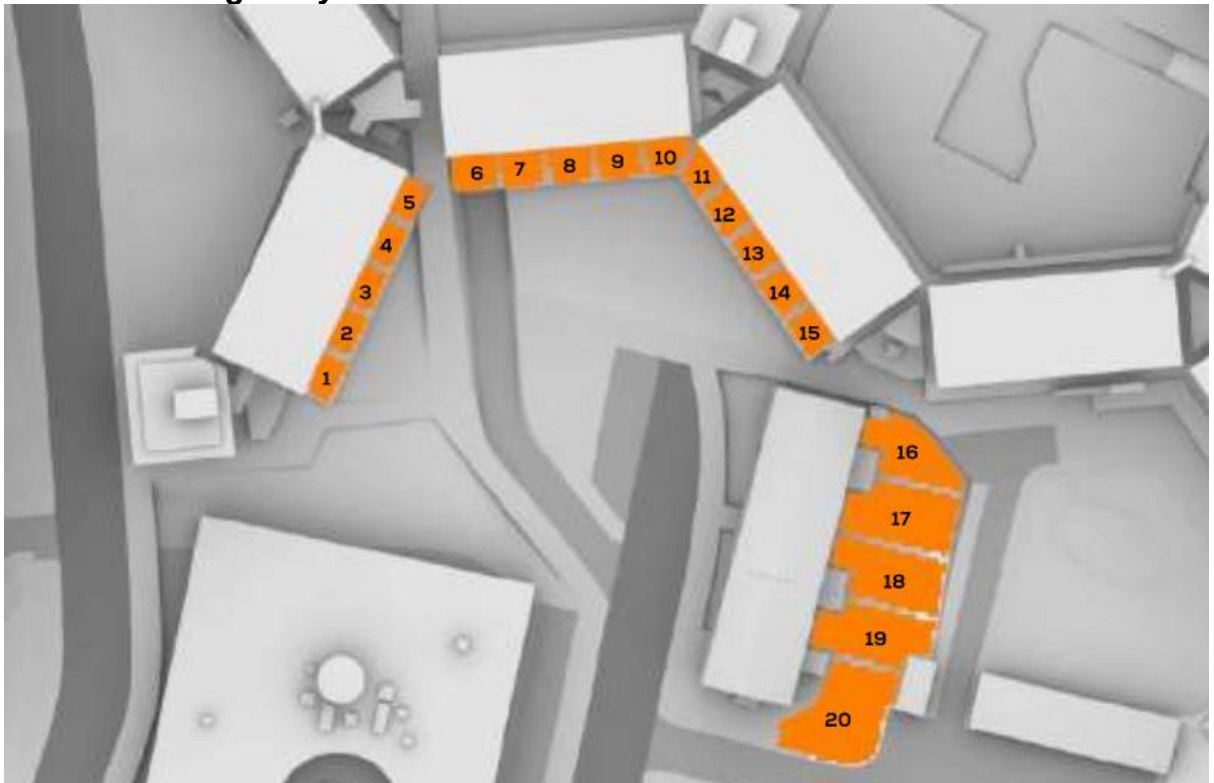


- 14.36 The block receives minimal impacts in terms of daylight. The vast majority fully comply with BRE guidance for relative reductions for both VSC and NSL. The minority that experience reductions above the recommendation nonetheless retain good levels of daylight for the urban context, all in excess of 20% VSC. In addition, all but one of the windows fully comply with NSL relative reductions, and the one that exceeds the recommended 20% reduction only does so

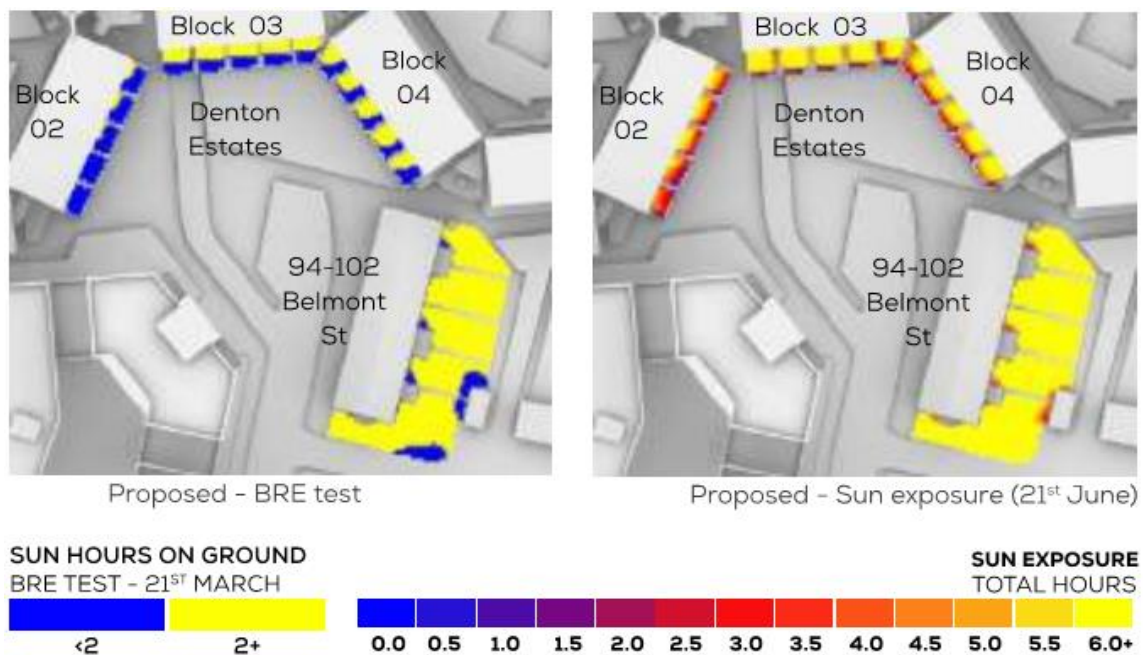
marginally, by 1.5pp. Furthermore, an additional Average Daylight Factor (ADF) test has been completed for the Extra Care centre as the layouts of rooms are known. All bedrooms tested would exceed the 1% minimum BRE recommendation. There are minor reductions to other rooms, however, as with the VSC reductions, the losses are minimal (0.0pp to 0.7pp).

- 14.37 All the living areas assessed within the Extra Care Centre are dual-aspect and as such, despite some individual windows experiencing noticeable reductions in their sunlight levels, there is only one room which will breach the BRE threshold for sunlight losses with the proposal in place, the same room would also experience a noticeable reduction from the lower Brief Scheme. However, the retained levels would be reasonable, with the room retaining 23 total APSH and 3 in winter.
- 14.38 Overall the impacts to the block are in line with the urban context and considered acceptable.

Overshadowing analysis



- 14.39 The private gardens of the above properties have been assessed for potential overshadowing effects. Gardens 6 to 20 (Denton Estate blocks 03 and 04, and 94-102 Belmont Street) would see more than 50% receive 2 or more hours of sun on the ground on 21 March, in compliance with the BRE guidance.
- 14.40 Gardens 1 to 5 to Denton Estate block 02 would however receive significant reductions and less than 50% sun on ground as they are so close to the development. The following diagram to the left shows the overshadowing to the gardens in block 2 under the BRE test.



14.41 The diagram to the right shows a sun exposure test on 21 June which shows 3.5 hours of sun on the majority of the ground within the gardens.

14.42 The scheme will only cause overshadowing to the closest private gardens at the base of the tallest element. It will be a significant impact for those five gardens, but they will still receive more than 3.5 hours exposure to sun in most of their spaces at the summer solstice. Overall, the localised impact is considered acceptable given the context of the site and the need to deliver significant numbers of new homes.

Outlook

14.43 Whilst with most developments of this scale there would be some impact on the level of outlook to neighbouring properties, particularly given the underutilised nature of the single storey block across the CRRC site at present, the proposal is considered not to result in undue harm to neighbouring outlook. The proposal would be set a fair distance from neighbouring properties, with the largest separation distances given to the tallest element at Block B to the north of the site. There would be approximately 23.2m between the front elevation of Block A and the front elevation of Hardington (opposite). There would be a small pinch point of 16m between Block B and the closest neighbouring property, but this would still achieve a considerable level of outlook. It is also worth noting that these properties on Belmont Street are dual aspect houses, with the rear outlook being unaffected by the works. The remainder of Block B would have a separation distance of over 30m facing towards the Denton Estate. There would be another pinch point to the northern elevation of Block A (looking towards Block 1 of the Denton Estate). As established previously, the flats in Block 1 of the Denton Estate are triple aspect and whilst the outlook towards the proposed 5 storey Block A would be reduced to some degree, the flats would continue to receive a good quality of outlook from the remaining elevations. The extra-care centre would be approximately 18.6m away, thereby ensuring a continued good quality of outlook for occupiers. See Figure 22 below.

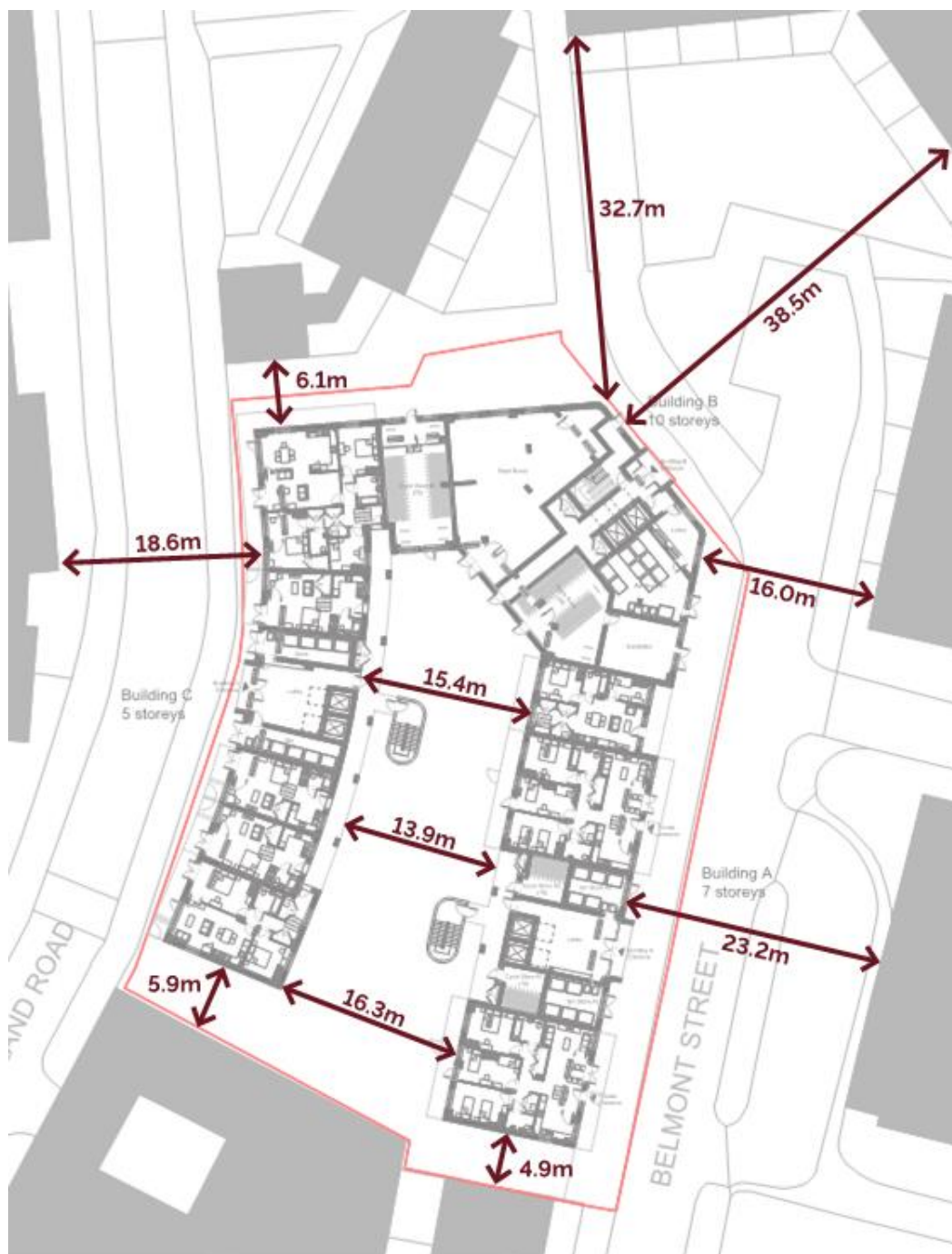


Figure 22: Separation distances to neighbouring properties.

14.44 On this basis, the proposal is considered to maintain a good quality of outlook to neighbouring properties.

Overlooking/loss of privacy/light spill

14.45 Whilst a degree of overlooking from a proposal of this scale is inevitable, the design has been carefully considered to reduce the potential for overlooking.

14.46 Block A would follow the prevailing building line, and would be separated from Hardington to the east by approximately 23.2m, separated by mature trees.

Block B responds to the layout of the Denton Estate to the north which is set back from the northern site boundary. Minimum separation distances would be approximately 16m, but generally separation distances would be much greater.

- 14.47 Block C maintains the prevailing building line along Crogsland Road. Windows on the northern elevation in particular have been carefully considered to ensure privacy is maintained within flats on the Denton Estate. However it is noted that the secondary side facing living area windows would face Block 1 on the Denton Estate at a distance of just 6.1m. As such, a condition shall be added to ensure that these windows are obscure glazed and non-opening to an internal height of 1.7m.
- 14.48 Given the design and layout of the proposed development, coupled with the separation distances proposed, and subject to the above condition, the development is considered not to result in unduly harmful levels of overlooking to neighbouring properties.
- 14.49 Whilst the proposal has the potential to form a degree of light overspill, given the design of the proposed development (with appropriately sized windows, set away from neighbouring properties), coupled with the residential use of the site, the proposal would not result in harmful levels of light overspill.

Noise and vibration impacts

- 14.50 The applicant submitted an acoustic assessment, which considers the suitability of the site for residential purposes as well as the impacts of the fixed plant attached to the roof of Block B (10 storey block).
- 14.51 Appropriate noise guidelines have been followed within the report such as Noise Policy Statement for England, National Planning Policy Framework 2019 (NPPF), Planning Practice Guidance on Noise, Camden Council's Local Plan 2017 and BS 4142:2014.
- 14.52 Providing the recommendations contained within the report are introduced, the development would comply with the requirements of both planning and acoustic design guidance and therefore are acceptable in environmental health terms.
- 14.53 No objection has been raised by the Council's Noise Officer subject to the attached conditions.

15 TRANSPORT AND HIGHWAYS

Policy review

- 15.1 The Local Plan polices most relevant to this application include T1 - promoting sustainable transport; T2 - all new developments should be car-free; T3 - seeking transport infrastructure improvements and T4 - sustainable movement of goods and materials. The London Plan policies on transport of relevance include:

- Policy T1 (Strategic approach to transport)
- Policy T2 (Healthy streets)
- Policy T3 (Transport capacity, connectivity and safeguarding)
- Policy T4 (Assessing and mitigating transport impacts)
- Policy T5 (Cycling)
- Policy T6 (Car parking)
- Policy T7 (Deliveries, servicing and construction)
- Policy T9 (Funding transport infrastructure through planning)

15.2 London Plan policy T1 (Strategic approach to transport) states that proposals should facilitate the delivery of the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041. It also states that all development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.

Site overview

15.3 The site has a PTAL rating of 6a, which is an excellent level of public transport accessibility. The nearest transport interchange is Chalk Farm Station (Underground) located 160m to the southwest of the site. The nearest bus stops are located on Chalk Farm Road, Haverstock Hill, Adelaide Road and Prince of Wales Road.

15.4 The site is also located within the Camden Town (North West) controlled parking zone (CPZ CA-F(nw)), which operates between 0830 and 2300 hours on Monday to Friday and between 0930 and 2300 hours on Saturday and Sunday. Our records indicate that the ratio of parking permits to parking spaces in the Camden Town CPZ is 1.15. This suggests that parking stress is a significant issue in the CPZ.

15.5 Various roads in the vicinity of the site experience high levels of cycling. These include Crogsland Road, Chalk Farm Road, Adelaide Road, Regent's Park Road, Haverstock Hill and Prince of Wales Road.

Trip generation

15.6 The uplift in person trips generated by the development has been estimated at 82 (2-way) in the AM Peak (08:00-09:00) and 87 (2-way) in the PM Peak (17:00-18:00). As the development would be largely car free, most trips would be by public transport, cycling and walking. The impact on the highway network would therefore be negligible. The impact of servicing trips is considered in the relevant section of this report below.

Cycle parking

15.7 174 cycle spaces would be provided within four internal bike stores (two in Block A, and one each in Blocks B and C). The number of cycle spaces proposed meets the current London Plan requirements.

- 15.8 The spacing for the cycle parking is less than the minimum recommended by CPG Transport. However, the applicant has found a manufacturer that provides racks that can operate within the proposed dimensions. This would be considered acceptable, subject to the attached condition requiring approval of the cycle storage details. The revised ground floor plan indicates that the doors to the cycle stores have had their widths widened to 1.2m, which is considered to be acceptable.

Car parking

'Car-free' development

- 15.9 Policy T2 of the Camden Local Plan states that the Council will limit the availability of parking and require all new developments in the borough to be car-free. To prevent the future occupants from obtaining on-street parking permits from the Council, the development shall be subject to a car free agreement and this would be secured by means of a Section 106 Agreement.

'Blue-badge' disabled parking

- 15.10 The applicant estimates a requirement for three disabled parking spaces and proposes these to be on street. An indicative layout has been submitted that shows one disabled space in Belmont Street and two disabled spaces in Crogsland Road in an area that currently has double yellow lines.

Parking beat survey

- 15.11 The applicant has acknowledged errors in the Parking Beat Survey submitted with the application, where permit parking spaces were incorrectly assessed as residents bays. Considering this alterations, the parking stress percentage would increase from 77% to over 100%. Over 85% occupancy is generally considered as a cause for concern, resulting in drivers spending a significant amount of time trying to find a parking space.
- 15.12 The proposal requires three disabled parking spaces which would be provided on street, two on Crogsland Road and one on Belmont Street.
- 15.13 The spaces on Crogsland Road would indicatively consume an area currently set to double yellow lines, or with minor alterations to the positioning of existing bays. On the Belmont Street side, it is acknowledged that the frontage to the CRRC currently has a dropped kerb which would be reinstated as part of the consent. This would allow for parking on the Belmont Street frontage which could accommodate the anticipated disabled parking bay. It is further acknowledged that the disabled parking spaces could not be reasonably accommodated on site without resulting in a significant impact on the design of the proposal and the number of units proposed. Only three disabled parking spaces are proposed (in compliance with relevant policy) with the remainder of the flats being car free (secured by S106 legal agreement). As such, it is anticipated that the three parking spaces could be accommodated surrounding

the site following the works, and on balance, this is considered to be acceptable. The exact location of the disabled bays would need to be subject to detailed design and consultation. The costs of this would be covered by a S106 agreement.

Delivery and servicing activities

- 15.14 Table 8-1 of the submitted Transport Assessment (TA) contains details of the predicted servicing demand and shows a total of 9 delivery vehicles on a typical day. This is lower than would be expected of a development of this scale.
- 15.15 Whilst on-site delivery would typically be encouraged in compliance with policy T4, it is acknowledged that on-site servicing could not be reasonably accommodated without significantly altering the design of the proposal and number of units proposed.
- 15.16 As there are no on-street loading bays at present which could be used, it would be necessary to convert either a residents' bay or a pay-by-phone bay to a loading bay on Crogsland Road. The double yellow lines discussed in the 'parking beat' survey section above may also be appropriate for conversion. This would need to be subject to detailed design and consultation. A highways financial contribution would be sought from by Council and secured via a combined Section 106 and Section 278 agreement to cover the cost of implementation. Whilst there are some concerns arising from this given the parking stress in this location, on balance, the proposal would not warrant refusal on this basis.
- 15.17 The TA states that automated drop-boxes would be installed on site to reduce dwell times for couriers. This is welcomed and an appropriate condition requesting details of the drop-boxes shall be secured by condition subject to approval.

Highways works

- 15.18 The Belmont Street site frontage is currently a continuous dropped-kerb vehicular access. This would need to be rebuilt as footway. A highways financial contribution would be sought from by Council and secured by a combined Section 106 and Section 278 agreement, where the Council's contractors would remove the redundant crossover and reinstate the pedestrian footway.
- 15.19 Construction access would be from Crogsland Road. The footway directly adjacent to the site would sustain significant damage as a direct result of the proposed works. A financial contribution for highway works would therefore need to be secured as a section 106 planning obligation if planning permission is granted. This would allow the proposal to comply with Policy A1 (Managing the impact of development) and paragraph 6.11 of the Local Plan.
- 15.20 The highways costs of the proposed scheme are set out below, this would be secured by S106.

Removal of long dropped kerb crossover and reinstatement to footway on Belmont Street	£22,412.11
Repair of footway in Crogsland Road, post construction	£14,703.21
Installation of three disabled bays, including design, implementation, consultation and TMO costs	£3,144.14
Conversion of a Pay-by-Phone bay in Crogsland Road to a loading bay including implementation, consultation and TMO costs.	£2,771.68
Total cost to be secured by S106	£43,031.14

Pedestrian, cycling and environmental improvements

- 15.21 The Council is currently developing proposals to improve the junction of Chalk Farm Road, Haverstock Hill, and Adelaide Road. The proposed development would benefit from this scheme as routes to and from the site for cyclists and pedestrians would be safer and more attractive.
- 15.22 A financial contribution of £113,000 towards Pedestrian, Cycling, Environmental and Public Realm Improvements for the local area would be secured as a section 106 planning obligation.

Managing the impact of construction

- 15.23 The proposal would generate an appreciable number of construction vehicle movements during the overall demolition and construction period. The proposed works could therefore have a significant impact on the operation of the public highway in the local area if not managed effectively.
- 15.24 A draft Construction Management Plan (CMP) has been submitted in support of the application. A CMP and associated implementation support contribution of £22,816 would be secured via S106 on a development of this scale and in this location. A Construction Impact Bond of £30,000 would also be secured by S106.

Travel planning

- 15.25 As the development would generate a significant number of person trips, a strategic travel plan and associated monitoring and measures contribution of £9,618 would be secured via a S106 agreement.

Summary and Conclusions

- 15.26 Given the above, and subject to the attached conditions and obligations secured via legal agreement, the proposed development is considered to comply with policies T1, T2, T3 and T4 of the Camden Local Plan, as well as guidance contained within the London Plan and is acceptable in this regard.

16 SUSTAINABLE DESIGN AND CONSTRUCTION

- 16.1 The Local Plan requires development to incorporate sustainable design and construction measures, to ensure they use less energy through decentralised energy and renewable energy technologies. All developments are expected to reduce their carbon dioxide emissions by following the steps in the energy hierarchy (be lean, be clean and be green) to reduce energy consumption. Policies CC1 and CC2 of the Local Plan require development to minimise the effects of and be resilient to climate change and to meet the highest feasible environmental standards. Developments must achieve a 20% reduction in CO2 emissions through renewable technologies (the 3rd stage of the energy hierarchy) wherever feasible. They are also expected to achieve a BREEAM 'Excellent' rating and minimum credit requirements under Energy (60%), Materials (40%) and Water (60%).
- 16.2 For this residential development, the proposals must follow the energy hierarchy set out in the London Plan Policy S1 2 and meet the target for zero carbon for major development. The proposed development must achieve at least a 35 per cent reduction in regulated carbon dioxide emissions (beyond Part L 2013) on site as set out in the Energy Planning – GLA Guidance on preparing energy assessments 2018.
- 16.3 Where the London Plan carbon reduction target cannot be met on-site, the Council may accept the provision of measures elsewhere in the Borough or a financial contribution (charged at £95/tonne CO2/year over a 30-year period) to secure the delivery of carbon reduction measures on other sites. Policy S1 2 of the London Plan requires development to be designed in accordance with the energy hierarchy: be lean (use less energy), be clean (supply energy efficiently), be green (use renewable energy).
- 16.4 The application is supported by a Sustainability Statement setting out how the scheme would implement the sustainable design principles as noted in policy CC2 and ensure that it does not increase flood risk and reduces the risk of flooding where possible as noted in policy CC3 and specifically demonstrates that the residential development is capable of achieving a maximum internal water use of 105 litres per day (plus an additional 5 litres for external water use).
- 16.5 The proposal would exceed the 10% 'Be Lean' target by reducing CO2 emissions with a 16% reduction. It would exceed the 20% 'Be Green' emissions target with a 65% reduction. It would also exceed the 35% overall on-site reduction, with a 71% reduction. It would however fail to reach the overall zero carbon emissions, and so a Carbon Offset contribution of £93,324 is required by S106 legal agreement.
- 16.6 The proposal would incorporate efficiency and passive cooling measures with openable ventilating windows, good U-values and low energy lighting. It would also include a communal air source heat pump system with low temperature distribution via Heating Interface Units (HIUs) in each flat.
- 16.7 202 solar photovoltaic (PV) panels would be mounted on the flat roofs of Blocks A and C (roof of Block B reserved for plant). This would have an anticipated generating capacity approximately 50 kWp and yield 42,925 kWh/year.

- 16.8 Extensive green roofs would be incorporated alongside PV panels on Blocks A and C, with further biodiversity improvements arising from the landscaping and planting scheme proposed for the central courtyard.
- 16.9 On this basis, the proposal is considered acceptable on sustainability and energy efficiency grounds, subject to the following planning obligations and conditions being secured in the event of an approval:
- Sustainability measures to be secured through S106 sustainability plan
 - Water efficiency targets to be secured through S106 sustainability plan
 - Energy provisions to be secured through S106 EE&RE plan:
 - Passive and efficiency measures in accordance with the proposed plans
 - CO2 reductions beyond Part L 2013 as amended, SAP10 factors:
 - minimum 71% on-site overall reduction;
 - minimum 16% Be Lean stage reduction through building efficiency;
 - minimum 65% Be Green stage reduction (reduction against the previous stage) through renewables
 - Future-proofing details to be secured through shadow S106 clause:
 - to include adequate plant space for heat exchanger and pipework, soft points in plant room walls for connection to pipes, and a protected route for pipework to the most likely roadside on site boundary
 - Carbon offset contribution - £93,324
 - Solar PV details by condition
 - Air Source Heat Pump details by condition
 - Green Roof details by condition

17 AIR QUALITY

- 17.1 The Local Plan requires the submission of air quality assessments for developments that could cause harm to air quality. Mitigation measures are expected in developments located in areas of poor air quality.
- 17.2 The air quality impact risks are assessed to be medium. A standard planning condition would require baseline monitoring details including at least 3 months data. The proposed locations of dust monitors should reflect dust sources, sensitive receptors, guidance on avoiding obstructions, local atmospheric conditions etc. The CMP (secured via S106) would need to reflect these monitoring locations as well as all the strongly recommended mitigation measures for medium risk schemes from the Mayor's Supporting Planning Guidance (SPG) - checklist in Appendix 7.
- 17.3 The applicant's air quality report identifies no exceedances of the national air quality objectives within the site. The proposal therefore meets relevant policy requirements and the site is considered suitable for residential development.

18 FLOODING AND DRAINAGE

- 18.1 Camden Local Plan policy CC3 seeks to ensure development does not increase flood risk and reduces the risk of flooding where possible. The NPPF requires

all major developments to include Sustainable Urban Drainage Systems (SuDs) unless demonstrated to be inappropriate (as set out in the Ministerial Statement by the Secretary of State on 18 December 2014). Major developments should achieve greenfield run-off rates wherever feasible and as a minimum 50% reduction in run off rates.

- 18.2 The application site is not in a local flood risk zone or a historically flooded street the Prince of Wales Road to the north was flooded in 2002; therefore, there is no increased surface water risk.
- 18.3 To support the application, the following has been submitted - surface water drainage statement; Camden-GLA pro forma; micro-drainage run-off (rates and volumes) calculations; evidence of Thames Water capacity; evidence of site surveys and investigations relating to drainage; details of flow routes for exceedance events; and a site specific SuDs lifetime maintenance plan.
- 18.4 The details have been assessed by the Council's Lead Local Flood Authority (LLFA). Overall, the proposed development has been designed to reduce the risk of flooding on the site and surrounding area, and to cope with being flooded. The LLFA has accepted the principle of the overall proposals and is satisfied that sufficient information has been submitted.

19. ACCESSIBILITY

- 19.1 Local Plan policy C6 (Access for all) promotes fair access and for barriers that prevent everyone from accessing facilities and opportunities to be removed. The need for all new development in London to achieve the highest standards of accessible and inclusive design is emphasised in policy GG3 (Creating a Healthy City) and policy D5 (Inclusive Design) of the London Plan.
- 19.2 Lift access would be provided to each of the floors above ground floor level in compliance with Part M of the Building Regulations Act and BS/EN 81-70 2018. Each flat has been designed to be wheelchair adaptable to meet M4(2) standards. 12 (10%) of the flats would be fully accessible under M4(3)(2)(b), including 9 x 2 bed apartments and the 3 x 3 bed houses under the London Affordable Rent tenure as the Council can assess the need of these larger wheelchair accessible units and allocate accordingly. A condition shall be attached subject to any subsequent approval securing these units as fully accessible.
- 19.3 Three 'blue badge' disabled parking bays would also be provided as a result of the scheme. Two would be located on Crogsland Road and one on Belmont Street.
- 19.4 On the basis of the above, and subject to the attached condition, the proposal is considered to improve accessibility levels across the site in compliance with policy C6 of the Camden Local Plan.

20. COMMUNITY SAFETY

- 20.1 Policy C5 of the Local Plan requires developments to demonstrate that they have incorporated design principles that contribute to community safety and security.
- 20.2 The Designing Out Crime Officer was consulted on this application and has been in discussions with the applicant team prior to the submission of the scheme. He has suggested further features in order for the applicant to achieve 'Secured by Design – Silver' accreditation. These have been sent separately to the applicant to consider in the future design. Regardless of these additional measures to achieve 'Secured by Design – Silver' accreditation, the proposal complies with policy C6 of the Camden Local Plan.

21. LAND CONTAMINATION

- 21.1 The application is supported by a Ground Condition Assessment with further information contained within the Design and Access Statement.
- 21.2 The Tier 1 risk assessment identified a number of possible pollutant linkages relating to human health, ground water and ecological receptors, and considered the whole site offers a low geo-environmental risk of contamination.
- 21.3 It was acknowledged that a site investigation and Tier 2 assessment would be required to confirm whether receptor risks are acceptably low or remedial measures are required. It is agreed this can be dealt with by planning condition, as such a condition has been recommended below to address this.
- 21.4 Section 3 (Radon) of the Ground Condition Assessment notes that the subject site is located in an area where <1% of the premises are above the Radon Action Level, therefore, as no basement excavation is proposed, no protection measures are required in the construction of dwellings at the site.
- 21.5 Based on the age of the application building it is possible that asbestos containing materials (ACMs) may have been used in construction and/or maintenance. A condition shall be secured to state that, if an up-to-date asbestos register is not available, an asbestos survey shall be undertaken so that any ACMs present can be managed accordingly to protect occupiers/construction workers.
- 21.6 The Council's Environmental Health (Contamination) Officer raised no objection to the proposed development in terms of land contamination/environmental health matters subject to a planning condition securing contamination details.

22. WASTE MANAGEMENT

- 22.1 Each property would have space for storage of waste and recycling, with bin stores in each of the three proposed blocks. Access to the stores within Blocks A and B would face on to Belmont Street, and access to the bin store within

Block C would be on to Crogsland Road (similarly to the entrances to each of the respective blocks).

- 22.2 The stores would be at ground level, accessed via secured doors with key fob access. On collection day, the waste collection vehicle would approach and access each refuse store via Belmont Street. Bins would be left in situ within the refuse stores until the waste collection vehicle arrives.
- 22.3 The internal waste storage areas are of a sufficient size and appropriate location to comfortably accommodate the waste and recycling bins required by the development. Further to this, the Delivery and Servicing Management Plan would be secured via legal agreement. As such, the proposal is considered to comply with policy CC5 (Waste) of the Camden Local Plan.

23. ECONOMIC BENEFITS, LOCAL EMPLOYMENT AND PROCUREMENT

- 23.1 Whilst no commercial floorspace is proposed, as a large-scale development, the proposed scheme has the potential to provide significant employment opportunities as part of the construction process. In line with para. 63 of the Employment Sites and Business Premises CPG, local employment and procurement obligations would be secured through a S106 agreement, to ensure that the job creation potential of the scheme benefits local people. This includes:

Construction phase:

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

commencing on site, as per section 63 of the Employment sites and business premises CPG.

- 23.2 The agent has confirmed a build cost of £24,553,000, meaning 8 construction apprentices (each with a £1,700 support fee) would be required as a result of this development.
- 23.3 Subject to the above being secured by S106, the proposal is considered to be acceptable in this regard.

24. HEALTH AND WELLBEING

- 24.1 Policy C1 of the Local Plan notes that the Council will improve and promote strong, vibrant and healthy communities through ensuring a high quality environment with local services to support health, social and cultural welling and reduce inequalities.
- 24.2 The application includes a Health Impact Assessment (HIA) that has been created and submitted in line with policy C1. The document contains a matrix assessing the proposal in 11 key areas which contribute towards the overall health of occupiers and visitors of the development, including access to social care, open space provision, safety and access to healthy foods. The proposal has considered these factors in the proposal, and is considered to comply with the Council's aims of promoting a high quality environment with local services to support health, social and cultural welling and reduce inequalities. On this basis, the proposal is considered to comply with the aims of policy C1 of the Camden Local Plan.

25. EQUALITY

Legislation

- 25.1 Section 149 of the Equality Act 2010 sets out the Public Sector Equality Duty (PSED). A public authority must, in the exercise of its functions, have due regard to the need to:
- a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
 - b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 25.2 Under the Equalities Act 2010 the nine protected characteristics covered by the general equality duty are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. People with common protected characteristics are often described as belonging to a protected group.

Consideration

- 25.3 As part of this application Officers have considered equalities impacts, particularly on groups with protected characteristics.
- 25.4 Overall, there is no existing lawful function or activity on the application site that would be significantly prejudiced or permanently lost by the proposed development. As established previously within this report, the community function of the CRRC has been largely decanted to the Greenwood Centre nearby, and would be re-provided within the adjacent site on Crogsland Road (now completed with occupancy expected April 2021). As such, the development itself would not introduce any specific function or feature that favours or disadvantages a specific grouping within the nine protected characteristics nor that discriminates against age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation and therefore a formal Equalities Impact Assessment has not been undertaken by the Council.
- 25.5 As discussed throughout other sections of this report, it is considered that none of the neighbouring occupiers would be unduly harmed or would be threatened by the development, either by the temporary construction works or ongoing use.

26. FIRE SAFETY

- 26.1 Policy D12 (Fire safety) of the London Plan requires all major development proposals to be submitted with a Fire Statement. The application has been supplemented with a Fire Statement.
- 26.2 The submission suitably addresses the requirements set out in policy D12 relating to means of escape and safety features. The London Fire Brigade was invited to comment on the details of this application (see consultation section of this report). No response was received, however the details are typically fully assessed under the Building Regulations 2010 Act. A formal Fire Strategy would therefore be prepared for approval through the Building Regulations process.
- 26.3 The application was submitted prior to full adoption of the London Plan and officers have taken a pragmatic view requiring that a condition shall be applied to any subsequent planning approval requiring a Fire Statement produced by an independent third party prior to the commencement of development. It would be required to detail the buildings construction methods, products, and materials used; the means of escape for all building users including those who are disabled or require level access together with the associated management plan; access for fire service personnel and equipment; ongoing maintenance and monitoring and how provision would be made within the site to enable fire appliances to gain access to the building. The submitted details would be assessed by the Council's Building Control department.

27. SECTION 106 OBLIGATIONS

- 27.1 As discussed in the previous sections of this report, the proposal would offer a generous package of obligations and contributions, details of which are outlined below:

Highways/transport

- **Car-free development** - Commitment to a car-free development for all land uses
- **Delivery and Servicing Management Plan**
- **Construction Management Plan (CMP)** - With CMP implementation support contribution of £22,816
- **Construction Impact Bond** - £30,000
- **Strategic Travel Plan** - With associated monitoring and measures contribution of £9,618
- **Pedestrian, Cycling and Environmental (PCE) Improvements contribution** - £113,000
- **Highways contribution** - £43,031.14

Housing

- **Affordable Housing** - 26 on site affordable homes (3 London affordable rent and 23 intermediate rent)

Design

- **Retention of Architect** - Throughout the construction period
- **Agent of Change** - Prospective tenants/purchasers made aware that the dwellings are located in an urban environment with particular noise conditions in respect of the existing warehousing (fish curing plant) to the south of the site

Environmental

- Sustainability measures to be secured through shadow S106 sustainability plan
- Water efficiency targets to be secured through shadow S106 sustainability plan
- Energy provisions to be secured through shadow S106 EE&RE plan:
 - Passive and efficiency measures in accordance with the proposed plans
 - CO2 reductions beyond Part L 2013 as amended, SAP10 factors:
 - minimum 71% on-site overall reduction;
 - minimum 16% Be Lean stage reduction through building efficiency;
 - minimum 65% Be Green stage reduction (reduction against the previous stage) through renewables
- Future-proofing details to be secured through shadow S106 clause:
 - to include adequate plant space for heat exchanger and pipework, soft points in plant room walls for connection to pipes, and a protected route for pipework to the most likely roadside on site boundary
- Carbon offset payment - £93,324

Public space and tree planting

- **Public open space contribution** - £642,870
- **Two street trees** to be planted adjacent to the site

Employment

- **Employment and Training Plan** - Local Employment, Local Procurement, Construction Apprentice Default Contribution, Construction Apprentice Support Contribution

28. COMMUNITY INFRASTRUCTURE LEVY (CIL)

- 28.1 Since 2012, all developments in London which result in the addition of over 100sq. m GIA floorspace (with some exceptions including affordable housing) have been eligible to pay Mayoral CIL. In February 2019 the Mayor adopted a new charging schedule (MCIL2). MCIL2 came into effect on 1 April 2019 and supersedes MCIL1 and the associated Crossrail Funding SPG.
- 28.2 An update to Camden's CIL charging schedule (and associated rates) was adopted on 30/10/2020. The CIL charge has increased for zone B residential schemes approved after 30/10/2020 from £250 per sq. m to £322 per sq. m.
- 28.3 The scheme has a proposed GIA of 9,226.1sq. m. Of the 9,226.1sq. m GIA, 1,185sq. m is community centre use, and 2,704sq. m is subject to social housing relief. This brings the chargeable total GIA to 5337.1sq. m GIA.

The CIL calculation for market housing is:

5337.1sq. m GIA x £322 (Camden, CIL2, Zone B) = £1,718,546.20
5337.1sq. m GIA x £80 per sqm GIA (MCIL2, Band 1) = £426,968.00
Sub-total = **£2,145,514**

The social housing relief:

2,704 sq. m GIA x £322 per sq. m GIA (Camden, CIL2, Zone B) =
£876,688.0
2704 sq. m GIA x £80 per sq. m GIA (MCIL2, Band 1) = £216,320.00
Sub-total = **£109,300.80**

- 28.4 As such the approximate CIL total would be £2,145,514 (subject to indexation) which would be liable for relief of £109,300.80.
- 28.5 Please note that the floor areas noted above are approximate and sums are indicative. Final payable contributions would be calculated following approval of the scheme by the Council's CIL Officers.

29. CONCLUSION

- 29.1 The application proposes a high standard of design that optimises the developable potential of this site providing a good, inclusive standard of amenity internal and external for future occupiers. It proposes a package of contributions that mitigate the impacts of additional residents in the area.

- 29.2 The existing resource centre has been relocated to the site opposite, which includes extra care affordable housing. When considering the two sites together, the proposals meet the Council's policy target of 50% affordable housing, which is particularly welcomed by officers.
- 29.3 The scheme causes some loss of amenity to existing occupiers surrounding and also proposes a mix for the private tenure that does not provide 3-bed units. However, on balance, the scheme is considered acceptable and any negative impact is outweighed by the public benefits.
- 29.4 Overall the proposed development is considered to benefit the area, and is therefore recommended for approval.

30. RECOMMENDATION

- 30.1 Planning permission is recommended subject to a S106 Legal Agreement and planning conditions (clauses and conditions set out below).
- 30.2 Draft heads of terms listed below, with more detail are included above:

Highways/transport

- **Car-free development** - Commitment to a car-free development for all land uses
- **Delivery and Servicing Management Plan**
- **Construction Management Plan (CMP)** - With CMP implementation support contribution of £22,816
- **Construction Impact Bond** - £30,000
- **Strategic Travel Plan** - With associated monitoring and measures contribution of £9,618
- **Pedestrian, Cycling and Environmental (PCE) Improvements contribution** - £113,000
- **Highways contribution** - £43,031.14

Housing

- **Affordable Housing** - 26 on site affordable homes (3 London affordable rent and 23 intermediate rent)

Design

- **Retention of Architect** - Throughout the construction period
- **Agent of Change** - Prospective tenants/purchasers made aware that the dwellings are located in an urban environment with particular noise conditions in respect of the existing warehousing (fish curing plant) to the south of the site

Environmental

- Sustainability measures to be secured through shadow S106 sustainability plan
- Water efficiency targets to be secured through shadow S106 sustainability plan

- Energy provisions to be secured through shadow S106 EE&RE plan:
 - Passive and efficiency measures in accordance with the proposed plans
 - CO2 reductions beyond Part L 2013 as amended, SAP10 factors:
 - minimum 71% on-site overall reduction;
 - minimum 16% Be Lean stage reduction through building efficiency;
 - minimum 65% Be Green stage reduction (reduction against the previous stage) through renewables
- Future-proofing details to be secured through shadow S106 clause:
 - to include adequate plant space for heat exchanger and pipework, soft points in plant room walls for connection to pipes, and a protected route for pipework to the most likely roadside on site boundary
- Carbon offset payment - £93,324

Public space

- **Public open space contribution** - £642,870

Employment

- **Employment and Training Plan** - Local Employment, Local Procurement, Construction Apprentice Default Contribution, Construction Apprentice Support Contribution

30 LEGAL COMMENTS

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

30.2 Conditions and Reasons:

1 Time Limit

The development hereby permitted must be begun not later than the end of three years from the date of this permission.

Reason: In order to encourage swift commencement and to comply with the provisions of Section 91 of the Town and Country Planning Act 1990 (as amended).

2 Approved Plans

The development hereby permitted shall be carried out in accordance with the following approved plans:

Existing Drawings:

CHA-HTA-A-0001 A, CHA-HTA-A-0010 B, CHA-HTA-A-0011 A.

Proposed Drawings:

CHA-HTA-A-0100 I, CHA-HTA-A-0101 H, CHA-HTA-A-0102 H, CHA-HTA-A-0103 H, CHA-HTA-A-0104 H, CHA-HTA-A-0105 H, CHA-HTA-A-0106 H, CHA-HTA-A-0107 H, CHA-HTA-A-0108 H, CHA-HTA-A-0109 H, CHA-HTA-A-0110 F, CHA-HTA-A-0111 E, CHA-HTA-A-0200, CHA-HTA-A-0201, CHA-HTA-A-0202 A, CHA-HTA-A-0251 B, CHA-HTA-A-0252 B, CHA-HTA-A-0253 A, CHA-HTA-A-0301, CHA-HTA-A-0302, CHA-HTA-A-0303, CHA-HTA-A-0304, CHA-HTA-A-0305, CHA-HTA-A-0306, CHA-HTA-A-0307, CHA-HTA-A-0308, CHA-HTA-A-0309, CHA-HTA-A-0310, CHA-HTA-A-0311, CHA-HTA-A-0312, CHA-HTA-A-0313, CHA-HTA-A-0314, CHA-HTA-A-0315, CHA-HTA-A-0316, CHA-HTA-A-0317, CHA-HTA-A-0318, CHA-HTA-A-0319, CHA-HTA-L-0905 A.

Supporting Documents:

Covering letter (Iceni) 29 October 2020, Air Quality Assessment Rev 02 (Stantec) February 2021, Arboricultural Impact Assessment (Vistry) October 2020, Preliminary Ecology Assessment (Vistry) October 2020, Contaminated Land Assessment (Vistry) October 2020, Internal Daylight, Sunlight & Overshadowing Assessments (Vistry) October 2020, Daylight and Sunlight Assessment Impacts on Neighbouring Properties (Vistry) October 2020, Energy Statement (Vistry) October 2020, Flood Risk Assessment and Drainage Report (Vistry) final v2 08/03/2021, Health Impact Assessment (Vistry) October 2020, Heritage, Townscape & Visual Assessment (Vistry) October 2020, Noise Impact Assessment (Vistry) October 2020, Planning Statement (Vistry) October 2020, Statement of Community Involvement (Vistry) October 2020, Sustainability Statement (Vistry) October 2020, Transport Assessment including a Travel Plan Rev E (Vistry) October 2020, Site Waste Management Plan (Vistry) October 2020, Construction/Demolition Management Plan Rev 0.1, Belmont Street Affordable Housing Proposal (hta) 13.05.20, Outline Fire Strategy CL5956/R1 Issue 1 (JGA) 30/04/2020, Design & Access Statement CHA-HTA-A-0700 (Vistry) October 2020, Accommodation Schedule (hta) 10.09.20.

Reason: For the avoidance of doubt and in the interest of proper planning.

3 Accessible Units

The ten fully accessible apartments shown on the plans hereby approved, shall be designed and constructed in accordance with Building Regulations Part M4 (3), with all other units being designed and constructed in accordance with Building Regulations Part M4 (2).

Reason: To ensure that the internal layout of the building provides flexibility for the accessibility of future occupiers and their changing needs over time, in accordance with the requirements of policy C6 of the London Borough of Camden Local Plan 2017.

4 Construction Machinery

All non-Road mobile Machinery (any mobile machine, item of transportable industrial equipment, or vehicle - with or without bodywork) of net power between 37kW and 560kW used on the site for the entirety of the demolition and construction phase of the development hereby approved shall be required to meet Stage IIIA of EU Directive 97/68/EC. The site shall be registered on the NRMM register for the demolition and construction phase of the development.

Reason: To safeguard the amenities of the adjoining occupiers, the area generally and contribution of developments to the air quality of the borough in accordance with the requirements of Policies A1, A4 and CC4 of the Camden Local Plan 2017.

5 Fire Strategy

No above ground new development (i.e. on new building or extension) shall commence on each building until a Fire Statement for the relevant Phase has been submitted to and approved in writing by the Local Planning Authority. The Fire Statement shall be produced by an independent third party suitably qualified assessor which shall detail the building's construction, methods, products and materials used; the means of escape for all building users including those who are disabled or require level access together with the associated management plan; access for fire service personnel and equipment; ongoing maintenance and monitoring and how provision will be made within the site to enable fire appliances to gain access to the building. The relevant Phase of the development shall be carried out in accordance with the approved details.

Reason: In order to provide a safe and secure development in accordance with policy CP3 of the Core Strategy and policy D12 of the London Plan 2021.

6 Details, Materials and Samples

Prior to commencement of the above completion of superstructure, detailed drawings, or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the local planning authority:

- a) Details including sections at 1:20 of all windows (including jambs, head and cill), ventilation grilles, external doors, gates and canopies.
- b) Plan, elevation and section drawings, of all ground floor facades at a scale of 1:20.
- c) Manufacturer's specification details of all facing materials (to be submitted to the Local Planning Authority), samples (to be provided on site or at the architects' office), and hand sample panels of those materials (to be provided on site).
- d) Details of all plant equipment and any necessary screening.
- e) Details of all bollards (including moveable ones and their means of control /management), gates, fences or other means of enclosure which form part of the public realm.

The relevant part of the works shall be carried out in accordance with the details thus approved and all approved samples shall be retained on site during the course of the works.

Reason: In order to safeguard the special architectural and historic interest of the proposed retained buildings and to safeguard the character and appearance of the wider area in accordance with the requirements of policies D1 and D2 of the Camden Local Plan 2017.

7 External Fixtures/Building Services

No lights, meter boxes, flues, vents or pipes, and no telecommunications equipment, alarm boxes, television aerials or satellite dishes shall be fixed or installed on the external face of the buildings.

Reason: In order to safeguard the special architectural and historic interest of the retained buildings and to safeguard the character and appearance of the wider area in accordance with the requirements of policies D1 and D2 of the Camden Local Plan 2017.

8 Cycle Storage

Prior to the commencement of the relevant part of the development, full details of the cycle storage areas for the 174 long stay and 5 short stay cycle spaces shall be submitted to and approved in writing by the local planning authority. The details shall include access doors with a minimum width of 1.2m. The approved facilities shall thereafter be provided in their entirety prior to the first occupation of any of the new units, and permanently retained thereafter.

Reason: To ensure the development provides adequate cycle parking facilities in accordance with the requirements of policy T1 of the London Borough of Camden Local Plan 2017.

9 Obscure Glazing

The north facing living/kitchen/dining area windows of flat nos. C-91, C-99 & C-107 as shown on the approved plans (Block C flats at first, second and third floors facing towards Block 1 of the Denton Estate) shall be obscure glazed and non-opening to an internal height of 1.7m in perpetuity.

Reason: To safeguard the privacy of the occupiers of Block 1 of the Denton Estate in accordance with the requirements of Policy A1 of the Camden Local Plan 2017.

10 Piling

No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling shall be undertaken in accordance with the terms of the approved piling method statement.

Reason: To safeguard the existing public sewer infrastructure, controlled waters and the structural stability of the neighbouring structures, in accordance with the requirements of policies A5 and CC3 of the London Borough of Camden Local Plan 2017.

11 Land Contamination

Prior to the commencement of work for each section of the development or stage in the development as may be agreed in writing by the Local Planning Authority (LPA) a scheme including the following components to address the risk associated with site contamination shall be submitted to and approved in writing by the LPA.

- A) A site investigation scheme based on the Phase 1 Ground Condition Assessment (Ref: 43006/3501/R001/Rev01), by Stantec UK Ltd to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site;
- B) The results of the investigation and detailed risk assessment referred to in (a) and, based on these, in the event that remediation measures are identified necessary, a remediation strategy giving full details of the remediation measures required and how they are to be undertaken;
- C) A verification plan demonstrating the works set out in the remediation strategy have been undertaken.

Any investigation and risk assessment must be undertaken in accordance with the Environment Agency's Land Contamination Risk Management (LCRM) which replaced CLR11. In the event that additional significant contamination is found at any time when carrying out the approved development it must be reported immediately to the LPA.

Reason: To ensure the risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors, in accordance with policies G1, D1, A1, and DM1 of the London Borough of Camden Local Plan 2017.

12 Environmental health - Noise

The design of the development shall be as specified in submitted 'Stantec acoustic submission, Ref: 43006/3001', dated August 2020. Approved details and acoustic mitigation shall be implemented prior to occupation of the development and thereafter be permanently retained.

Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.

13 Environmental health - Noise levels

The external noise level emitted from plant, machinery or equipment at the development hereby approved shall be lower than the typical background noise level by at least 10dBA, by 15dBA where the source is tonal, as assessed according to BS4142:2014 at the nearest and/or most affected noise sensitive premises, with all machinery operating together at maximum capacity.

Reason: To safeguard the amenities of neighbouring noise sensitive receptors in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.

14 Plant Anti-vibration Isolators

Prior to use, plant at the development shall be mounted with proprietary anti-vibration isolators and fan motors shall be vibration isolated from the casing and adequately silenced and maintained as such.

Reason: To safeguard the amenities of neighbouring noise sensitive receptors in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.

15 Internal Noise Levels

The internal noise levels in the dwellings hereby approved shall not exceed an indoor ambient noise levels in unoccupied rooms of 35dB(A) LAeq,8 hour (07:00-23:00 hours) and 30dB(A) LAeq, 16hour (23:00-07:00 hours) and individual noise events shall not normally exceed 45dB LAm_{ax} based on ten occurrences during the night (23:00-07:00 hours). Prior to first occupation of the development hereby approved, noise testing and an associated report to demonstrate compliance with the above levels shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.

16 Detailed Landscape Plan

Notwithstanding the details shown on the plans, full details of hard and soft landscaping shall be submitted to and approved in writing by the local planning authority prior to the commencement of the relevant part of the development.

The submission shall include details of:

- a) full details of all open spaces, terraces and routes
- c) planters including sections, materials and finishes and planting schedules
- d) final location details of 12 trees, including trees within the footpath to the north of the site, with accompanying evidence that all locations have been investigated to ensure planting is viable and takes sufficient account of the proximity of local highway and underground infrastructure;

- f) details of all boundary treatments to the site
- g) a maintenance plan for a minimum of 3 years
- h) irrigation
- i) sectional drawings of all planting areas

A landscape management plan shall also be submitted to demonstrate that appropriate maintenance, cleaning and watering tasks have been accounted for as part of the overall package of facilities management.

The relevant part of the works shall not be carried out otherwise than in accordance with the details thus approved.

Any trees or areas of planting which, within a period of 5 years from the completion of the development, die, are removed or become seriously damaged or diseased, shall be replaced as soon as is reasonably possible and, in any case, by not later than the end of the following planting season, with others of similar size and species, unless the Council gives written consent to any variation.

The development shall not be occupied until such time as the works have been completed in accordance with the details thus approved.

Reason: To enable the Council to ensure a reasonable standard of amenity in the scheme in accordance with the requirements of policies D1, D2, A1 and A3 of the Camden Local Plan 2017.

17 Green roof

Prior to completion of superstructure, full details in respect of the green roof in the areas indicated on the approved roof plan shall be submitted to and approved by the local planning authority. Details of the green roof provided shall include: species, planting density, substrate and a section at scale 1:20 showing that adequate depth is available in terms of the construction and long term viability of the green roof, as well as details of the maintenance programme for green roof. The buildings shall not be occupied until the approved details have been implemented and these works shall be permanently retained and maintained thereafter.

Reason: In order to ensure the development undertakes reasonable measures to take account of biodiversity and the water environment in accordance with policies A3, CC2 and CC3 of the London Borough of Camden Local Plan policies.

18 Photovoltaic Panels

Prior to completion of superstructure, drawings and data sheets showing the locations, extent and predicted energy generation of photovoltaic cells and associated equipment to be installed on the building shall have been submitted to and approved by the Local Planning Authority in writing. The measures shall include the installation of a meter to monitor the energy output from the approved renewable energy systems. A site-specific lifetime maintenance schedule for each system, including safe roof access arrangements, shall be provided. The cells shall be installed in full accordance with the details approved by the Local Planning Authority and permanently retained and maintained thereafter.

Reason: To ensure the development provides adequate on-site renewable energy facilities in accordance with the requirements of policy CC1 (Climate change mitigation) of the London Borough of Camden Local Plan 2017.

19 Air Source Heat Pump details

Prior to completion of superstructure, details, drawings and data sheets of the air source heat pumps and associated equipment to be installed on the building, shall have been submitted to and approved by the Local Planning Authority in writing. The measures shall include the installation of a meter to monitor the energy output from the approved renewable energy systems. Details should include:

- Equipment locations
- System Seasonal Performance Factor of at least 2.5
- Product Coefficient of Performance of at least 3.19
- Be Green stage carbon saving in line with the approved plans

A site-specific lifetime maintenance schedule for each system, including safe access arrangements, shall be provided. The equipment shall be installed in full accordance with the details approved by the Local Planning Authority and permanently retained and maintained thereafter.

Reason: To ensure the development provides adequate on-site renewable energy facilities in accordance with the requirements of policy CC1 (Climate change mitigation) of the London Borough of Camden Local Plan 2017.

20 Maximum Internal Water use

The development hereby approved shall achieve a maximum internal water use of 110litres/person/day. The dwelling/s shall not be occupied until the Building Regulation optional requirement has been complied with.

Reason: To ensure the development contributes to minimising the need for further water infrastructure in an area of water stress in accordance with Policies CC1, CC2, CC3 of the London Borough of Camden Local Plan 2017.

21 Drop-box Details

Notwithstanding the details shown on the plans hereby approved, prior to the first occupation of any of the flats, full details of the on-site automated courier drop-boxes shall be submitted to and approved in writing by the local planning authority. The drop-boxes shall be retained thereafter in perpetuity.

Reason: To reduce dwell time for couriers and associated parking stress in compliance with policy T4 of the London Borough of Camden Local Plan 2017.

22 Construction related impacts - Monitoring

Air quality monitoring should be implemented on site. No development shall take place until

- a. prior to installing monitors, full details of the air quality monitors have been submitted to and approved by the local planning authority in writing. Such details shall include the location, number and specification of the monitors, including evidence of the fact that they will be installed in line with guidance outlined in the GLA's Control of Dust and Emissions during Construction and Demolition Supplementary Planning Guidance;
- b. prior to commencement, evidence has been submitted demonstrating that the monitors have been in place for at least 3 months prior to the proposed implementation date.

The monitors shall be retained and maintained on site for the duration of the development in accordance with the details thus approved.

Reason: To safeguard the amenity of adjoining premises and the area generally in accordance with the requirements of policies A1 and CC4 of the London Borough of Camden Local Plan Policies.

23 Biodiversity – Bird and Bat Boxes

Prior to first occupation of the development a plan showing details of bird and bat box locations and types and indication of species to be accommodated shall be submitted to and approved in writing by the local planning authority. The boxes shall be installed in accordance with the approved plans prior to the occupation of the development and thereafter retained.

Reason: In order to secure appropriate features to conserve and enhance wildlife habitats and biodiversity measures within the development, in accordance with the requirements of the London Plan 2021 and Policies A3 and CC2 of the London Borough of Camden Local Plan 2017.

24 **Sustainability and energy

On or prior to the Implementation Date a sustainability plan and an energy plan shall be submitted to and approved in writing by the local planning authority. Such plans shall demonstrate:

- o Energy strategy and measures as per approved Energy Statement or better
- o Sustainability measures as per the approved Sustainability Statement
- o Water efficiency as per the approved documents
- o Overall minimum CO2 reductions beyond Part L 2013 as amended, SAP10 factors:

- 71% on-site overall reduction, minimum 16% Be Lean stage reduction through building efficiency, minimum 65% Be Green stage reduction (reduction against the previous stage) through renewables

Reason: To ensure the proposal is energy efficient and sustainable in accordance with policies CC1, CC2 and CC3 of the London Borough of Camden Local Plan policies.

25 ** Employment and Training Plan

Prior to commencement the applicant and/or developer shall submit an Employment and Training Plan for approval to the Local Planning Authority, containing details of Local Employment, Local Procurement, and confirmation of measures to provide Construction Apprentice Default Contribution, Construction Apprentice Support Contribution

Reason: To ensure the development provides sufficient employment and training in line with the requirements of policy E1 of the Camden Local Plan 2017.

26 **Future-proofing

The development shall be constructed with adequate plant space for heat exchanger and pipework, soft points in plant room walls for connection to pipes, and a protected route for pipework to the most likely roadside on site boundary.

Reason: To ensure the proposal is energy efficient and sustainable in accordance with policies CC1, CC2 and CC3 of the London Borough of Camden Local Plan policies.

27 **Quantum of housing

The development hereby approved shall provide 115 units including 26 affordable housing (23 intermediate and 3 London affordable rent) units.

Reason: For the avoidance of doubt and in the interest of proper planning.

28 ** Car free

The proposed dwellings will be car free.

Reason: In order to protect the pedestrian environment and the amenities of the area generally and to ensure the continued free flow of traffic in the area in accordance with policies T1, T2 and T3 of the Camden Local Plan 2017.

29 ** CMP

Prior to commencement of development, a Construction Management Plan (CMP) including an Air Quality Assessment) shall be submitted to and approved by the local planning authority.

The CMP shall set out all measures that the Owner will adopt in undertaking the demolition of the existing buildings and the construction of the Development using good site practices in accordance with the Council's Considerate Contractor Manual.

Such plan shall include measures for ensuring highway safety and managing transport, deliveries and waste (including recycling of materials) throughout the demolition and construction periods and which demonstrates consideration of and liaison with other local concurrent developments. The plan shall also include details of a community working group involving local residents and businesses, a contractor complaints/call-line and measures to be carried out to mitigate the impact of the noise arising from construction and demolition activities on local residents and businesses, a waste management strategy and means of monitoring and reviewing the plan from time to time.

The measures contained in the Construction Management Plan shall at all times remain implemented during all works of construction and demolition. Where separate Construction Management Plans are submitted for the demolition and the construction phases the provisions of this condition will apply to both plans.

Reason: In order to protect the pedestrian environment and the amenities of the area generally and to ensure the continued free flow of traffic in the area in accordance with policies T1, T2 and T3 of the Camden Local Plan 2017.

30 ****CMP monitoring fee**

On or prior to Implementation, confirmation that the necessary measures for the provision monitoring the CMP shall be submitted to and approved in writing by the Local Planning Authority.

Reason: In order to protect the pedestrian environment and the amenities of the area generally and to ensure the continued free flow of traffic in the area in accordance with policies T1, T2 and T3 of the Camden Local Plan 2017.

31 ****CMP bond**

On or prior to Implementation, confirmation that the necessary measures for a bond for the CMP shall be submitted to and approved in writing by the Local Planning Authority.

Reason: In order to protect the pedestrian environment and the amenities of the area generally and to ensure the continued free flow of traffic in the area in accordance with policies T1, T2 and T3 of the Camden Local Plan 2017.

32 ****Delivery and Servicing Management Plan**

Prior to commencement of development, a Delivery and Servicing Management Plan shall be submitted to and approved by the local planning authority.

Reason: In order to protect the pedestrian environment and the amenities of the area generally and to ensure the continued free flow of traffic in the area in accordance with policies T1, T2 and T3 of the Camden Local Plan 2017.

33 ****Strategic Travel Plan**

Prior to commencement of development, a Strategic Travel Plan shall be submitted to and approved by the local planning authority.

Reason: In order to protect the pedestrian environment and the amenities of the area generally and to ensure the continued free flow of traffic in the area in accordance with policies T1, T2 and T3 of the Camden Local Plan 2017.

34 ****Strategic Travel Plan - monitoring contribution**

Prior to commencement of development, , confirmation that the necessary measures for monitoring the Strategic Travel Plan shall be submitted to and approved in writing by the Local Planning Authority.

Reason: In order to protect the pedestrian environment and the amenities of the area generally and to ensure the continued free flow of traffic in the area in accordance with policies T1, T2 and T3 of the Camden Local Plan 2017.

35 **** Pedestrian, cycle and environmental improvements contribution**

On or prior to Implementation, confirmation that the necessary measures for the provision of highways, pedestrian, cycling, environmental and public realm improvements in the vicinity of the Development shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that the pedestrian environment and public realm is maintained and improved in accordance with policies T1, T2 and T3 of the Camden Local Plan 2017.

36 **** Highways contribution**

On or prior to Implementation, confirmation that the necessary measures for the provision of highways, pedestrian, cycling, environmental and public realm improvements in the vicinity of the Development shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that the pedestrian environment and public realm is maintained and improved in accordance with policies T1, T2 and T3 of the Camden Local Plan 2017.

37 **** Retention of Architect**

The architect employed for the application shall be retained throughout the construction period.

Reason: In order to safeguard the special architectural and historic interest of the proposed retained buildings and to safeguard the character and appearance of the wider area in accordance with the requirements of policies D1 and D2 of the Camden Local Plan 2017.

38 **** Agent of Change**

Prospective tenants/purchasers shall be made aware that the dwellings are located in an urban environment with particular noise conditions in respect of the existing warehousing (fish curing plant) to the south of the site.

Reason: To protect the ongoing operations of the local fish curing plant in accordance with policy E1 of the Camden Local Plan 2017.

39 ****Public Open Space**

On or prior to Implementation, confirmation that the necessary measures for the provision of public open space contribution shall be submitted to and approved by the Local Planning Authority.

Reason: To ensure that the public open space is maintained and improved in accordance with policies A2 and A3 of the Camden Local Plan 2017.

40 ****Street Trees**

On or prior to Implementation, confirmation that the necessary measures for the provision of two new street trees, including measures for maintenance shall be submitted to and approved by the Local Planning Authority.

Reason: To ensure that the public open space is maintained and improved in accordance with policies A2 and A3 of the Camden Local Plan 2017.

41 ****Need for a legal agreement**

In the event that any owners of the land have the legal locus to enter into a Section 106 Agreement no works shall be commenced on site until such time as they have entered into such an Agreement incorporating obligations in respect of the matters covered by conditions marked with ** in the planning permission granted at the planning committee on 25 March 2021 and those obligations shall apply to all conditions above marked with **.

Reason: In order to define the permission and to secure development in accordance with the Camden Local Plan.

30.3 **Informatives:**

- 1 Your proposals may be subject to control under the Building Regulations and/or the London Buildings Acts that cover aspects including fire and emergency escape, access and facilities for people with disabilities and sound insulation between dwellings. You are advised to consult the Council's Building Control Service, Camden Town Hall, Judd St, Kings Cross, London NW1 2QS (tel: 020-7974 6941).
- 2 Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. You are advised to consult the Council's Noise and Licensing Enforcement Team, Camden Town Hall, Judd St, Kings Cross, London NW1 2QS (Tel. No. 020 7974 4444 or search for 'environmental health' on the Camden website or seek prior approval under Section 61 of the Act if you anticipate any difficulty in carrying out construction other than within the hours stated above.
- 3 This proposal may be liable for the Mayor of London's Community Infrastructure Levy (CIL) and the Camden CIL. Both CILs are collected by Camden Council after a liable scheme has started, and could be subject to surcharges for failure to assume liability or submit a commencement notice PRIOR to commencement. We issue formal CIL liability notices setting out how much you may have to pay once a liable party has been established. CIL payments will be subject to indexation in line with construction costs index. You can visit our planning website at www.camden.gov.uk/cil for more information, including guidance on your liability, charges, how to pay and who to contact for more advice.
- 4 Your proposals may be subject to control under the Party Wall Act 1996 which covers party wall matters, boundary walls and excavations near neighbouring buildings. You are advised to consult a suitably qualified and experienced Building Engineer.
- 5 Your attention is drawn to the need for compliance with the requirements of the Environmental Health regulations, Compliance and Enforcement team, [Regulatory Services] Camden Town Hall, Argyle Street, WC1H 8EQ, (telephone: 020 7974 4444) particularly in respect of arrangements for ventilation and the extraction of cooking fumes and smells.

- 6 You are reminded that filled refuse sacks shall not be deposited on the public footpath, or forecourt area until within half an hour of usual collection times. For further information please contact the Council's Environment Services (Rubbish Collection) on 020 7974 6914/5 or on the website <http://www.camden.gov.uk/ccm/content/contacts/council-contacts/environment/contact-street-environment-services.en>.
- 7 Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.
- 8 In relation to living roofs it is recommended for the proposed substrate to be sourced from site (for example: soil and crushed brick) for sustainability reasons and to provide better conditions for local species.
- 9 You are advised the developer and appointed/potential contractors should take the Council's guidance on Construction Management Plans (CMP) into consideration prior to finalising work programmes and must submit the plan using the Council's CMP pro-forma; this is available on the Council's website at <https://beta.camden.gov.uk/web/guest/construction-management-plans> or contact the Council's Planning Obligations Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (telephone: 020 7974 4444). No development works can start on site until the CMP obligation has been discharged by the Council and failure to supply the relevant information may mean the council cannot accept the submission as valid, causing delays to scheme implementation. Sufficient time should be afforded in work plans to allow for public liaison, revisions of CMPs and approval by the Council.
- 10 This consent is without prejudice to, and shall not be construed as derogating from, any of the rights, powers, and duties of the Council pursuant to any of its statutory functions or in any other capacity and, in particular, shall not restrict the Council from exercising any of its powers or duties under the Highways Act 1980 (as amended). In particular your attention is drawn to the need to obtain permission for any part of the structure which overhangs the public highway (including footway). Permission should be sought from the Council's Engineering Service Network Management Team, Town Hall, Argyle Street WC1H 8EQ, (tel: 020 7974 2410) or email highwayengineering@camden.gov.uk.
- 11 This approval does not authorise the use of the public highway. Any requirement to use the public highway, such as for hoardings, temporary road closures and suspension of parking bays, will be subject to approval of relevant licence from the Council's Streetworks Authorisations & Compliance Team London Borough of Camden 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No 020 7974 4444). Licences and authorisations need to be sought in advance of proposed works. Where development is subject to a Construction Management Plan (through a requirement in a S106 agreement), no licence or authorisation will be granted until the Construction Management Plan is approved by the Council.

- 12 You are advised that any works of alterations or upgrading not included on the approved drawings which are required to satisfy Building Regulations or Fire Certification may require a further application for listed building consent.

- 13 You must carry out any building work which can be heard at the boundary of the site only:

between 08.00 and 18.00 Monday to Friday;
between 08.00 and 13.00 on Saturday; and
not at all on Sundays, bank holidays and public holidays.

Noisy work must not take place outside these hours.
You must carry out basement excavation work only:
between 08.00 and 18.00 Monday to Friday; and
not at all on Saturdays, Sundays, bank holidays and public holidays.

All demolition and construction work are to be carried out under a Control of Pollution Act 1974, Section 61 consent.

- 14 Your attention is drawn to the fact that there is a separate legal agreement with the Council which relates to the development for which this permission is granted. Information/drawings relating to the discharge of matters covered by the Heads of Terms of the legal agreement should be marked for the attention of the Planning Obligations Officer, Sites Team, Camden Town Hall, Argyle Street, WC1H 8EQ.

- 15 This proposal may be liable for the Mayor of London's Community Infrastructure Levy (CIL) and the Camden CIL. Both CILs are collected by Camden Council after a liable scheme has started, and could be subject to surcharges for failure to assume liability or submit a commencement notice PRIOR to commencement. We issue formal CIL liability notices setting out how much you may have to pay once a liable party has been established. CIL payments will be subject to indexation in line with construction costs index. You can visit our planning website at www.camden.gov.uk/cil for more information, including guidance on your liability, charges, how to pay and who to contact for more advice.

- 16 The matters covered by conditions marked with an ** are matters which would usually be incorporated into a Section 106 Agreement. On Council own schemes because the Council cannot enter into an agreement with itself the usual practice would for the permission to reference the Section 106 requirements for information. If the Council retains ownership of the application site although the reference to Section 106 requirements would not be legally binding they would act as a record of the requirements the Council as planning authority expects the Council as landowner to comply with. If the Council disposes of a relevant interest in the Application Site (which for the avoidance of doubt will not include disposals to individual tenants and occupiers) the incoming owner will be required to enter into a Section 106 giving effect to those requirements which will then become a legally binding document.

- 17 Construction related impacts - Mitigation

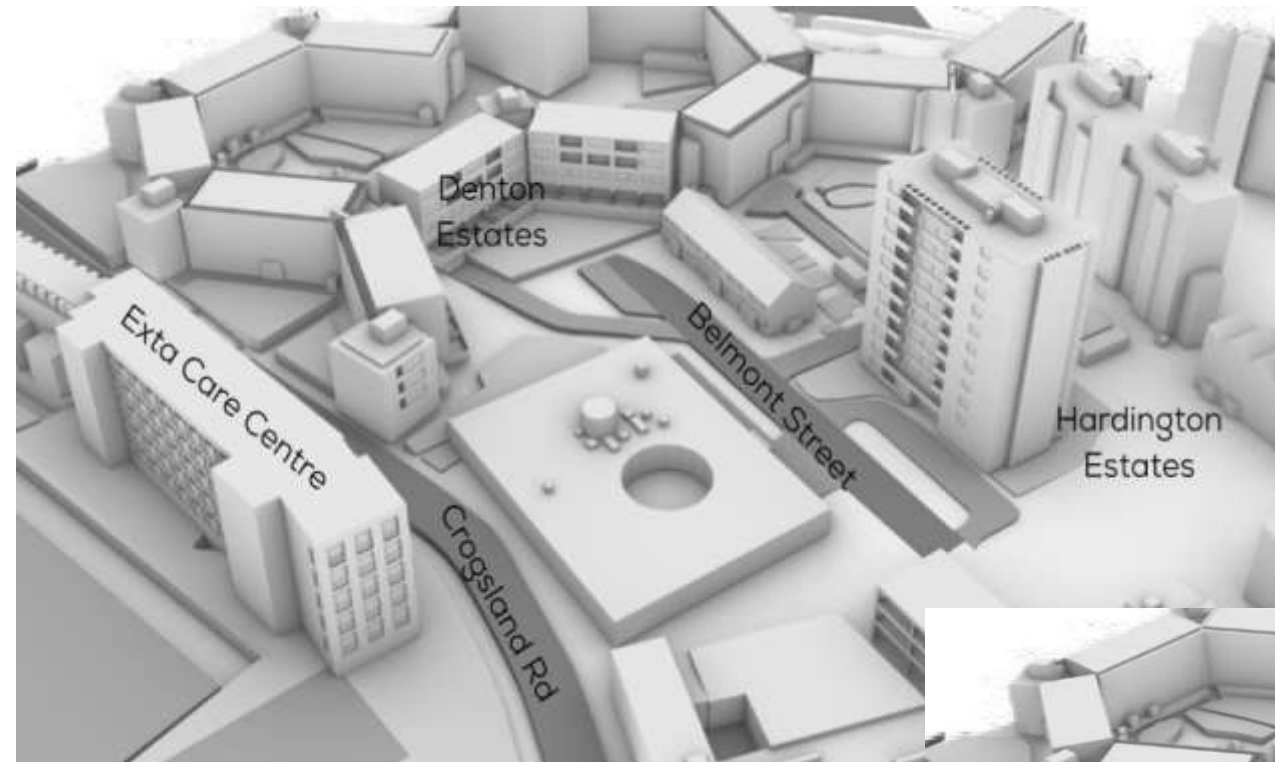
Mitigation measures to control construction-related air quality impacts should be secured within the Construction Management Plan as per the standard CMP Pro-Forma and any comments from the AQ Officer at the time. The applicant will be required to complete the Mayor's SPG Appendix 7 checklist and demonstrate that all mitigation measures relevant to the Medium level of identified risk are committed.



















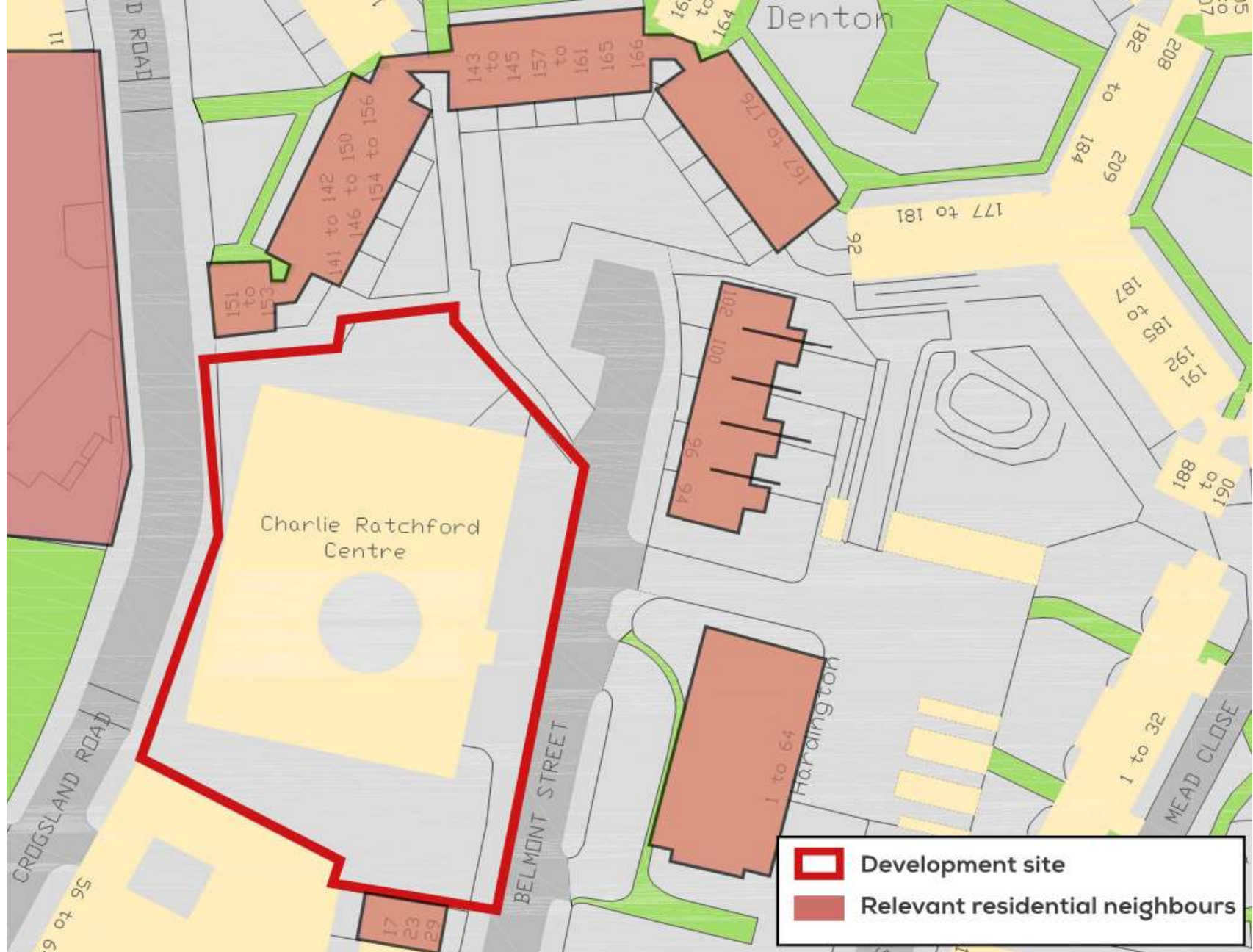
Proposed

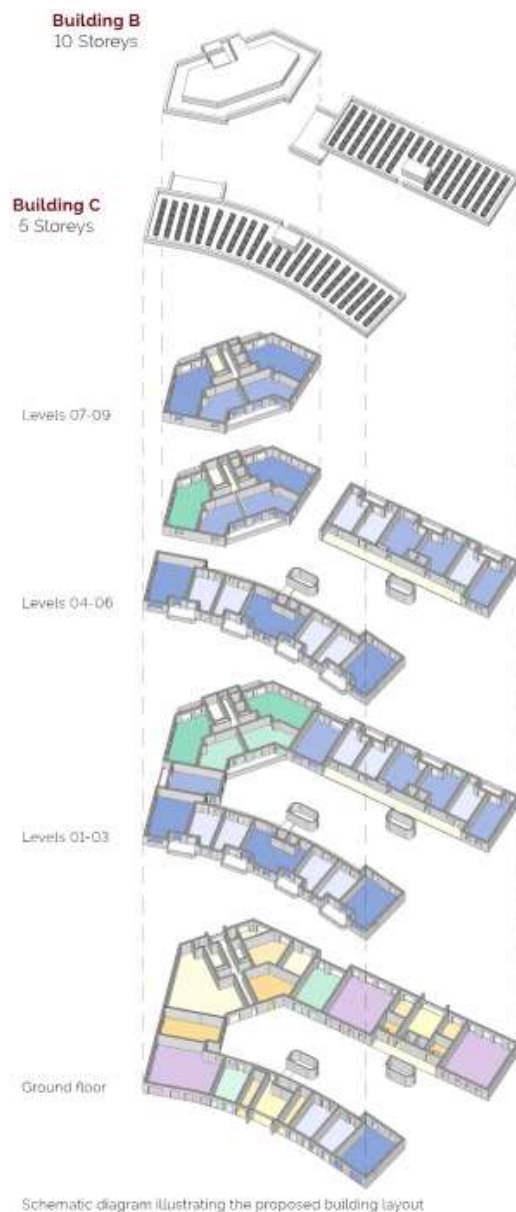


Existing view southwards
along Crogsland Road



Proposed view southwards
along Crogsland Road

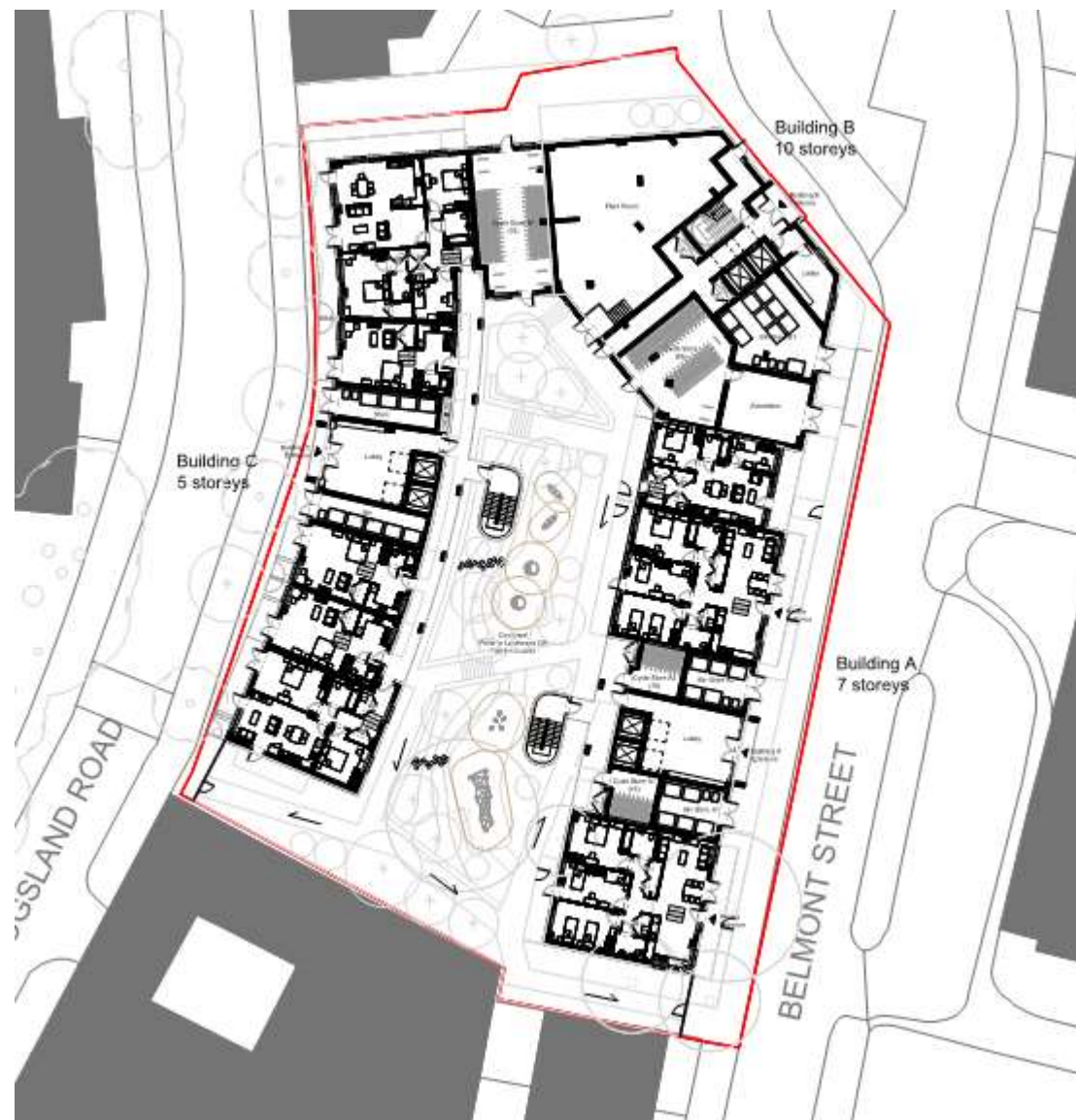


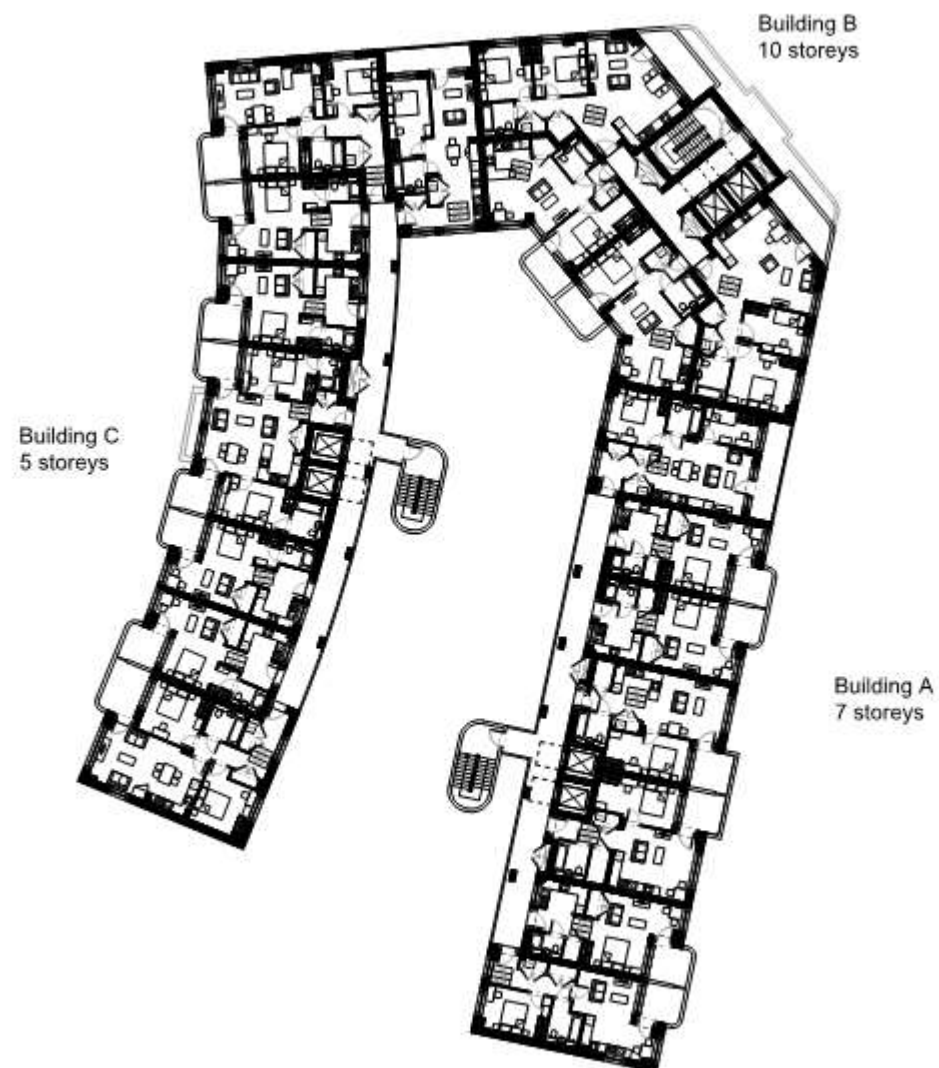
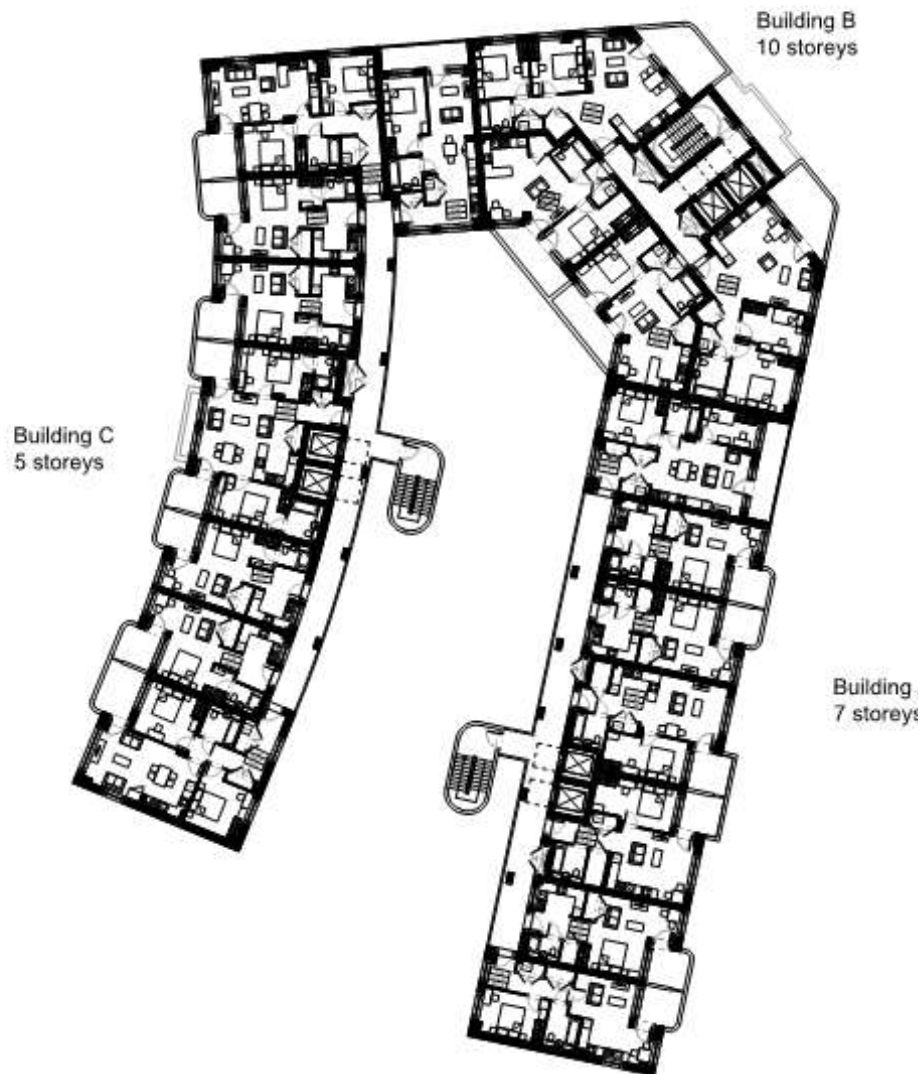


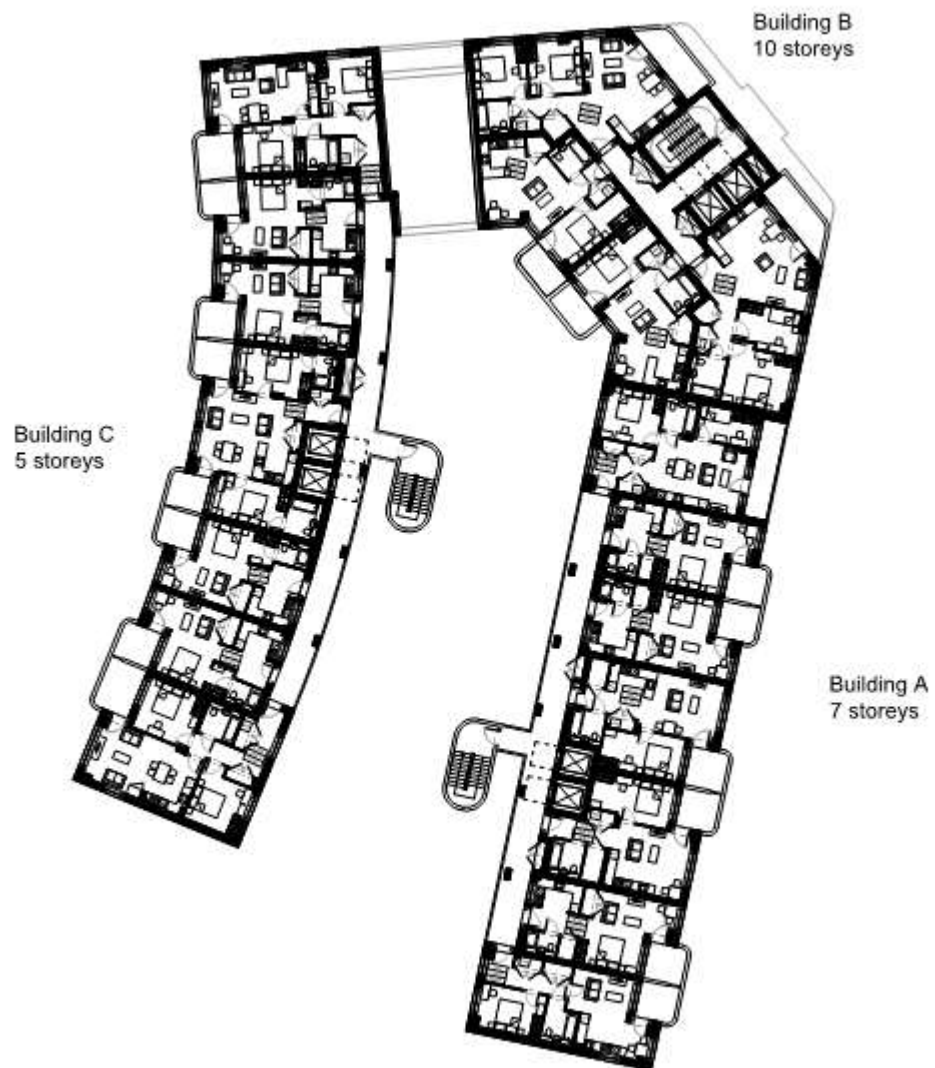
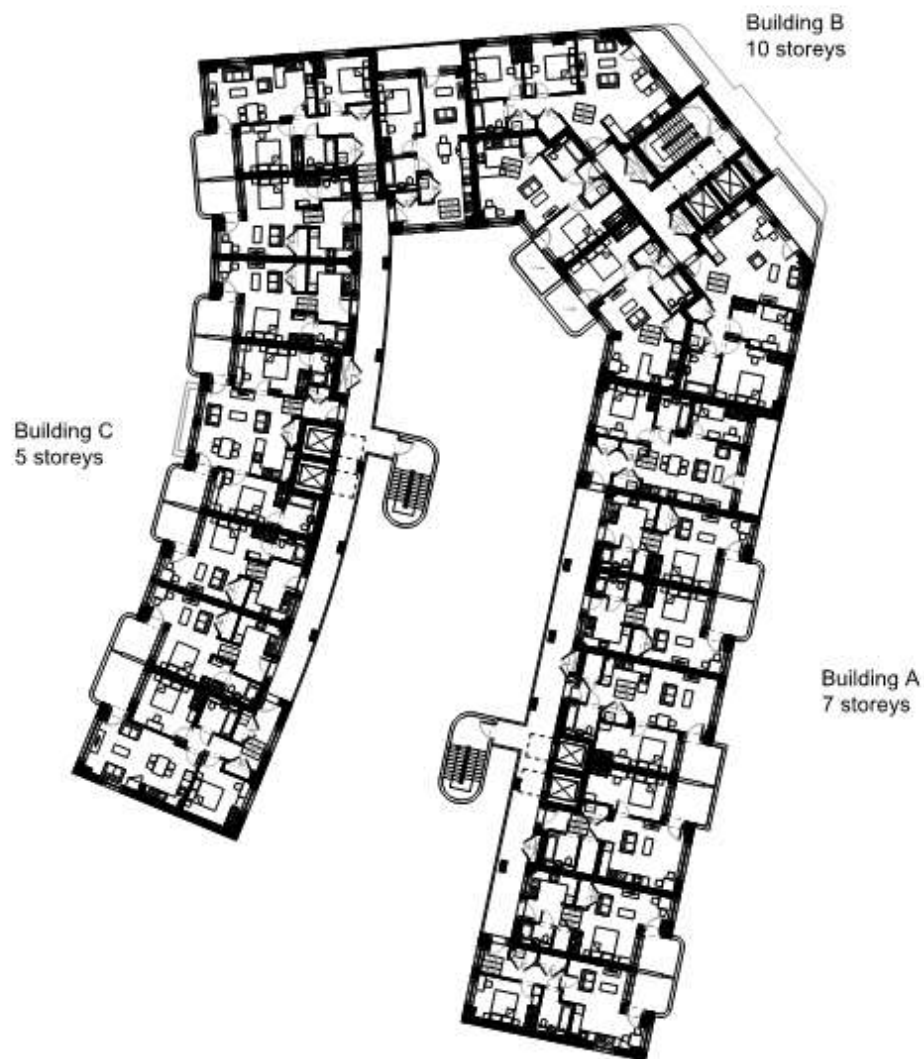
Building A
7 Storeys

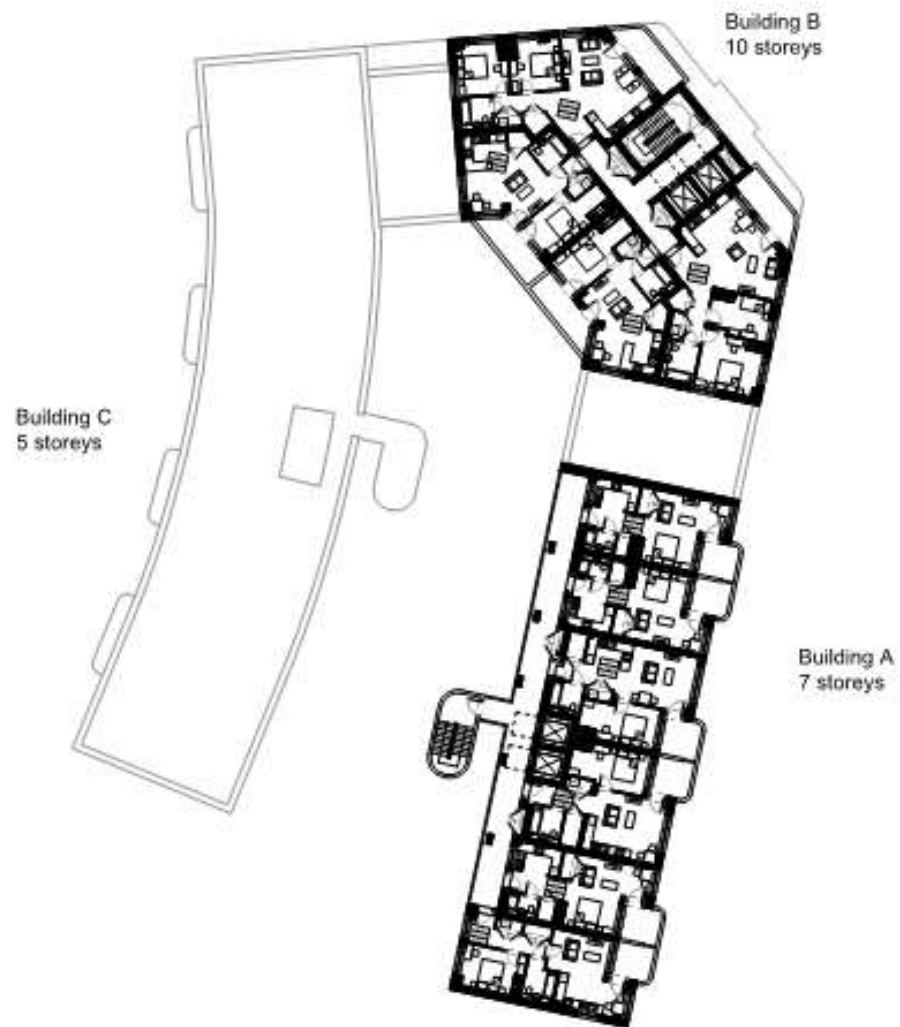
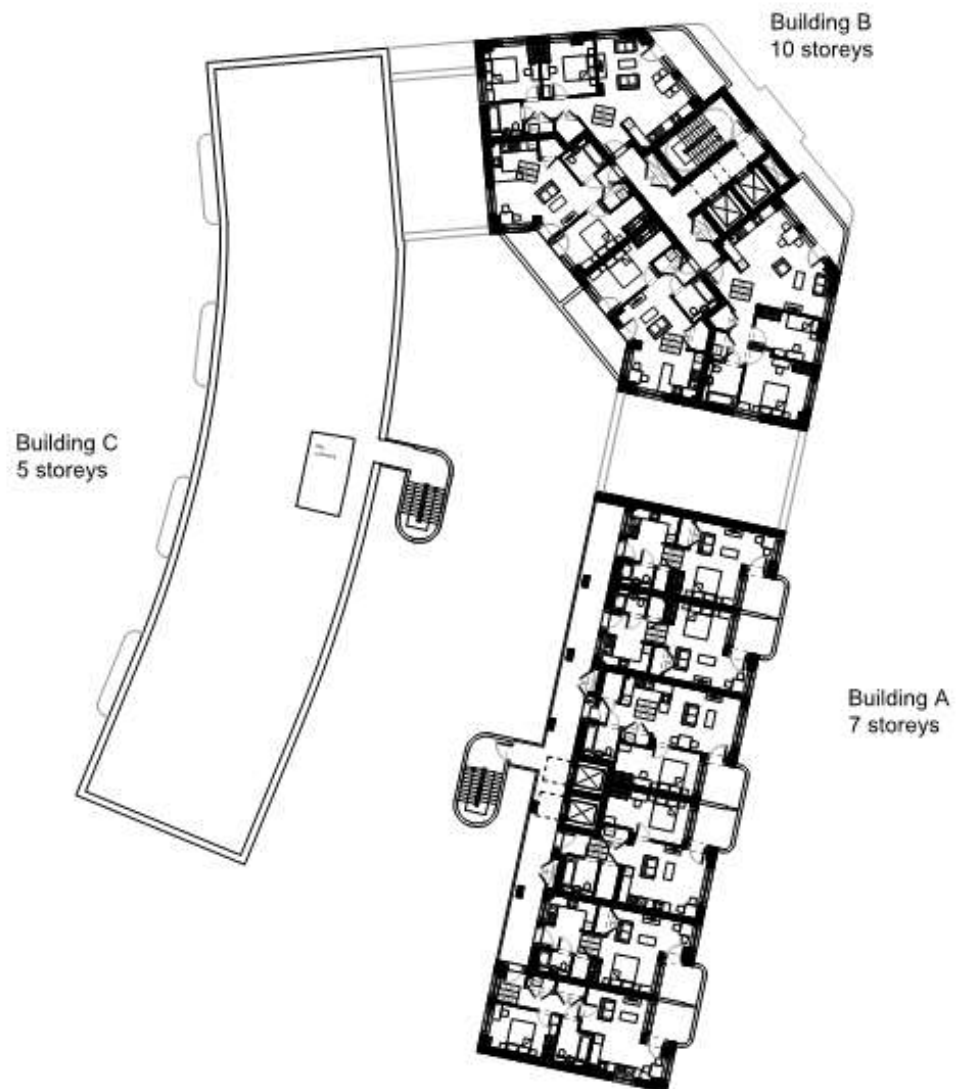
Key

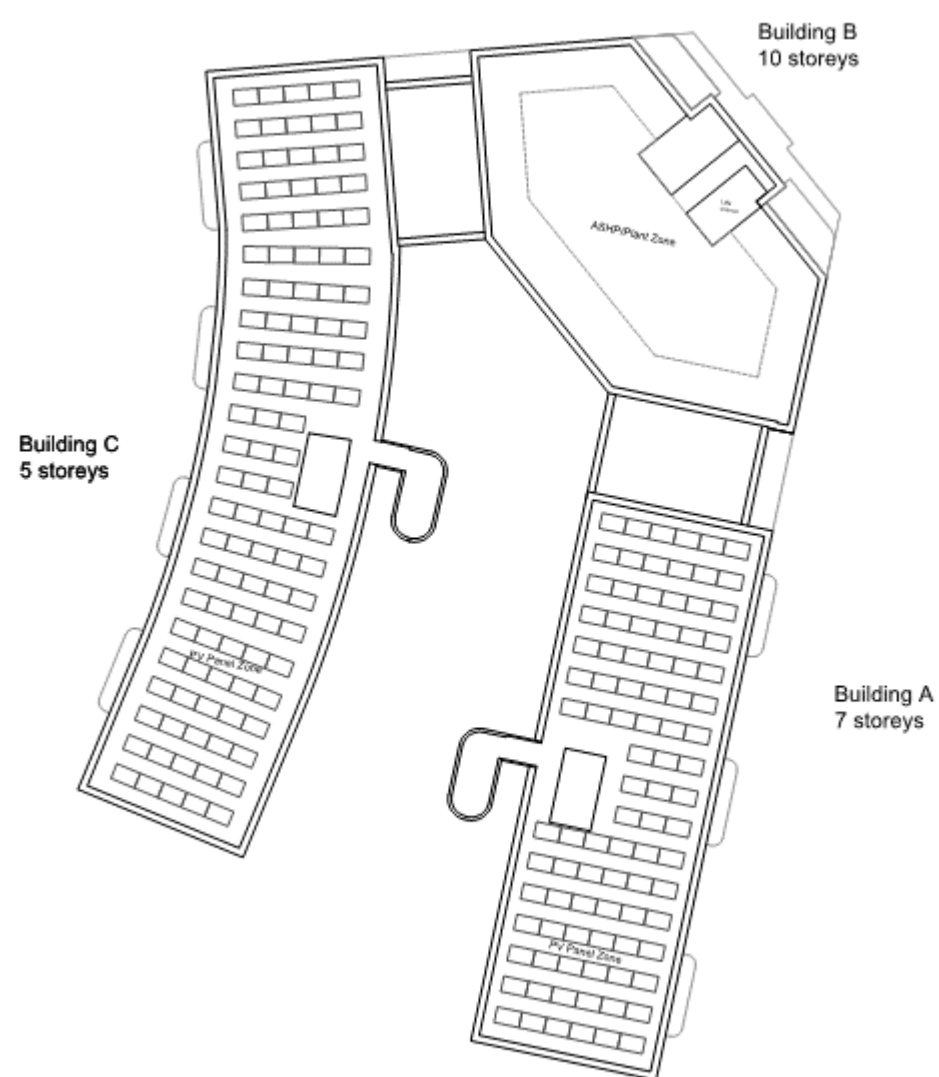
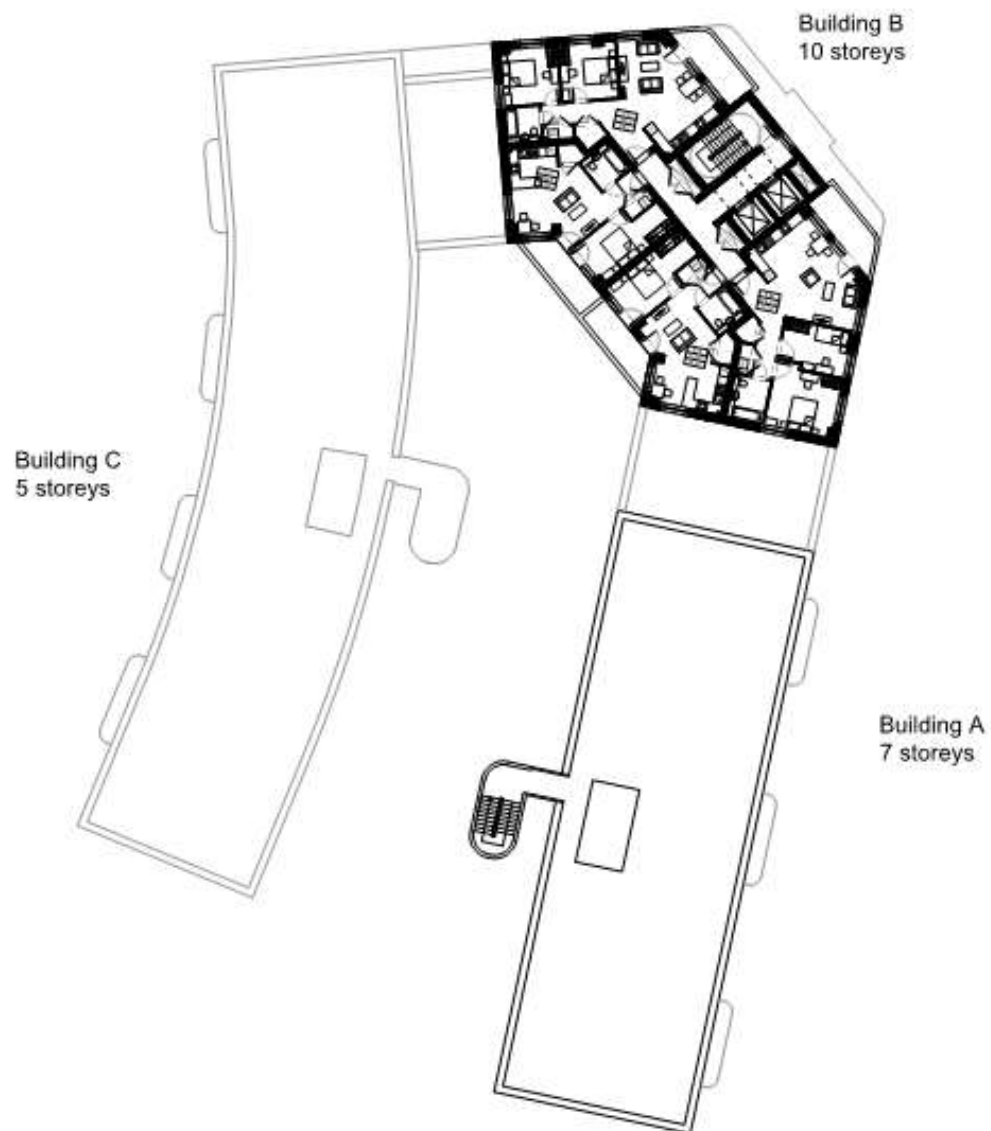
Entrance Lobby
Circulation
Cycle Store
Bike Store
Plant Room
Social Rent - 3 bed
Intermediate - Studio
Intermediate - 1 bed
Intermediate - 2 bed
Private - Studio
Private - 1 bed
Private - 2 bed





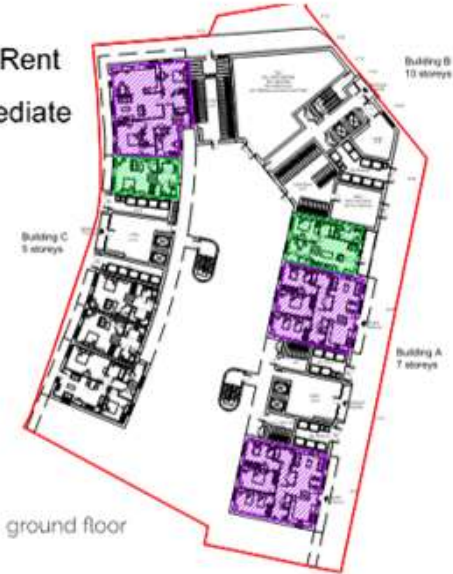




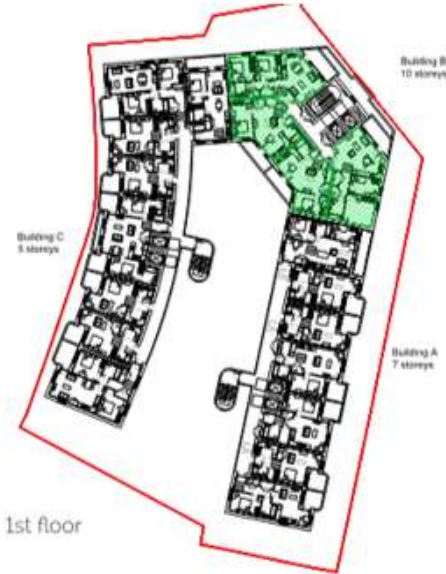


Key:

- Social Rent
- Intermediate



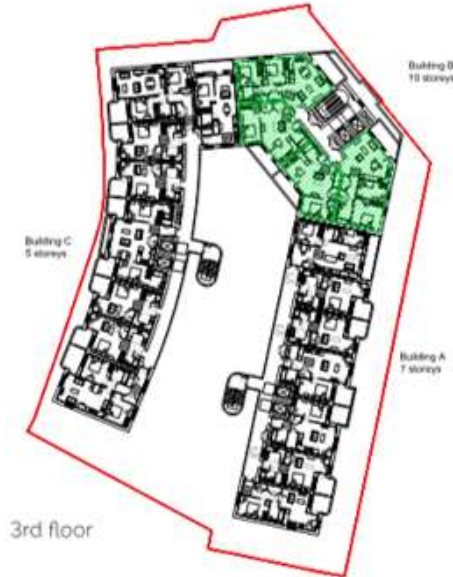
ground floor



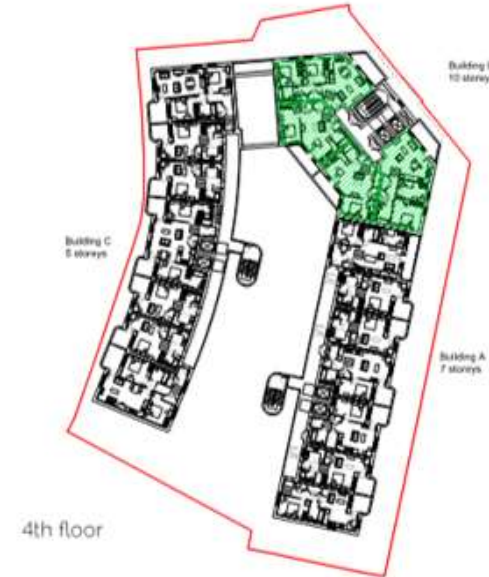
1st floor



2nd floor



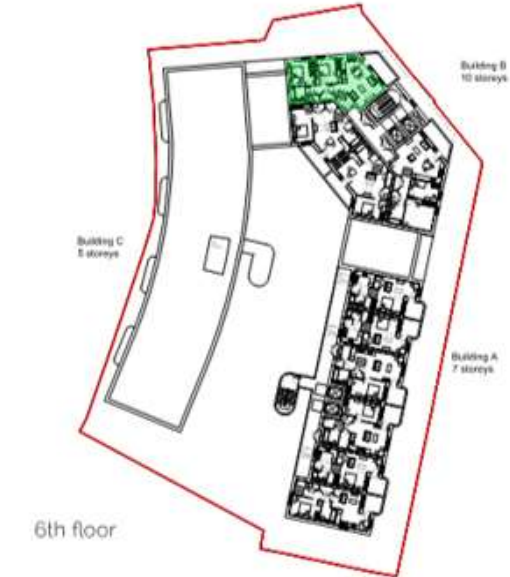
3rd floor



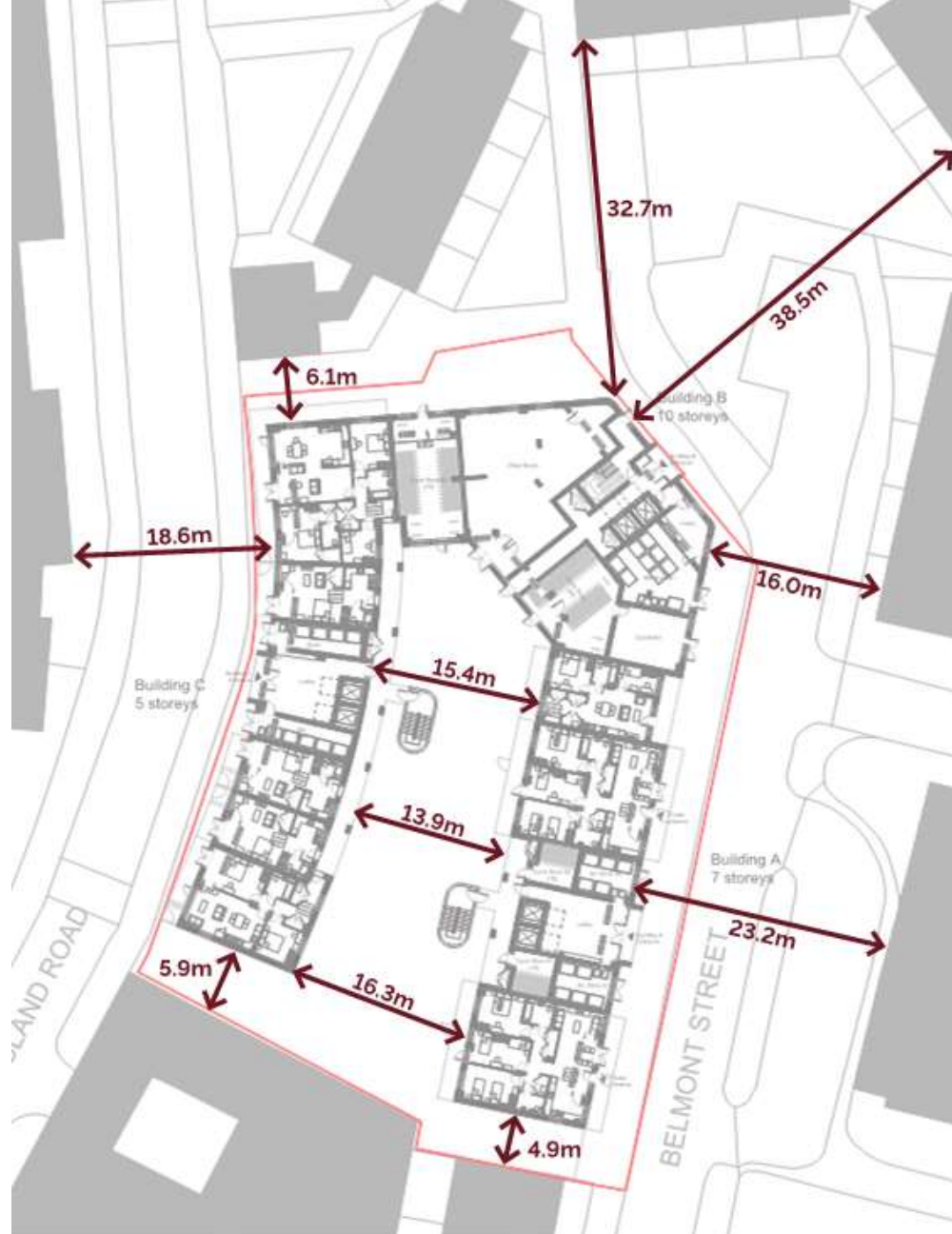
4th floor



5th floor



6th floor





Elevation 1





