Abbey Road Phase 3 Planning Statement

CBRE / Planning Statement
On behalf of the London Borough of Camden

Abbey Road Phase 3 Planning Statement

CBRE / Planning Statement
On behalf of the London Borough of Camden

May, 2022



Contents

1. Introduction	1
Application Deliverables	
Structure of this Statement	3
2. Site and Surroundings	4
The Site	
Surrounding Area	7
3. Planning History	9
The Site	9
Surrounding Sites	10
4. Proposals	11
Background	
Proposals	11
5. Pre-Application Advice and Consultation	16
Application advice and consultation	
6. Planning Policy Overview	26
7. Planning Assessment	29
Principle of Development	
Housing Provision	32
Design	36
8. Planning Obligations and CIL	55
Obligations	55
Community Infrastructure Levy	55
9. Planning Benefits	57
Additional Homes	57
Commercial Units	57
Public realm and landscaping	57
Biodiversity and greening	57

Energy and Sustainability	58
10. Summary and Conclusion	59
Appendices	60
Appendix A – Site Location Plan	61
Appendix B – Planning History: Minor Material Amendments	62
Appendix C – Relevant Planning Policies	65
Appendix D – Report on Commercial Space	87
Appendix E – Regeneration Statement	88

1. Introduction

- 1.1 This Planning Statement has been prepared by CBRE Ltd (hereafter 'CBRE) on behalf of the London Borough of Camden (hereafter 'the Applicant') in support of an application for Full Planning Permission for the redevelopment of Emminster and Hinstock blocks including Belsize Priory Health Centre, Abbey Community Centre, public house and commercial units otherwise known as Abbey Road Phase 3 (hereafter the 'Site'). A Site Location Plan is provided as Appendix A.
- 1.2 The purpose of this Statement is to set out the development proposal, how it relates to the statutory development plan and other material considerations. It describes the characteristics of the Site and surrounding area, the consultation with stakeholders and assesses the proposals in terms of the relevant planning policy.
- 1.3 Importantly, this Statement also describes the current proposal and its benefits when compared to the Hybrid Consent.
- 1.4 This application seeks Full Planning Permission for the following works:
 - Demolition and redevelopment of Emminster and Hinstock blocks including Belsize Priory Health Centre, Abbey Community Centre, public house and commercial units to provide new residential accommodation (Use Class C3) and ground floor commercial space (Use Class E/Sui Generis) to be used as flexible commercial units, across three buildings ranging from 4 to 11 storeys, along with car and bicycle parking, landscaping and all necessary ancillary and enabling works.
- 1.5 A letter was submitted to London Borough of Camden (LBC) on 10 December 2021 confirming that the proposals are not Schedule 1 development under The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (hereafter the 'Regulations') and that the proposals are also below the thresholds which trigger the need for Screening, as set out in paragraph 10b of Schedule 2 of the Regulations and as such no Screening was required. This position was confirmed and agreed by the LBC planning officer by email on 10 December 2021.

Application Deliverables

- 1.6 This Planning Statement should be read in conjunction with the following set of documents. This list was agreed with the Case Officer at the pre-application stage, as per the Planning Performance Agreement.
- 1.7 The following documents are included:
 - Planning Application Form (CBRE)
 - Planning Statement (CBRE) including:
 - Regeneration Statement
 - Community Infrastructure Levy (CIL) Additional Information Form (CBRE)
 - Design and Access Statement (PTE Architects) including:
 - Crime Impact Assessment

- Waste Storage and Collection
- **Accessibility Statement**
- Landscape Design (Fabrik)
- Site Location Plan (PTE Architects)
- Existing Plans, Demolition Plans, Sections and Elevations (PTE Architects)
- Proposed Plans, Sections and Elevations (PTE Architects)
- Landscape Plan (Fabrik)
- Affordable Housing Statement (Gerald Eve)
- Affordable Housing Financial Viability Assessment (Gerald Eve)
- Transport Assessment (Stantec) including:
 - Framework Travel Plan Draft Delivery
 - Outline Delivery and Servicing Plan
 - Outline Construction and Logistics Plan
 - Outline Car Parking Management Plan
- Acoustic Assessments (RBA):
 - External Building Fabric Assessment
 - Acoustics, Ventilation and Overheating Level 1 Assessment
 - Level 2 Overheating Assessment
- Statement of Community Involvement (IPB Communications)
- Archaeological Desk-Based Assessment (RPS)
- Heritage, Townscape and Visual Impact Assessment (The Townscape Consultancy)
- **Energy Statement (AECOM)**
- Sustainability Assessment Statement (AECOM)
- Circular Economy Statement (AECOM)
- Whole Lifecyle Carbon Assessment (AECOM)
- Air Quality Assessment (Hilson Moran)
- Flood Risk Assessment and Surface Water Drainage Strategy (Stantec)
- Pedestrian Wind Environment Study (Windtech)
- Arboricultural Impact Assessment Report (Sharon Hosegood Associates) including:
 - Tree Survey

- Construction Environmental Management Plan (Wates)
- Phase 1 Ground Conditions Assessment (Stantec)
- Health Impact Assessment (CBRE Environmental)
- Equalities Impact Assessment (CBRE Environmental)
- Biodiversity Net Gain Assessment (Stantec)
- Ecological Assessment Report (Stantec)
- Employment and Training Strategy (Volterra)
- Fire Statement including Gateway 1 (OFR Consultants)
- Daylight and Sunlight Assessment (Delva Patman Redlar)
- Operational Waste Strategy (Stantec)
- Proposed External Lighting (Norman Bromley)
- Foul Drainage and Utilities Assessment (Norman Bromley)
- Overheating Assessment (AECOM)

Structure of this Statement

- 1.8 This Planning Statement is structured as follows:
- Section 2 describes the Site and surrounding area;
- Section 3 summarises the background to the proposal and the planning history;
- Section 4 sets out the proposed development;
- Section 5 summarises the consultation process and pre-application advice received;
- Section 6 details the planning policy context
- Section 7 provides a planning assessment
- Section 8 sets out the planning obligations
- Section 9 sets out the planning benefits of the proposals
- Section 10 provides a summary and conclusion

2. Site and Surroundings

The Site

2.1 The proposed development is a triangular site that consists of Belsize Priory Health and Abbey Community Centre, two affordable housing blocks and ground floor commercial units. The site measures 0.565 ha in area. The Site is located to the west of the junction of Abbey Road (B507) and Belsize Road (B509), within the Kilburn Ward of in the London Borough of Camden (LBC) (hereafter "the Site").

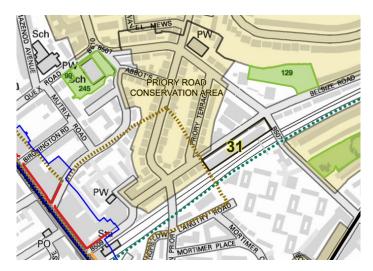


Source: Site Location Plan, Pollard Thomas Edwards, 2022

- 2.2 The Site forms Phase 3 of the three phase estate regeneration which was approved in May 2014 (Hybrid consent, application reference: 2013/4678/P). This current application is specific to Phase 3 and will be a standalone planning application, seeking Full Planning Permission.
- 2.3 In its current state, the Site comprises the Belsize Priory Health Centre, the Abbey Community Centre and two affordable housing blocks, Hinstock (five-storeys) and Emminster (eight-storey block). These residential buildings comprise 74 units, made up of 55 1-beds and 19 studios. The units were originally 70 social rent units and 4 market units, as documented in the Hybrid planning application. However, recently two of the market units were bought out by the Applicant and the remaining two market units will be bought out by the Applicant this year. A number of tenants from these residential units have been re-housed in the neighbouring Phase 1

development, or within other developments in the borough. In addition, there are nine retail units on the ground floor of the Site:

- One of these units is vacant and temporarily used for contractor storage
- Four are occupied by a party shop for a combination of storage and retail
- Two are occupied by a piano shop
- One is occupied by an off-licence/grocery shop
- One is used by the Tenant Management Organisation (TMO) (which is being relocated to a new unit in the Phase 1 development)
- 2.4 There is also a hot food takeaway and a public house. The communal areas of the Site are comprised of hardstanding and a limited number of trees. The majority of these trees are along Abbey Road.
- 2.5 The Site is not subject to any Local Plan designations (see extract of Policies Map below). The Site does not lie within a Conservation Area or contain any listed buildings but there are adjacent and nearby Conservation Areas and listed buildings, see paragraph 2.10 below for more details. There is also an Archaeological Priority Area located to the west of the Site.



4

Archaeological Priority Area

Source: London Borough of Camden Policies Map 2021 August V3

- 2.6 Vehicular access to the Site is from the eastern boundary along Abbey Road. There are two accesses for pedestrians, one from Belsize Road and the other from Abbey Road. Access to Hinstock and Emminster blocks is also on Belsize Road, on the southern border of the Site.
- 2.7 The Site is located within Flood Zone 1 (this is a low probability zone which is defined as having less than 0.1% probability of flooding each year).
- 2.8 The area is well-served by public transport and the Site benefits from a public transport accessibility level ('PTAL') of 6a (with the highest rating being 6b). Therefore, it is considered to have a very good level of access to public transport. The Site is located between Swiss Cottage Underground Station, South Hampstead and Kilburn High Road Station, which are serviced by the Jubilee line and Overground trains. There are two bus

stops in close proximity of the Site which are serviced by 10 routes across London, including routes 31¹, 139² and 189³. There are also additional bus stops on roads within proximity to the site, including Kilburn High Road to the west and Quex Road to the north, all of which are within a 6-minute walking distance. The nearest National Rail services are provided from West Hampstead Thameslink which is approximately 1.3km from the Site, a route serviced by the frequent 139 bus.

¹ Route runs from Bayham Street to White City Bus Station

 $^{^{2}}$ Route runs from Golders Green Station to Waterloo Station/Waterloo Road $\,$

 $^{^{\}rm 3}$ Route runs from Brent Cross Shopping Centre to Marble Arch Station

Surrounding Area

2.9 The character of the surrounding area is predominantly residential, however, it does feature a mix of architectural styles and heights. The building typologies in the surrounding area vary in age and there is a diverse range of materials. There are a number of secondary uses such as offices, community centres, retail, leisure and a variety of supporting ancillary uses.

2.10 Designations within the surrounding area include:

- The Site is bounded by the Priory Road Conversation Area (map ref 1)
- The South Hampstead Conservation Area (map ref 2)
- The Alexandra Road Conservation Area (map ref 3)
- The Alexandra Road Estate (Grade II Listed) (map ref i)
- St Mary's Church (Grade II Listed) (map ref ii)
- St Mary's Church Hall (Grade II Listed) (map ref iii)
- Ebenezer Baptist Chapel (locally listed) (map ref iv)
- Priory Works, no 252 Belsize Road (locally listed) (map ref v)
- Nos. 254-256 Belsize Road (locally listed) (map ref vi)
- Alexandra Road Park (Grade II Listed) (map ref A)
- Archaeological Priority Area to the west (see extract of Camden Policies Map above)



Source: The Townscape Consultancy Heritage Townscape and Visual Impact Assessment (April 2022)

2.11 To the north-east of the Site is Snowman House and Casterbridge, two twenty-storey residential blocks, along with the surrounding open space, they form the Phase 2 site of the Abbey Estate redevelopment. Upon completion, the open space to the east of these residential towers will provide a health and community centre (relocated from Phase 3), a relocated residential car park, cycle parking, the demolition of the link bridge

- between Phase 2 and 3, and associated access and landscaping works. Phase 2 should be completed by summer 2022.
- 2.12 Bordering the site of Phase 2 on the north-east is the South Hampstead Conservation Area. This area is characterised as a residential Victorian suburb, that is largely homogenous in scale and character, with large, semi-detached and terraced late-Victorian properties dominating.
- 2.13 To the southeast is Rowley Way (the Alexandra Road Estate) (Grade II Listed), which sits within the Alexandra Road Conservation Area. The Alexandra Road Conservation Area has a homogenous character as it was developed by one landowner, the council, during the 1970s, and is characterised by high-density housing. The Alexandra Road Estate is Grade II listed due to its architectural significance. Neave Brown of Camden Architects Departments designed the estate in 1968 using brutalist architecture by constructing the estate from site-cast, board-marked white, unpainted reinforced concrete.
- 2.14 To the south of the Site is the completed Phase 1 of the Abbey Road Estate Regeneration. This comprises a 13-storey residential tower on the junction of Abbey Road and Belsize Road and a six-storey residential block along Belsize Road, with retail and commercial uses on the ground floor. This development replaced a multi-storey car park building that had ancillary commercial uses on the ground floor.
- 2.15 To its north-west, the Site boundary line borders Priory Road Conservation Area and Priory Terrace. This area is characterised by the Italianate fashion of the mid-19th century, with semi-detached villas dominating the area, mostly with three-storeys and a basement. There are two listed buildings within this conservation area, both to the north of the Site; the Church of St Mary (Grade II Listed) and St Mary's Church Hall (Grade II Listed).
- 2.16 Within walking distance of the Site there are several open green spaces. This includes Abbey Road Phase 2 open space, Alexandra Road Park and Kilburn Grange Park.

3. Planning History

3.1 This section provides an overview of the Site's planning history. This information has been obtained from records available from the London Borough of Camden's online planning applications register.

The Site

3.2 Abbey Road Phase 3 is the final part of the larger regeneration programme for the Abbey Road area. An original outline consent was approved in 2012, which established a three-phase plan where all existing buildings on site including link bridges are demolished. Phase 1 of the redevelopment comprised residential dwellings and ancillary retail, Phase 2 comprised a health and community centre, and Phase 3 provided further residential accommodation with ancillary commercial space. The full details of this initial applications are as follows:

Application Reference: 2012/0096/P

Outline application for phased redevelopment of site to provide up to 296 residential (Class C3) units (including up to 133 affordable units), up to 1,300 sqm of commercial floor space (Class A1-A5), up to 1,055sqm of business floorspace (Class B1), up to 2,500sqm community and health floorspace (Class D1) and associated space for parking, plant, servicing, ancillary storage and energy centre, all in five buildings as follows: Block C (up to 2 and 3 storey community and health uses), Blocks A, B, D and E (predominantly up to 6 and 7 storeys residential and commercial uses) and Block A (up to 6 to 12 storeys of residential and commercial uses); provision of open space and landscaping; alterations to existing highway layout and creation of new vehicular and pedestrian access routes; all following demolition of Belsize car park building, Abbey Coop Community Centre and Hinstock and Emminster blocks (including Belsize Priory Health centre, residential and commercial units), site-wide walkways and pedestrian railway bridge. Application provides detail for approval of layout and access only and not scale, appearance or landscaping. Approved 12th July 2012.

3.3 Subsequently, a Hybrid application was permitted in 2014. This application provided further details regarding Phase 1 and additionally, an outline application for Phase 2 and Phase 3. This hybrid consent superseded the previous Outline consent that was granted in 2012, which was not implemented. Phase 1 has been completed in line with this Hybrid consent. Full details of the Hybrid consent are as follows:

Application Reference: 2013/4678/P

Hybrid application for phased redevelopment of site, comprising detailed application for Phase 1 and outline application for layout and access only for Phases 2 and 3 (scale, appearance and landscaping are reserved matters). Full details provided for Phase 1 comprising: up to 141 residential units (including up to 66 affordable units) in a 14 storey tower and 6 storey block, with 522.5 sq m of retail floorspace (Class A1) and 398.9 sq m of flexible commercial floorspace (Classes A1-A5 and B1) at ground floor and associated space for parking, plant, servicing, ancillary storage and energy centre at basement level. Phase 1 includes open space and landscaping, alterations to existing highway layout and creation of new access routes, following demolition of the Belsize Road car park building. Phase 2 to comprise up to 2,500 sq m of community and health uses (Class D1) and up to 126sqm of office space (Class B1) in a two-storey building following demolition of existing high-level walkways. Phase 3 to comprise up to 85 residential flats in 6/7 storey blocks and 15 mews houses (including up to 48 affordable units), up to 120sqm of office space (Class B1) and up to 645sqm of flexible commercial floorspace (Classes A1-A5) and associated ancillary space for parking, plant and servicing in basement. Phases 2 and 3 include open space, landscaping, alterations to existing highway layout and new access routes. Phase 3 to follow the demolition of the Abbey Community Centre and Hinstock and Emminster blocks including Belsize Priory Health and Medical centre, residential and commercial units and site-wide walkways. Approved 16th May 2014.

- A number of Minor Material Amendments (Section 73) Applications were submitted and approved in relation to this Hybrid Consent. Details of these applications can be found in Appendix B of this statement.
- 3.4 As stated, Phase 1 was successfully implemented under this consent. However, changes were required that were not within the scope of an amendment to the Hybrid application. As such, a full planning application was submitted for Phase 2.
- 3.5 In 2015 a detailed application relating to Phase 2 was submitted, however, it was subsequently withdrawn in 2019. This application proposed that the health and community centre would be housed in separate buildings, one in the east of the Site, and one in the west. The full details of this application are as follows:

Application Reference: 2015/7204/P

- Erection of two new buildings within Class D1 to accommodate a new Health Centre and Community facility on land adjoining the Snowman and Casterbridge blocks on the Abbey Road Estate. The total development comprises 3143sqm (GIA) and includes improvements to the open space, landscaping and existing car parking with alterations to existing highways layout and new access routes. This application forms part of the wider redevelopment of the Abbey Road Estate and comprises land originally identified in Outline Planning Permissions 2013/4678/P dated 16 May 2014. This application was withdrawn in 2019
- 3.6 The withdrawal of this application was prompted by extensive consultation with the NHS user groups in relation to the health centre and with the residents and local community in relation to the scheme as a whole. As a result, it was decided that the two uses should be co-located, this accorded with the Local Plan and to provide a more efficient development that met the needs of the diverse users. Following this, an application was submitted for Phase 2 in June 2020 and granted 27th November 2020. The full details of the 2020 application for Phase 2 are as follows:

Application Reference: 2020/2486/P

- Construction of a new health and community centre (Use Class D1), relocation of existing residential car park, along with landscaping, associated access, demolition of link bridge between Phases 2 and 3, and cycle parking. Approved 27th June 2020.
- 3.7 Phase 2 is currently underway and is expected to be completed in the summer of 2022. A Minor Material Amendments (Section 73) Application was submitted and approved in relation to this consent and a Non-Material Amendment (Section 96a) Application is currently awaiting validation. Details of these applications can be found in Appendix B of this statement.

Surrounding Sites

3.8 A review of recent major planning permissions in the vicinity of the Site has been undertaken by way of a search of Camden's online planning register and no relevant applications were identified.

4. Proposals

Background

4.1 This section provides a description of the proposed development. Further details are provided in the Design and Access Statement prepared by Pollard Thomas Edwards, and in the suite of documents submitted in support of this application.

Proposals

Description of Development

4.2 The detailed description of development is as follows:

Demolition and redevelopment of Emminster and Hinstock blocks including Belsize Priory Health Centre, Abbey Community Centre, public house and commercial units to provide new residential accommodation (Use Class C3) and ground floor commercial space (Use Class E/Sui Generis) to be used as flexible commercial units, across three buildings ranging from 4 to 11 storeys, along with car and bicycle parking, landscaping and all necessary ancillary and enabling works.

Hereafter the "Proposed Development".

Use and Quantum of Development

- 4.3 The scheme for the redevelopment of the site proposes the demolition of the existing residential buildings, public house, health centre, community centre and retail units on site and the redevelopment of the site. The health and community centre have been re-provided through Phase 2, which will be completed in summer 2022. The Phase 3 proposals comprise three residential buildings ranging in height from four to eleven storeys, with the height stepping up towards the junction of Abbey and Belsize Road, with ancillary flexible commercial floorspace at ground floor and a private communal garden to the rear which will include children's play space. The development is proposed to be car-free, with the exception of wheelchair accessible parking which will be accommodated adjacent to the site.
- 4.4 The total proposed floor area is 13,176.3 sqm (GIA). A floorspace schedule is provided below.

DESCRIPTION	USE CLASS	SQM (GIA)
Residential units	C3	12,871
Flexible commercial floorspace	Sui Generis/Class E	305.3

Proposed Residential Units

4.5 As discussed with London Borough of Camden (LBC) and the Greater London Authority (GLA) during the pre-application stages, the Proposed Development will provide a mixture of market and affordable housing as well as a mixture of unit sizes, appropriate for the needs of the borough. Accommodation schedules are provided below.

4.6 Summary by units:

	NUMBER OF UNITS			GRAND TOTAL
Unit type	Social Rent	Camden Living	Private Sale	
No. of units	36	10	93	139
%	25.9%	7.2%	66.9%	
%	33.1%		66.9%	

Summary by habitable rooms:

	NUMBER OF HABITABLE ROOMS			GRAND TOTAL
Unit type	Social Rent	Camden Living	Private Sale	
No. of habitable rooms	135	28	234	397
%	34%	7.1%	58.9%	
%	41.1%		58.9%	

Summary by residential GIA (sqm):

	SQM (GIA)			GRAND TOTAL
Unit type	Social Rent	Camden Living	Private Sale	
GIA	3906	754	8211	12,871
%	30.3%	5.9%	63.8%	
%	36.2%		63.8%	

Proposed Flexible Commercial Units

4.7 As discussed with the London Borough of Camden (LBC) and the Greater London Authority (GLA) during the pre-application stages, the Proposed Development will provide flexible commercial floorspace, to cater for the needs of local residents. There are two units proposed, both of which are capable of subdivision, comprising a total of 305.3 sqm (GIA) of flexible Sui Generis/Class E floorspace.

Car Parking

4.8 To align with the Local Plan (Policies T1 and T2) and The London Plan (Policies D7 and T2), the development will promote sustainable transport. This will occur through the prioritisation of walking, cycling and public transport, and subsequently, the development will be a car-free. In line with Policy T2 of the Local Plan, onsite parking will be limited to blue-badge spaces, with the provision of a policy-compliant 3% active provision of such badges. The Site has a PTAL rating of 6a (this is the second highest rating, with 6b being the highest rating). Therefore, the Site is considered to be in a good position to limit car-dependency and promote the use of sustainable modes of transport.

Cycle Parking

Residential Units

- 4.9 Cycle parking will be provided in accordance with the standards set out in the London Plan (2021) Table 10.2 as part of Policy T5 and London Cycling Design Standards (LCDS, September 2016). It is proposed that all blocks will provide cycle parking spaces, in convenient locations on the ground floor of the buildings.
- 4.10 The development will provide a total of 252 long stay cycle parking spaces across each site. Block B will accommodate the highest number of spaces (106) with Blocks A and B also accommodating substantial spaces (88 and 58 respectively). Additionally, there will be 8 short-stay cycle parking spaces across the site.
- 4.11 The cycle stores will be secured and covered, only accessible with the use of a fob; therefore, preventing people from accessing the stores that do not live within the respective block, in accordance with the LCDS.
- 4.12 Chapter 8 of the LCDS also states that at least 5% of the total number of cycle parking spaces should be capable of accommodating a larger cycle. Accordingly, 12 of the proposed cycle parking spaces shall be enlarged bike spaces.
- 4.13 The long-stay spaces located within the cycle stores will be a mix of Sheffield stands and retractable stacked bicycle racks. Therefore, over half of the spaces will be on ground level and not require lifting.

Commercial Units

- 4.14 The development will also accommodate 305.3 sqm of commercial floorspace shared between Blocks A and B. To allow for worst case scenario and to ensure sufficient cycle parking is provided, the cycle parking standards for the commercial units have been applied to the GEA for each unit, to determine the required quantum.
- 4.15 For the commercial space in Block A 1 long stay space will be provided and 6 short stay spaces. For the commercial space in Block B 2 long stay spaces will be provided and 12 short stay spaces. In total that's 3 long stay and 18 short stay.

Landscaping

- 4.16 The Site is part of a wider story of estate renewal, Phase 3 of 3. The estate is partitioned by the 4 arms of the Belsize and Abbey Road intersection, to the north is Phase 2 with existing residential towers, park and proposals for a health and community centre. To the south across Belsize Road is the completed and occupied Phase 1.
- 4.17 The three sites are distinct in their respective 'offers' in terms of open space, street activation and play, but what they share is the connective relationship through the road junction. The junction is the subject of a

- significant improvement by LB Camden that will improve the pedestrian experience through increased footway widths and new diagonal crossing arrangements across the junction.
- 4.18 The design work for Phase 3 is happening in parallel with Phase 2 so there are opportunities to establish visual and thematic links between the projects. The massing within Phase 3 is set back from Abbey Road, this piece of public realm is valuable in the wider master plan as a landing stage between the three phases and a visual totem representing the centre of the Abbey Road Housing Cooperative.
- 4.19 The site is a triangular shape, within the northern and western arms of Abbey Road and Belsize Road. The challenge is to create a landscape that at once holds the development together and responds to the sites prominent position at the junction, the levels and the boundary with the adjacent conservation area.
- 4.20 The concept seeks to define a traditional relationship between a building cluster set and a descending landscape setting.
- 4.21 The main defining features are the enclosing character of the buildings as they turn the corner, the charm of a character boundary wall which lends the backdrop to the space and exploitation of the levels.
- 4.22 We have distilled the theme to 4 core ideas;
 - Protection
 - Seclusion
 - Terracing
 - Congeniality
- 4.23 The garden will loosely follow the principles above in the identification of programme, planting and circulation.

Access

- 4.24 The site layout is arranged around the perimeter of a secure courtyard. Existing pedestrian routes are retained along Belsize Road and Abbey Road. New, good quality public spaces are created on both streets. These spaces are visible and open to the street, providing a safe environment to sit and pause.
- 4.25 The front entrance to each block is clearly marked by a change in materials and highlighted in green.

 Planters containing defensive plants define the ground floor residential plots, giving breathing space in front of them.
- 4.26 The setback entrances are designed to be generous and well-lit, to prevent anyone attempting to surprise residents as they approach the entrance. A secure lobby is created by two sets of internal doors at the front entrance, between these doors are in-the-wall post boxes.
- 4.27 Video access control will be provided to all front entrances. CCTV and data logging provided to all cycle stores and refuse stores, with access control programmed to limit access to those residents in the relevant block.
- 4.28 The lobby door at each floor will also have access control for compartmentation, preventing all visitors and residents from accessing any floors but the one on which they live. Likewise at ground floor, the residential corridors will be separated from the main access route.
- 4.29 Residents will have key fob access from the private garden back into the block they live, and also key fob access via the main gate to the private garden.

4.30 All refuse stores and cycle stores will have fob access and data logging to limit access to the relevant residents.

Design

- 4.31 The design concept for Phase 3 takes inspiration from the semi-detached nature of the surrounding Conservation Areas, which provide breathing space around the buildings allowing for a green visual connection between the private garden and public street.
- 4.32 A family of three blocks are proposed which are positioned and orientated to form new public spaces to the street and secure resident gardens behind. The breaks between the blocks allow for each of these proposed spaces to connect, both visually and physically (for residents).
- 4.33 The new public spaces to the street will provide breathing spaces along Belsize Road and Abbey Road where residents and locals can pause along these busy roads on their way to their destinations.
- 4.34 There are several other benefits to breaking the perimeter block which include an overall reduction in height, good quality dual aspect homes and improved daylighting to the gardens and homes (proposed and neighbouring).
- 4.35 The key design objectives and principles are:
- A sensitive response to location
- Safe, accessible and beautiful public realm
- Activate the street
- Architectural inspiration from the Conservation Areas
- Great homes for all
- Fabric-first response to climate emergency

5. Pre-Application Advice and Consultation

Application advice and consultation

- 5.1 In accordance with the National Planning Policy Framework (NPPF 2021), the Applicant has engaged with the Local Planning Authority (LPA) and other statutory consultees prior to the submission of this application.
- 5.2 The Applicant has consulted extensively with the LPA under a Planning Performance Agreement (PPA) to ensure that the scheme represents collaborative engagement in the best interests of the local community, the LPA and the Applicant. The Applicant has discussed the Proposed Development with the Greater London Authority (GLA) and the Camden Design Review Panel (DRP). The Applicant has also presented the proposals to Council Members at the Developers' Briefing (January 2022).
- 5.3 The Applicant has also sought to engage the local community, and local Councillors, through a series of public consultation events (in-person and virtual since November 2021). A Statement of Community Involvement (SCI) prepared by IPB Communications is submitted in support of this application, setting out the programme of community consultation and how responses informed the finalised proposals.
- 5.4 Key comments provided by the LPA, the GLA and the DRP are set out below. The Applicant team has taken these comments on board and have used them to inform the scheme. Pre-application discussions and the evolution of the scheme in response to comments are summarised below.

Consultation with the London Borough of Camden

5.5 As part of the evolution of the proposals, the Applicant has engaged with LB Camden on a number of occasions, including in accordance with the Planning Performance Agreement signed 18 January 2021. A summary of preapplication engagement for Phase 3, which commenced in November 2019, is provided below.

Pre-application meeting	Date
Initial meeting with LBC officers	20 November 2019
PPA Meeting	3 March 2020
PPA Meeting	11 June 2020
PPA Meeting	6 October 2020
Design Workshop	7 January 2021
PPA Meeting	17 March 2021
PPA Meeting	13 September 2021

Design Workshop	29 September 2021
PPA Meeting - Design	13 October 2021
PPA Meeting	10 November 2021
Design Workshop	8 December 2021
Design Workshop	19 January 2022
Secure by Design Workshop with Designing Out Crime Officer	17 February 2022
Design Workshop	3 February 2022
Transport and Waste PPA Meeting	17 March 2022
Secure by Design Workshop with Designing Out Crime Officer	7 April 2022

- 5.6 The engagement has focused on a range of matters relating to the Proposed Development, both in terms of the design and the technical evolution. The feedback received has been carefully considered and the scheme has sought to evolve and respond.
- 5.7 The table below provides a summary of the pre-application engagement on design and technical matters and represents the final position reached with LB Camden. The table is a summary of the most pertinent matters raised during the pre-application process, and is not intended to be exhaustive.

Theme	LB Camden Comment	Scheme Response
Estate Regeneration and Land Uses	Although the existing buildings on site will be demolished; Emminster and Hinstock, the Belsize Priory Health Centre, the Abbey Community Centre, the public house and retail units this is an accepted principle established by the previously consented Hybrid permission. The occupants of the existing Phase 3 have been rehoused in Phase 1 or elsewhere in the borough, the health and community centre are being reprovided in Phase 2, and the Proposed Development will reprovide flexible commercial floorspace that could be used as	The Phase 3 proposals have been carefully developed using a design-led approach that seeks to optimise the potential of the site and provide much needed housing, activated ground floor, landscaping, amenity and improved public realm and street experience. Whilst the applications have moved away from a single overall permission for the three phases the delivery, linkages and holistic development approach have been carefully incorporated into the development of the design, in consultation with LB Camden officers, the GLA and the DRP. Affordable housing and viability consultants have been closely involved in the scheme development and the required Affordable Housing Statement and Financial Viability

either Class E or Sui Generis. The principle of estate regeneration is supported in the local and regional policy however any future planning application will need to address policy requirements, in particular affordable housing and viability. In land use terms, the estate regeneration including the loss of the existing uses is acceptable in principle.

Assessment have been submitted as part of this planning application.

Affordable housing

The provision of 2 and 3 bed affordable homes is supported. The application will need to be supported by an Affordable Housing Statement and a Financial Viability Assessment to demonstrate that affordable housing on site is being maximised. It is understood that this will also need to consider the affordable homes provided as part of Abbey Road Phase 1.

The Phase 3 proposals are designed to meet the housing need within the borough and as such provide a mix of 1, 2 and 3 bed units (market and affordable housing). The proposals will provide 41.1% affordable housing based on habitable rooms, 36.2% based on residential floorspace (GIA) and 33.1% based on unit numbers. While this falls short of the policy target, this is the maximum achievable, viable, affordable housing contribution for this site. This is demonstrated through the Viability Testing required by the London Plan. The scheme provides a number of key public benefits of the scheme including improved public realm, the contribution of the scheme to the wider Estate Regeneration, the quality of the architecture and standard of the units that will be provided, compared to the existing provision, which comprises 74 units on site currently and that are all studio or 1-bedroom units. Please see the Affordable Housing Statement and Financial Viability Assessment submitted for full details.

Ground floor retail/commercial use

It is understood that the existing commercial floorspace on site is underutilised and the re-examination of this and provision of a lesser quantum of flexible commercial floorspace is supported in principle. The application will need to demonstrate how the new units will operate, including potential subdivision, and will need to justify the demand for such space.

The existing ground floor retail units will be demolished and flexible floorspace will be provided on the ground floor, as part of the proposals. At present there is 835sqm of floorspace across the existing nine retail units and a hot food takeaway, however one is vacant and a number of others are underutilised. The Proposed Development is seeking to provide flexible Class E/Sui Generis floorspace, totalling 305.3sqm (GIA). This floorspace will be spread across two units, one of which is capable of subdivision. The units will be located at the junction of Abbey Road and Belsize Road, to enliven the street scene and create a public area, complementing the activated ground floor of Phase 1. This approach is considered the

best balance between making the best use of the site in terms of splits of uses and ensuring any commercial space is successful in this location. Please see the DAS and the report on commercial floorspace prepared by Camden for further information.

Design and Conservation

The proposed heights and degree of articulation are supported and have a positive relationship with the other buildings in the surrounding area. The angling of the blocks, glimpses through to the courtyard garden and the activation of the ground floor and improved public realm are supported.

The proposed material and finishes will need to be of high quality and have a positive relationship with the surrounding buildings. Any future proposal will need to include a Heritage, Townscape and Visual Impact Assessment, assessing the proposals in detail.

The proposals have been developed using a design-led approach, in line with the local and regional planning policies. The design and materials of the proposals have been carefully developed in conjunction with townscape and heritage specialists and in consultation with the Camden Design Review Panel, the GLA and the LB Camden officers. For full details please refer to the Design and Access Statement prepared by PTE.

The proposals have been assessed in townscape terms and are not considered to adversely impact upon any of the key views or listed buildings and in many cases have a positive impact on such views and/or settings. Please refer to the Heritage, Townscape and Visual Impact Assessment (HTVIA) prepared by the Townscape Consultancy for full details.

Amenity

The communal and private amenity space provided by the communal garden and balconies is supported in principle. Maximising dual aspect units is supported and the work carried out to ensure enhanced single aspect units in block A is supported in principle. A detailed assessment of amenity space and playspace will need to be included in any future planning application. The applicant team will also need to assess internal and neighbouring daylight sunlight levels, carry out a microclimate assessment, overheating assessment and acoustic assessments.

The proposals have been carefully designed in close consultation with the consultant team including daylight sunlight, acoustic, overheating and microclimate specialists. The proposals have incorporated mitigation measures where necessary to optimise the residential units and overall design. The communal garden to the rear measures 1850sqm and will accommodate at least 675sqm of play. This is in line with the requirement set out by the Child Yield Calculator. Please see the technical reports including the DAS, overheating assessment, acoustic assessments, daylight and sunlight report and wind report submitted with this application for full details.

Accessibility

The proposals will need to demonstrate compliance with Policies D3 and D5 of the London Plan in terms of inclusive access, provision of 10% wheelchair user A total of 15 wheelchair units (category M4(3)) are proposed across all tenures, which equates to 10.79% of all units.

Camden Living tenure and Social Rent tenure Wheelchair dwellings are proposed in Block A, dwellings M4(3) and the remainder of dwellings to be accessible and adaptable M4(2). The Council should secure M4(2) and M4(3) requirements by condition as part of any permission.

Private Sale Wheelchair dwellings are provided in Blocks B and C. Category M4(3) Social Rent & Camden Living (Affordable Rent) units are to be designed, built and fitted-out as Wheelchair Accessible Dwellings to comply with Building Regulation M4(3)(2)(b).

Category M4(3) Private Sale units are to be designed and built as Wheelchair Adaptable Dwellings to comply with Building Regulation M4(3)(2)(a).

All remaining units are to be Category M4(2).

Landscaping, Trees and Biodiversity

The applicant should prepare and submit a landscaping strategy and should aim to meet the 0.4 Urban Greening Factor target. The landscape strategy should also include the provision of playspace, using the GLA child yield calculator.

A landscaping strategy has been prepared by Fabrik and is included in Chapter 5 of the DAS. A Biodiversity Net Gain Assessment has also been carried out. The proposals currently result in a significant Biodiversity Net Gain of 100.6% and an Urban Greening Factor of 0.42, which exceeds the policy target of 0.4. This is in compliance with planning policy and the feedback received from LB Camden. The landscape strategy includes a playspace strategy. The communal garden to the rear measures 1850sqm and will accommodate at least 675sqm of play. This is in line with the requirement set out by the Child Yield Calculator.

Highways

The scheme is car free, with the exception of a policy compliant level of disabled parking bays. This is supported.

A policy compliant level of cycle parking, including provision for larger cycles, is supported. The cycle parking access and storage should be safe and secure.

Wider improvements to the pedestrian experience is welcomed.

A Transport Assessment has been submitted as part of this application with full information on the Healthy Streets Assessment, Active Travel Zone and car and cycle parking provision.

The layout and function of the ground floor, private communal garden and the public areas have been developed and optimised by the applicant team, to respond to the comments of LBC officers, the GLA and the DRP.

London Plan 2021 Policy T6.1G requires that disabled parking spaces are provided at an initial rate of 3% of the total number of dwellings. A total of 5 disabled spaces are provided (two on Abbey Road and three on Belsize Road) with a further disabled space available for visitors to the commercial spaces. Additional disabled parking spaces (up to 7% as set out in London Plan 2021 Policy T6.1G) could be provided in the future, subject to demand, by converting the existing parking spaces on Belsize Road.

For residents across the three blocks, a minimum of 252 cycle spaces are required, of which 12 are for larger cycles/ cargo bikes. There is a separate cycle store provided for each block, accessed from the secure courtyard, and with key fob access for the relevant residents. Each store provides a minimum of 50% floor standing Sheffield stands, with retractable cycle stands above, with setting out to meet chapter 8 of the LCDS.

Additional spaces for block B are provided in a dedicated store in the Southwest corner of the site. Again, this store provides a minimum of 50% floor standing Sheffield stands, with retractable cycle stands above. There are two separate stores for larger cycles/ cargo bikes, one within Block A and another within the courtyard, within these stores the spaces are all floor standing.

In addition, a total of 8 residential visitor spaces are provided outside the residential entrances. A further 18 visitor spaces are provided for visitors to the commercial units. London Stands will be installed in all public areas, in accordance with Secure by Design requirements.

There will be 3 long stay cycle parking spaces provided to serve the commercial units in Block A and Block B.

There will be two loading bays, one on Belsize Road and the other on Abbey Road to accommodate delivery and servicing trips. This is in addition to refuse stopping kerbside to service Block B.

Please see the Transport Assessment, Travel Plan, and DAS for full details.

Construction Management

To ensure construction works do not adversely impact the surrounding area, a construction management plan should be submitted as part of any future planning application.

A Draft Construction Management Plan has been prepared and submitted as part of the application using the Camden Construction Management Plan template. It is expected that an updated Construction Management Plan will be secured by an appropriately worded planning condition.

Waste Management

The refuse and recycling storage need to be provided in line with London Plan Policy SI7, Camden Local Plan Policy CC5 and the Camden Planning Guidance on Design (January 2021). Technical The location of the refuse stores is shown in Section 6.3 of the Design and Access Statement. The strategy is discussed within the Operational Waste Management Plan prepared by Stantec.

specification for architects and developers must be clearly shown on the submitted drawings and an Operational Waste Management Plan must also be submitted.

Sustainable Design and Construction

On-site measures should achieve a minimum of 35% reduction in carbon emissions over the target emissions rate as set by Part L of the Building Regulations.

A fabric first approach has been adopted to reduce energy demand and the Dwelling Fabric Energy Efficiency (DFEE) is less than the Target Fabric Energy Efficiency (TFEE) Part L 2013 target.

The building services will include energy efficient lights, optimised heat distribution and mechanical ventilation with heat recovery.

The domestic units are currently showing a Be Lean CO2 emission saving of **11.90**%.

The non-domestic units are currently showing a Be Lean CO2 emissions saving of **25.38**%.

Total on-site carbon reduction is currently targeting a **58.81%** saving, exceeding the policy minimum of 35% saving.

Crime Prevention

All applications will be assessed against Local Plan Policies D1 and C5 and Camden Planning Guidance on Design (January 2021).

The principles of community safety have been considered and implemented into the design of the scheme and a meeting was held with the Designing Out Crime Officer (DOCO) in February 2022. A further meeting was also held on 7 April 2022. The project has been reviewed and developed in accordance with the recommendations of the DOCO and incorporating the guidelines of Secure by Design Homes 2019. Please see the DAS for further details.

Technical Considerations

Flood Risk – any future application should provide details of how SuDS are fully incorporated into the design of the development.

Air Quality – a full Air Quality Assessment should be submitted with any future application. . The design team have worked closely with flood and air quality specialists, incorporating key considerations and mitigation measures into the design and scheme evolution. Please see the Flood Risk Assessment and Sustainable Urban Drainage Strategy and the Air Quality Assessment submitted as part of this application for full details.

LB Camden Design Review Panel

5.8 Given the nature of the Site, the proposals have undergone review by the LB Camden Design Review Panel.

- 5.9 The applicant team engaged with the Design Review Panel on two occasions and also engaged in a final Chair's Review. The Design Review Panel meetings took place in December 2020 and December 2021 and the Chair's Review took place in early March 2022.
- 5.10 These comments provided by the Panel have been considered and incorporated as far as possible into the proposals. The Design and Access Statement prepared by Pollard Thomas Edwards provides a summary of the feedback received, and Applicant team response.

Greater London Authority

- 5.11 A pre-application meeting to discuss the full planning application for Phase 3 took place in January 2022. A summary of the pre-application response received is set out below.
 - The principle of the proposed estate regeneration is supported, however any future application must provide further details on unit affordability to ensure the like-for like replacement of the existing social rented housing.
 - The proposed scheme would provide a substantial net increase in homes which would make a contribution towards achieving the 10-year housing targets in the London Plan. As such, the proposed comprehensive redevelopment and housing intensification of the site is supported.
 - The overall net increase in affordable housing must be maximised and supported by a Financial Viability Assessment to ensure that the most suitable tenure mix is provided.
 - The rationale for demolition and rebuild on the Phase 3 site was established by the consented outline application and existing occupiers have been rehoused. In addition the Applicant team have investigated the viability of a refurbishment of the existing buildings on site and this was not viable. As such, the principles of the proposals are accepted by the GLA.
 - The applicant confirmed that there has been significant engagement with the existing residents since initial
 discussions of the estate renewal begin prior to 2012. Details of the community consultation process should
 be provided within any future planning application. In this case, the outline consent pre-dates the GLA
 requirement for a ballot to take place.
 - The GLA's First Homes Planning Practice Note sets out that London Plan policy requirements, London's housing need and deliverability and affordability issues clearly favour the provision of low-cost rent, London Living Rent and London Shared Ownership products over First Homes in London. The applicant does not propose First Homes within the development. This does not raise any strategic concerns and GLA officers will carry out a balancing exercise, taking into account these and any other material considerations at application stage.
 - The demolition of the community centre and health will not result in a loss of these floorspaces, as they are being re-provided in Abbey Road Phase 2 (which is nearing completion). This is in line with the requirements of Policy S1 of the London Plan.
 - The GLA's play space calculator (2019), should be used to assess the play space requirements. Any future
 application should be supported by a play strategy which demonstrates how the play space requirements for
 children would be met on site.
 - As the proposal includes at least one tall building it will need to be assessed against Policy D9 of the London Plan. The GLA officers are of the view that the proposed height appears to respond to the scale of the adjacent buildings as well as those in the surrounding context and as such the impact of the height of the scheme is not likely to raises no strategic concerns. However the planning application should assess the proposals against Part C of Policy D9.
 - The proposals must be assessed against Policies D12 and D5 of the London Plan, and satisfy the relevant fire safety criteria.

- The car free nature of the scheme is supported and accords with London Plan Policy T6 (Car Parking), with the exception of disabled parking spaces, which are in easily accessible locations.
- The proposals will need to demonstrate compliance with Policies D3 and D5 of the London Plan in terms of inclusive access, provision of 10% wheelchair user dwellings M4(3) and the remainder of dwellings to be accessible and adaptable M4(2). The Council should secure M4(2) and M4(3) requirements by condition as part of any permission.
- The initial layout and design concepts raise no strategic concerns. Comments regarding transport,
 sustainable development and the environment should be addressed within any future application, including:
 - The application must be supported by a full Healthy Streets transport assessment (TA), prepared in line with the TfL guidance.
 - Cycle parking provision must meet the minimum standards set out in Policy T5 (Cycling) of The Mayor's London Plan and designed in accordance with the London Cycling Design Standards (LCDS). A total minimum of 260 cycle parking spaces must be provided. Five percent (13 spaces) of cycle spaces should be able to accommodate larger bikes and be easily usable by mobility impaired cyclists. Access to the cycle parking should be step-free, and no homes must be too far away from cycle parking that it is reasonably unusable.
 - Delivery and servicing arrangements should seek to minimise conflicts with pedestrians and cyclists in accordance with policy T7 (Deliveries, servicing and construction) of the London Plan. An outline Construction Logistics Plan (CLP) should be submitted with the application detailing how construction of different phases of the Proposed Development will be managed.
 - All major development proposals should maximise opportunities for renewable energy generation by producing, using, and storing renewable energy on-site.
 - In accordance with London Plan Policy SI12 the applicant will be expected to calculate and reduce whole life-cycle carbon emissions to fully capture the development's carbon footprint. The applicant should submit a whole life-cycle carbon assessment to the GLA as part of any planning application submission, following the Whole Life-Cycle Carbon Assessment Guidance and using the GLA's reporting template.
 - London Plan Policy SI7 requires development applications that are referable to the Mayor of London to submit a Circular Economy Statement, whilst Policy D3 requires development proposals to integrate circular economy principles as part of the design process. Therefore, the applicant is required to submit a Circular Economy Statement in accordance with the GLA guidance.
 - The planning application must include the Urban Greening Factor and a landscaping plan, in accordance with Policy G5 of the London Plan.

Stakeholder Engagement

- 5.12 Consultation and engagement on the Abbey Regeneration Project has been ongoing since the development of the masterplan that was approved in 2013. For this final phase, a comprehensive Consultation and Communications Strategy for the project was agreed in September 2021. This built on the consultation to date and set out the following:
 - Background, communications to date, and renewed scope
 - Aims and objectives
 - Consultation approach and action plan
 - Resources, audiences, channels, and risks

- 5.13 This document identified a range of stakeholders to be engaged with during the development of the Phase 3 proposals including:
 - Local residents on Abbey Road Housing Cooperative Estate (Snowman House and Casterbridge, Emminster and Hinstock, 151-179 Belsize Road)
 - Local residents in the surrounding estate
 - The Abbey co-operative management committee
 - Housing managers and staff
 - Local Ward Councillors.

5.14 Please refer to the Statement of Community Involvement for full details.

6. Planning Policy Overview

- 6.1 This section provides the key national, regional and local planning policies relevant to this application.
- 6.2 The Town and Country Planning Act 990 (the "1990 Act") and the Planning Compulsory Purchase Act 2004 (the "2004 Act") establish the legislative basis for town planning in both England and Wales. These acts work together to establish a "plan led" system which requires the planning authorities to determine planning applications in accordance with the statutory development plan (the development plan) unless material considerations indicate otherwise.
- 6.3 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires that proposals are determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 6.4 The National Planning Policy (NPPF) (February 2019) is a material consideration in the determination of planning applications. The NPPF (2019) states that local planning authorities should apply the presumption in favour of sustainable development when assessing and determining development proposals.

Development Plan

- 6.5 The Site is located within the London Borough of Camden, and therefore, the statutory development plan comprises the following:
 - The London Plan 2021; and
 - London Borough of Camden Local Plan (2017)
- 6.6 Where there is a conflict between policies in the development plan, Section 38(5) of the 2004 Act provides that the most recently adopted policy takes precedence. As the London Plan is the most recently adopted policy of the above-mentioned development plan, where there is a difference in policy this document takes precedence, although in all cases, where possible, the proposals should seek to achieve the highest defined standards.

Emerging Development Plan

- 6.7 Emerging planning policy can also act as a material consideration in the determination of planning applications. The following guidance is relevant to the Site and is currently in draft form:
 - Fire Safety LPG (Draft):
 - Characterisation and Growth Strategy LPG (Draft);
 - Housing Design Standards LPG (Draft);
 - Optimising Site Capacity: A Design Led Approach LPG (Draft);
 - Air quality Positive LPG (Draft);
 - Air Quality Neutral LPG (Draft); and
 - Sustainable Transport, Walking and Cycling (Draft).

Other Material Considerations

6.8 On a national level, material considerations include;

- National Planning Policy Framework (2019).
- 6.9 On a regional level, the following material considerations are relevant:
 - The London Plan (2021);
 - Circular Economy Statements LPG (March 2022)
 - Whole Life Carbon LPG (March 2022);
 - The Accessible London SPG;
 - Planning for Equality and Diversity in London SPG;
 - Character and Context SPG;
 - Public London Charter LPG;
 - Housing SPG;
 - Play and Informal Recreation SPG;
 - Social Infrastructure SPG;
 - London View Management Framework SPG;
 - All London Green Grid SPG:
 - London's Foundations SPG;
 - Urban Greening Factor LPG;
 - Be Seen Energy Monitoring LPG;
 - Energy Planning Guidance; and
 - The Control of Dust and Emissions in construction SPG;
- 6.10 On a borough level, the following material considerations are relevant:
 - Access for All Camden Planning Guidance (March 2019);
 - Air Quality Camden Planning Guidance (January 2021);
 - Amenity Camden Planning Guidance (January 2021);
 - Biodiversity Camden Planning Guidance (March 2018);
 - Community, Uses, Leisure and Pubs Camden Planning Guidance (January 2021);
 - Design Camden Planning Guidance (January 2021);
 - Developer Contribution Camden Planning Guidance (March 2019);
 - Digital Infrastructure Camden Planning Guidance (March 2018);
 - Employment Sites and Business Premises Camden Planning Guidance (January 2021);
 - Energy Efficiency and Adaption Camden Planning Guidance (January 2021);

- Housing Camden Planning Guidance (January 2021);
- Planning for Health and Wellbeing Camden Planning Guidance (January 2021);
- Public Open Space Camden Planning Guidance (January 2021);
- Town Centre and Retail Camden Planning Guidance (January 2021);
- Transport Camden Planning Guidance (January 2021);
- Trees Camden Planning Guidance (March 2019);
- Water and Flooding Camden Planning Guidance (March 2019); and
- We Make Camden (2022)
- 6.11 A comprehensive review of relevant planning policies has been undertaken to inform the proposals. This is laid out in Appendix C, which demonstrates the relevant policies at national, strategic, and local levels.
- 6.12 Following such an in-depth review of the key policies as set out above, key matters to be considered in the planning assessment have been identified. These issues are addressed within the next section.

7. Planning Assessment

7.1 This section considers the Proposed Development to provide new homes, flexible commercial floorspace together with landscaping against the relevant planning policy requirements.

Principle of Development

Loss of existing

- 7.2 As set out in the Planning History chapter the Site forms part of the wider Abbey Road Estate Regeneration Scheme. Outline consent was originally granted in 2012 (2012/0096/P) for the comprehensive redevelopment of the three sites within the Estate to deliver up to 296 residential units, a health and community centre as well as a range of ancillary uses including plant, landscaping and parking.
- 7.3 Following this a then later Hybrid permission (2013/4678/P) secured full planning consent for Phase 1 of the regeneration securing consent for 141 residential units, commercial floorspace, a retail unit and ancillary space including a basement car park. This detailed element of the consent was implemented in December 2014 following the grant of permission in May 2014. This hybrid permission also secured outline consent was granted for the second and third phases. Phase 2 would deliver a health and community centre with Phase 3 delivering further residential units along with car parking and commercial floorspace. Matters such as dwelling mix, affordable housing provision and the decanting strategy around the existing phase 3 building and residents into the first to be delivered phase 1 part of the hybrid consent were considered holistically. The Outline elements of this planning consent relating to phase 2 and 3 have not been implemented. A Reserved Matters application was submitted for Phase 3 but was subsequently withdrawn. Please refer to Appendix B for full details of the previous planning applications.
- 7.4 A fresh full planning permission for Phase 2 was granted in November 2020, this provides a high-quality health and community centre set within enhanced landscaping for the wider community. The applicant is now seeking to bring forward the third phase of development to complete the regeneration at this important junction site. Whilst the applications have moved away from a single overall permission for the three phases the reality is the actual delivery, linkages and holistic development approach has not.
- 7.5 The principle of the loss and re-provision (where relevant) of these uses was first established in the 2012 Outline permission and has been a linking thread throughout the subsequent applications. The residential use will be re-provided and improved upon through the new application and this is considered in more detail below.

Health and Community Centre

- 7.6 Policy S2 of the London Plan requires development proposals for new and enhanced health and social care facilities to meet an identified need.
- 7.7 The existing health and community centre will be demolished and the re-provision of both of these uses in a purpose-built building being accommodated on Phase 2. Planning permission for Phase 2 was granted on 27 November 2020, with the scheme being implemented in March 2021. The scheme is subject to GLA funding and as such will likely be completed and ready for occupation in Summer 2022. As such the re-provision of these uses in Phase 2 meets the relevant policies.

Retail

- 7.8 Policy E9 of the London Plan (Retail, markets and hot food takeaways) sets out that neighbourhood shopping facilities, retail and related facilities that provide essential convenience and specialist shopping should be protected.
- 7.9 The existing ground floor retail units will be demolished and flexible floorspace will be provided on the ground floor, as part of the proposals. At present there is 835sqm of floorspace across the nine existing retail units:
- One of these units is vacant and temporarily used for contractor storage
- Four are occupied by a party shop for a combination of storage and retail
- Two are occupied by a piano shop
- One is occupied by an off-licence/grocery shop
- One is used by the Tenant Management Organisation (TMO) (which is being relocated to a new unit in the Phase 1 development)
- 7.10 There is also a hot food takeaway and a public house.
- 7.11 The Proposed Development is seeking to provide flexible commercial floorspace (Sui Generis/Class E) comprising 305.3 sqm (GIA) across two units centred around the junction. Both of these units will be capable of subdivision. This approach is considered the best balance between making the best use of the Site in terms of the split of uses and ensuring any commercial space is successful in this location.
- 7.12 The nearest alternative retail units to the subject parades are approximately 160m further south on Belsize Road where the council own a number of shop units on one side of a small parade. Traders here include a wine bar, a café, a hairdresser. Of the two empty units there is interest in both; one for a barbers and male grooming shop and one for the retail of pet products and services.
- 7.13 The Site is also located in close proximity to Kilburn High Road and South Hampstead which provide a range of retail, food and beverage facilities. In addition, a supermarket has been delivered directly opposite the site, as part of Abbey Road Phase 1.
- 7.14 The Camden Commercial Property Team have prepared a Report on Commercial Space, which can be found at Appendix D. As can be seen in the occupancy list above and as demonstrated in the Report the existing units are currently underutilised, with only two units occupied by traders predominantly serving the local residential population, and the limited amount of actual retail trade which takes place in the occupied units. As such, this supports the contention that demand for retail space in this location is limited. The Report goes on to state that retail patterns were already changing prior to the Covid pandemic, with more and more online retail, but this has accelerated following the lockdowns in the last two years. The majority of interest and demand in taking space in retail parades and locations is coming from service providers and food outlets. The Report concludes that the proposed level of new commercial floorspace (305.3 sqm GIA) and the arrangement and size of units is likely to be the optimum to attract new and viable businesses. In the experience of the Camden Commercial Property Team small units are very sought after especially by independent traders and start-ups. With the changes to retail over the past few years, less space is needed for display of goods as many are sold on-line. Much demand is from specialist café or coffee shop uses which only require a space for some food preparation, counter and some seating (and ideally some outside). Hair and beauty services operate with one or two 'chairs' and treatment rooms which can be accommodated in quite a small space keeping overheads manageable for the business. Smaller spaces also benefit from the Governments Small Business Rate Relief Scheme, which again assists the viability of the business. In terms of

- viability, sustainability, and contribution towards the overall success of the scheme, it is essential that the retail floor space is reduced from the current uneconomic level which is in excess of demand.
- 7.15 The flexible nature of the proposed commercial floorspace, the high quality design, its prominent location on a key junction of the regeneration scheme and the wider area and the market evidence of the need for smaller and more flexible units demonstrates that the reduced quantum, high quality, flexible commercial floorspace proposed is a sustainable and suitable proposal for the Site. As such, we believe that the proposals are in line with the relevant planning policies.

Public House

- 7.16 Policy HC7 of the London Plan (Protecting public houses) states that local authorities should protect public houses where they have a heritage, economic, social or cultural value to local communities or where they contribute to wider policy objectives for town centres, night-time economy areas, Cultural Quarters and Creative Enterprise Zones.
- 7.17 The public house on site is not a heritage asset or an Asset of Community Value. It is located in a residential area and not a town centre or night-time economy area, therefore it is not considered to be protected under this policy.
- 7.18 The flexible commercial units in the Proposed Development will be Use Class E/Sui Generis and so a public house or bar could be provided on site, if there was demand.
- 7.19 In summary, the loss of the existing uses (and re-provision where relevant) is considered to be an established principle of the estate regeneration and acceptable under planning policy.

Land Use

- 7.20 Policy H1 of the Local Plan (Core Strategy, 2017) states that LBC will aim to maximise the supply of housing and exceed a target of 16,800 additional homes from 2016/17-2030/31. In addition, Policy D1 and Table 4.1 of the London Plan (March 2021) sets a ten-year target of 10,380 new homes in Camden (2019/20-2028/29).
- 7.21 The need for housing in the borough is established in local and GLA planning policy and the proposals will assist in addressing this need. The principle of housing is therefore considered acceptable, under the relevant planning policy and by nature of the existing use of the site being residential.

Estate Regeneration

- 7.22 The London Plan (Policy H8) and the Mayor's Good Practice Guide to Estate Regeneration set out the considerations necessary when replacing existing housing. The loss of existing housing should be replaced by new housing at existing or higher densities, with at least the equivalent level of overall floorspace. The proposals have been designed in line with this, and the density and floorspace proposed exceeds that of the existing buildings.
- 7.23 A key aim of the proposals is to provide an increase on the quantum of affordable housing being proposed within the development. Whilst it is likely that there will be fewer overall units in these tenures, the housing delivered will be providing suitable replacement on a tenure basis but will also ensure a much higher quality of housing tailored to the current needs within the LB Camden for larger units. If the scheme had been designed on the basis of the existing mix of 1 bedroom and studio units, it would have simply achieved more units but completely failed to respond to the housing needs of the borough in the affordable housing tenure.
- 7.24 Whilst the Proposed Development will have consideration to Policy H8 (Loss of existing housing and estate redevelopment) the quantum of proposed residential development falls below that which would require a residential ballot in the Mayor's Good Practice Guide for Estate Regeneration.

7.25 Notwithstanding the above, the applicant is engaging and consulting with residents and stakeholders on an ongoing basis, those that do have a right to return have been factored into considerations and their needs will be met in the proposed new development.

Housing Provision

Housing Delivery

- 7.26 Under the London Plan 2021 Camden has a ten year target of delivery 10,380 homes. As set out in the Housing Deliver Test 2021 measurement (published 14 January 2022) Camden delivered 2,202 homes between 2018-19 and 2020-21, against a requirement of 2,891 homes.
- 7.27 This results in a Housing Delivery Test measurement of 76%. As this result is less than 85% of the housing requirement, in addition to preparing an action plan, a 20% buffer is added to the calculation of the five-year housing land supply. The presumption in favour of sustainable development is therefore automatically engaged (as per NPPF paragraph 125c) as insufficient homes have been built over the previous three-year period, and this is irrespective of whether the borough can demonstrate a five year supply of deliverable housing sites.
- 7.28 This demonstrates a clear and urgent requirement for additional housing supply within the borough. The Proposed Development represents the final phase of the Abbey Road Regeneration. It will provide a significant contribution of 139 homes to LBC's targets, with 41.1% affordable housing by floorspace on a standalone basis. The wider redevelopment (Phases 1 and 3) will deliver 280 dwellings in total. Of these 112 (46 units in Phase 3) will be affordable units and has been assessed on the basis of financial viability, in accordance with Policy H4 of Camden's Local Plan. This represents an uplift of 38 affordable units compared to the affordable housing provision at Abbey Road Estate. This equates to a 51% uplift on the existing affordable units and equates to an 78% uplift in affordable floor area (excluding common areas) that will all be delivered across Phases 1 and 3. Including apportioned communal space in the Proposed Phase 3, the uplift in affordable floorspace is 128%.
- 7.29 The Proposed Development will deliver a significant quantum of affordable housing, and sustainable delivery of housing more generally on a brownfield site, with an established principle of development, in order to help address the Council's persistent under delivery of housing and affordable housing.

Dwelling Mix

- 7.30 London Plan Policy H10 states that 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 factors including the local housing need and demand, the range of tenures in the scheme, the nature and location of the site, the need to deliver a range of unit types at different price points, the aim to optimise housing potential on sites, and the role of one and two bed units in freeing up family housing.
- 7.31 With regard to affordable housing, the approach is more prescriptive. Policy H10 states that for low-cost rent, boroughs should provide guidance on the size of units required (by number of bedrooms) to ensure affordable housing meets identified needs.
- 7.32 The LBC's dwelling size priorities are set out in table at point 3.189 of the Core Strategy. The table is based on the outputs of the Camden Strategic Housing Market Assessment:

Tenure	1 Bed (or studio)	2 Bedroom	3 Bedroom	4 Bedroom (or more)
Social-Affordable	Lower	High	High	Medium
Intermediate	High	Medium	Lower	Lower
Market	Medium	High	High	Lower

Source: LB Camden Local Plan (2017)

7.33 The Proposed Development will deliver 139 homes and the accommodation schedule is provided below. The unit mix specified places an emphasis on larger family sized accommodation for the Social-Affordable units, with a more flexible, site-specific approach for the Intermediate Rented units. The Private Sale units deliver a mix of 1B2P and 2B4P units, providing a homes for a range of individuals including families, in line with Camden's needs.

Unit size	Social Rent	Camden Living	Private Sale	Grand Total
1B2P	6	2	42	50
1B2P WCH	1	-	3	4
2B3P WCH	9	1	-	10
2B4P	3	7	48	58
3B5P	16	-	-	16
3B6P WCH	1	-	-	1
Total	36	10	93	139

Affordable Housing

- 7.34The Local Plan (Policy H4) sets a target of 50% of developments over 25 dwellings to be affordable. Affordable housing targets are applied to additional housing floorspace proposed. The key ambition of the scheme is to maximise the amount of affordable housing that can be delivered.
- 7.35 In addition, the London Plan (Policy H4) sets a target of 50% of all new homes to be affordable housing on public sector owned land, in order to meet the fast track criteria. However, the exception to this is estate redevelopment (Policy H8) which we understand this scheme will fall under. All development proposals that involve the demolition and replacement of affordable housing are required to follow the Viability Tested Route and should seek to provide an uplift in affordable housing in addition to the replacement of affordable housing floorspace.

- 7.36A standalone Affordable Housing Statement (AHS) has been prepared by Gerald Eve, in accordance with LBC's validation requirements. The key points from the AHS are set out below.
- 7.37 The outline permission for Phase 3 (the Hybrid consent) proposed 36 Social Rent unit (skewed towards 1 and 2 beds) and 12 Shared Ownership units. This has been improved on within the Proposed Development to deliver 36 Social Rent units (skewed towards 2 and 3 beds) and 10 Camden Living units. Whilst the overall number of units decreases by two units, the offer is improved with housing that addresses as an improved mix need and in the switch from Shared Ownership to Camden Living superior from an affordability perspective.
- 7.38 The London plan policy H8 requirement for viability testing of regeneration projects indicates that all estate renewal should aim to replace the loss of existing affordable housing by new housing at existing or higher densities with at least the equivalent level of overall floorspace. The current proposals target 33% affordable housing in Phase 3 and 40% across all phases (on a unit basis). On a floorspace basis, this equates to 37% in Phase 3 and 43% across all phases⁴. The Financial Viability Assessment (prepared by Gerald Eve) determines that while this fall short of the policy target, this is the maximum achievable, viable, affordable housing contribution for this site.
- 7.39A significant provision of 33% affordable housing is proposed in Phase 3 on a unit basis/ 41.1% on a habitable room basis/ 37% on a floorspace basis⁵. This is broadly in line with the aspirations of Policies H1, H2, H4, H7 and H8 of the London Plan, regarding the overall percentage and a tenure split of approximately 78% Social-Affordable Rented, and 12% Intermediate Rented within this, when assessed on a unit basis.
- 7.40 The affordable units are to be delivered as a mix of both Social Affordable and Intermediate Rented, in line with Camden's policy requirements. The Social-Affordable housing will be delivered as social rent in line with local and GLA policy guidance.
- 7.41 The Intermediate housing will be provided as Camden Living Rent. The proposed household income requirements for this product are within the Council and GLA requirements and will be accessible to households on incomes of up to £60,000 per annum.
- 7.42 The Applicant has undertaken extensive consultation with the Council and has also consulted with the GLA and Design Review Panel to design suitable affordable housing that will meet the needs of a wide range of households in housing need and can be effectively managed by a Registered Provider in the longer term.

7.43 It is also important to take into consideration the public benefits of the scheme which include:

- The contribution of the scheme to the wider Estate Regeneration
- The quality of the architecture and standard of the units that will be provided, compared to the existing provision, which comprises 74 units on site currently and that are all studio or 1-bedroom units
- Improved public realm, landscaping and significant net gain in trees and biodiversity

⁴ Please note, on a floorspace basis including apportioned communal areas this equates to 36% for Phase 3 and 41.6% across all phases.

⁵ As per footnote 4 above.

- Reprovision of flexible commercial floorspace that activates the junction of Abbey Road and Belsize Road and responds to the needs of local residents and retailers
- Embedded sustainability principles across the scheme
- 7.44 The Financial Viability Assessment undertaken by Gerald Eve provides an assessment of the FVA in accordance with the RICS Financial Viability in Planning mandatory guidance (2019) to verify whether the Scheme reflects the maximum reasonable level of affordable housing contribution, to assist in determination of the planning application against adopted planning policies and guidance.
- 7.45 In accordance with NPG (2019), in arriving at an opinion of a reasonable BLV, Gerald Eve have applied a valuation judgement; informed by the relevant available facts, a realistic understanding of the local area and of the operation of the market. Gerald Eve considers the BLV of £1 to be reasonable in the context of estate regeneration.
- 7.46 The FVA determines the financial viability of the Scheme, whilst also having regard to policy requirements for S106 contributions and the provision of affordable housing. We have also determined the financial viability of the proposed scheme against the viability of the original Hybrid application (2013/4678/P) which secured full planning consent for Phase 1 and outline consent for Phase 3. Based on their assessment of the Site, Gerald Eve conclude that the Proposed Development is financially compromised based upon the outlined level of Section 106 obligations. However, the proposed scheme is more viable than the original Hybrid consent.
- 7.47 With sufficient grant funding, the Applicant is willing to bring the Site forward to enable the area to receive wider benefits and complete the Abbey Road Estate Regeneration. The proposed scheme is more acceptable in planning terms than the original consent as it increases the overall quantum of units which can be delivered on the site (Policy H1). In addition to this, the proposed affordable units are better designed and larger in size and number of rooms, which LBC require.
- 7.48 If several additional 1 beds and studios had been integrated instead of these larger residential units then there would have been an increase in the overall number of affordable units provided, but they would not meet the LBC's requirement for larger units.
- 7.49 The Proposed Development is also preferable in terms of affordable unit type. The original application proposed shared ownership units which have now been replaced with Camden Living units. We are aware shared ownership is generally not accepted in Camden due to affordability issues. Camden Housing Guidance (Jan 2021) highlights the fact that units with private values above £600k would be in breach of the mayor's policy, as discussed in the Gerald Eve Affordable Housing Statement.
- 7.50 Over the entire regeneration, the applications replace the existing affordable units and provide an uplift of 38 units (51%) compared to the existing affordable accommodation. This equates to an 78% uplift in affordable floor area, exclusive communal space. Including apportioned communal space, the uplift in affordable floor is 128%. This adheres to the London Plan Policy H8. Accordingly, and consistent with the approach permitted by part D of Policy H8 of the London Plan, the replacement low cost rented affordable housing is being delivered as London Affordable Rent (LAR) rather than social rent in addition to immediate units in the form of Camden Living Rent. The replacement and additional affordable housing have been integrated into the development and will enable a mixed and inclusive community to be created.
- 7.51 Gerald Eve have undertaken sensitivity analysis to determine whether target levels of affordable housing can be viably delivered. They have concluded that analysis of variations in sales and costs indicates that the scheme would require a significant increase in revenue to be viable at target affordable levels or require a significant grant.

7.52 Therefore, the results of the Gerald Eve appraisal indicate that to be able to deliver the Proposed Development and wider regeneration benefits, the affordable housing provision is being maximised. The Proposed Development cannot viably support the provision of any additional affordable housing beyond what is proposed.

Commercial floorspace

- 7.53 Commercial units are provided in the ground floor of blocks A and B. As set out in paragraphs 7.14-15 above the requirement for reduced commercial space in the Proposed Development has been demonstrated. In line with the Circular Economy Statement, the new commercial spaces have been designed to be flexible in their arrangement to allow for a number of different future uses. The spaces can be subdivided into smaller units or retained to occupy the extents of the space in each block. This is illustrated in Section 4.2.7 of the DAS.
- 7.54The commercial units are assigned as Class E/ Sui Generis throughout the accompanying reports to allow for the differing uses that could be accommodated. This provides flexible units that can respond to the needs of local people and provide high quality and suitable spaces for the needs of prospective tenants and retailers.

Total GIA sqm	Unit Type	Area
Block A	Class E/Sui Generis	96.8 sqm
Block B	Class E/Sui Generis	208.5 sqm
	Total	305.3 sqm

Design

Site layout

- 7.55 In accordance with London Plan Policy D3, the proposed development has sought to make the best use of land, and to respond to the local context through layout, orientation, scale and the street hierarchy.
- 7.56 The Proposed Development consists of three residential blocks along Belsize Road and Abbey Road, with terraced residential gardens to the rear. Each block has been positioned and orientated to either address wider views, respond to the immediate context or to form new public spaces to the street.
- 7.57 All three blocks are positioned to sit a minimum of 18m away from existing neighbouring properties, with chamfered corners to the blocks helping to further increase privacy between habitable rooms.
- 7.58 The designs have been heavily inspired by both the historical richness of the surrounding Conservation Areas as well as seeking inspiration from the existing Hinstock and Emminster buildings on the Site.
- 7.59 The shift from the perimeter block to the three residential blocks references the semi-detached homes in the neighbouring streets and Conservation Areas, where the gaps between blocks allow for the rear gardens to extend out to the public realm. The orientation of the three blocks also reflect the setbacks to the existing buildings on site, helping to open up the public realm, maintain sight lines to Listed Buildings in the surrounding area and provide some breathing space along the busy Abbey Road and Belsize Road.

- 7.60 The six key design objectives set out in paragraph 4.35 above have helped to inform the building layouts in a sensitive and considered manner, carefully considered throughout the design evolution:
- A sensitive response to location: The height is concentrated at the junction of Abbey Road and Belsize Road
 (Block B, 11 storeys) and steps down towards the Conservation Area, responding to its height and context.
- Safe, accessible and beautiful public realm: New public space is provided at the junction of Abbey Road and Belsize Road, activating this key juncture of the regeneration scheme and providing a well-designed entrance and glimpses through to the rear courtyard.
- Activate the street: Ground floor homes, commercial units and communal entrances activate the street.
- Architectural inspiration: The architectural quality of the surrounding Conservation Areas is brought to the
 junction through the design and proposed materiality of the Proposed Development.
- Great homes for all: Good quality, tenure blind designed homes with private balconies proposed across the three blocks, in addition to the communal rear courtyard and gardens.
- Fabric-first response to the climate emergency: The Proposed Development has been designed in line with sustainability principles including managing energy usage, efficient supply of energy, prioritising renewable energy, and inputting plans to allow monitoring and reporting on energy usage.

Height, scale and massing

- 7.61 The Local Plan (Policy D1) states that all of Camden is considered sensitive to the development tall buildings. Tall buildings in Camden will be assessed against specific design criteria and particular attention will be given to; how the building relates to its surroundings, the historic context of the surroundings, views, overshadowing of public spaces and pedestrian permeability. In addition, tall buildings will be assessed in relation to amenity, mixed use and sustainability.
- 7.62 London Plan (Policy D9) requires that at the Borough Level, Development Plans should define what is considered 'tall' for specific localities. Paragraph 7.35 of the Camden Local Plan defines tall buildings as "those which are substantially taller than their neighbours or which significantly change the skyline" and Policy D1 (Design) and the Design Supplementary Planning Guidance (2021) note that due to the context and diversity of heritage and architecture the Council will not allocate areas for tall buildings. However, a detailed set of considerations are set out against which tall buildings will be assessed against. These considerations are in alignment with Part C of Policy D9 and provide a local assessment. It is against these which this proposal has been considered against in detail.
- 7.63 The current context surrounding the Site is mixed; the heights in the immediate proximity of the site (along Belsize Road) range from 6 to 13 storeys and Snowman House and Casterbridge (to the east) are 20 storeys, the remaining context, to the north and west, is comprised of lower rise residential buildings that range from circa 2 to 4 storeys. The proposed buildings are not considered to be 'substantially taller than their neighbours' and given the context the proposals would not substantially change the skyline.

 Notwithstanding this, the proposals will be assessed against Policy D9, and Policy D1 to ensure the most appropriate intervention in this location.
- 7.64 Policy D9 Part C states that development proposals should address the following impacts. Compliance with Part is demonstrated in Table 9 below.
- Visual Impacts
- Functional Impact
- Environmental Impact
- Cumulative Impacts

- 7.65 This application is supported by a Design and Access Statement setting out the appearance, architectural quality, design-led approach to the Proposed Development and how this has evolved through the preapplication consultation with LBC, the GLA, the Design Review Panel, members of the public and key stakeholders.
- 7.66 This application is also supported by a comprehensive Heritage, Townscape and Visual Impact Assessment (HTVIA) which confirms that the Site in its existing state does not positively animate the street, nor does it take advantage of the Site's location on a busy junction in inner London. That the Proposed Development is of a height appropriate for its location, and will enhance the Site's street frontages and the local townscape. Its form, scale and detailed architectural design are well considered and respond to the immediate and wider context. It will enhance the townscape character of the area, in particular by adding enclosure and legibility to Abbey Road and Belsize Road.
- 7.67 As illustrated in the views in section 8 of the HTVIA, the Proposed Development will be seen alongside Phases 1 and 2 of the Abbey Area Regeneration, contributing to the emerging identity around this junction. It will sit comfortably in its townscape context and will be seen as appropriately scaled mediating between the lower scaled townscape to the west and the larger scale to the east.
- 7.68 The HTVIA also demonstrates that in respect of design and historic environment consideration the Proposed Development is in line with the policies and guidance set out in national, regional and local planning policy and guidance.

7.69 We consider that material considerations justify the proposed height in this location:

- Optimising a brownfield site to provide market and affordable housing to help meet the delivery shortfall in LBC
- High quality design
- Positive impact on townscape and responding to the architectural language of the regeneration scheme and surrounding area
- Surrounding context/mixed heights as a result of Snowman House and Casterbridge and Abbey Road Phase
- The increase in heights towards the junction, with the tallest building located on the junction of Abbey Road and Belsize Road, responds to the surrounding area and provides a marker to the public realm at the base of the buildings and entrance to Phase 3
- The creation of active frontages and improved public realm on Abbey Road and Belsize Road through residential and commercial uses and landscaping, with visual connections to the rear courtyard
- 7.70 The below table sets out the Tall Buildings criteria and commentary on compliance in relation to the Proposed Development:

Assessment Criteria	Compliance
Visual Impacts	a) The submitted HTVIA considers the views of the Proposed Development from different distances and viewpoints. As illustrated in the views in section 8 of the HTVIA, the Proposed Development will be seen alongside Phases 1 and 2 of the Abbey Area Regeneration, contributing to the emerging identity around this junction. It will sit comfortably in its townscape context and will be seen as appropriately scaled mediating between the lower scaled townscape to the west and the larger scale to the east.

- The base of the buildings has been carefully considered, maintaining the pedestrian scale, animating the street and activating its character.
- b) Block B would provide a high-quality focal point at the junction of Abbey Road and Belsize Road, forming part of the hierarchy of buildings across Phases 1-3 of the Abbey regeneration scheme and stepping down away from the junction, towards the Conservation Area, bridging the architectural forms.
- c) The proposed materiality and appearance of the Proposed Development have evolved in line with design-led and sustainability principles, through pre-application engagement with LBC, the GLA, the Design Review Panel and the local community. Please refer to the DAS for further details.
- d) The HTVIA confirms that the Site is not located within a conservation area, nor does it include any designated heritage assets. In the wider area, there are several conservation areas, a number of listed and locally listed buildings and a registered park and garden. The significance of those with potential to be affected, and the contribution from setting to this significance, is set out in chapter 7. The Proposed Development will not harm the significance of any designated or non-designated heritage assets in the surrounding area.
- e) Not applicable the Site is not in the setting of a World Heritage Site.
- f) Not applicable the Site is not within the Thames Policy Area.
- g) With respect to solar glare, the Proposed Development materiality includes brick and no large glass facades. Adverse solar glare is therefore not relevant to this proposal.
- h) A Proposed External Luminaires Report has been submitted as part of the planning application. The drawings included in Appendix A of the Report indicate the light levels and light spillage to the site based on the luminaires detailed in the Report. The proposed external lighting design aims to provide a safe environment during the hours of darkness with minimal light pollution and spill light. It can be seen from lux diagrams that the proposed external lighting will have minimal impact on nearby dwellings or roads.

Functional Impact

- a) The internal and external design of the building, including construction detailing, the building's materials and emergency exit routes ensure the safety of occupants. Please refer to Fire Safety Strategy, Draft Construction Management Plan and Circular Economy Statement.
- b) The proposed servicing arrangement has been an early design consideration. Full details of deliveries and servicing are provided in the Delivery and Servicing Plan submitted in support of this application. The overall objectives of the DSP are to reduce the impacts of delivery and servicing activity at the site; enhance safety; reduce noise, air quality emissions and congestion; and manage potential conflicts with pedestrians and cyclists.
- c) Entrances, access routes, and ground floor uses have been designed allowing for peak time use and to ensure there is no unacceptable overcrowding or isolation in the

39

surrounding areas. The optimised layout of the site, and improved highways arrangement are described in the DAS and Transport Statement.

- d) The site is located in a highly sustainable location, with a Public Transport Accessibility Level (PTAL) of 6a. As noted in the Transport Assessment, a large proportion of the borough can be access within a 20 minute cycle ride (the Active Travel Zone), along with a number of key destinations, parks, schools, and town centres.
- e) The proposed development is considered to be a catalyst for further change in the area and completes the final phase of the Abbey Road regeneration. The proposed development significantly improves the appearance of the northwestern portion of the estate, and introduces public realm and small commercial units, activating the junction of Abbey Road and Belsize Road, benefitting the local economy and community.
- f) Part F requires that buildings, including their construction, should not interfere with aviation, navigation or telecommunication, and should avoid a significant detrimental effect on solar energy generation on adjoining buildings. No such detrimental effects on these factors have been identified during the design evolution and pre-application process.

Environmental Impact

a) Wind, daylight and sunlight and overheating have been carefully considered, and the suite of documents submitted in support of this planning application includes a Wind Assessment, Daylight and Sunlight Assessment (Internal and External), and Overheating Assessment.

The Wind Assessment confirms that:

- The results for the Proposed Development with the existing surrounds indicate that the wind conditions at ground level do not exceed the safety criterion within the site and surrounds.
- The wind conditions at all the areas of the site and surroundings are rated as safe for pedestrians and cyclist use throughout the year.
- At elevated levels, the wind conditions are also rated as safe for occupant use throughout the year.
- In the presence of the proposed development at the site, winds funnelling between the proposed Blocks are likely to occur within the site. Despite this flow phenomenon, all throughfares are suitable for intended pedestrian activities throughout the year. The proposed development provides shelter to the windiest areas occurred for the existing scenario where the wind conditions are calmer and are suitable for strolling during the worst season (winter).
- The wind microclimate outside the entrances of Block A exceeds the comfort criterion for entrance use by occupants/visitors during the worst season (winter). Mitigation measures are recommended for this entrance and have been incorporated into the design, as evidenced in the DAS. The wind microclimate outside remaining entrances (including those to Blocks B and C) is suitable for occupant/visitors use throughout the year.

- The summer seasonal results show that the wind conditions exceed comfort criterion at seating/play areas for intended pedestrian activities. Mitigation measures are recommended and have been incorporated into the design, as evidenced in the DAS. The wind microclimate at the remaining seating/play areas is suitable for the intended pedestrian activities.
- The wind conditions in the surrounds are suitable for their intended uses, ranging from standing to strolling during the worst season (winter). It should be noted that the wind conditions at the neighbouring garden to the west of the site are improved and are suitable for sitting during the summer season by the presence of the proposed development. The neighbouring roads are also suitable for cyclist use throughout the year.

The Daylight and Sunlight assessment confirms that:

- Daylight and sunlight provision to the new dwellings and sunlight to amenity spaces within the proposed development were assessed. The potential effects of the proposed development on daylight and sunlight to surrounding residential properties and amenity spaces were also assessed.
- The assessments were run using methodologies recommended in the BRE guide. The advice contained in the BRE guide is not mandatory, and its numerical guidelines should be interpreted flexibly. As the development contains housing, the NPPF and the Mayor of London's Housing SPG are relevant, which emphasise the need for flexible application of the BRE guidelines.
- Camden's local planning policy specifically acknowledges that the BRE guidance has been developed with lower density suburban situations in mind and that the numerical guidelines should therefore be operated more flexibly in dense inner-urban locations within the borough.
- The overall daylight adherence within the development is 74% for ADF and 71% for NSL, considering the alternative target guidance. For sunlight, the adherence percentage is 74% for the alternative target guidance. Many nonadherence results for both Daylight and Sunlight are the inclusion of inset or protruding balconies.
- The overall daylight adherence considering the impact on neighbouring properties is 91% for VSC and 88% for NSL. Both are high levels of adherence.
 In respect of sunlight, the overall adherence is 100%.
- In conclusion, the layout of the proposed development is consistent with the Council's local planning policy on daylight and sunlight, particularly having regard to paragraph 123(c) of the National Planning Policy Framework and paragraphs 1.3.45 and 1.3.46 of the Mayor of London's Housing SPG.

The Overheating Assessment confirms that:

— In keeping with CIBSE TM59 the design was developed to demonstrate that all units could potentially achieve a pass for a passive design approach via natural ventilation. However, the Approved Document Part O and the site acoustic constraints preventing windows opening on approximately 86% of the units. Implementing active temperature lopping for all units on the site was shown to be a reasonable solution to mitigate the overheating for the

- current and extreme weather tapes. This study should provide sufficient information to comply with the current GLA requirements.
- b) The non-domestic spaces are being supplied as shell and core units. Specification and design of heating, cooling and ventilation systems will be evaluated at the appropriate point in design evolution and will ensure that ventilation does not adversely affect street-level conditions.
- c) Demolition and Construction, Operational and Residential Noise and Vibration Assessments have been submitted as part of the application. Mitigation measures have been suggested as required, based on typical best practicable means and LBC Guidance.

Cumulative Impacts

The inter- and intra-cumulative visual, functional and environmental impacts of proposed, consented and planned tall buildings in an area, and where relevant mitigation measures, have been assessed in the suite of documents submitted.

- 7.71 London Plan Policy D9 Part D states that free to enter publicly-accessible areas should be incorporated into tall buildings where appropriate, particularly more prominent tall buildings where they should normally be located at the top of the building to afford wider views across London. As the Proposed Development is a housing scheme, this is not deemed appropriate.
- 7.72 In addition, the Proposed Development provides a mix of residential and flexible commercial uses. As set out in paragraphs on land use above, the need for housing in LBC is well documented and the provision of flexible commercial floorspace has been carefully considered and designed in an adaptable, sustainable way that responds to both the needs of local residents and the evolving needs of retailers.
- 7.73 The Proposed Development also provides considerable amenity space for residents through the inclusion of two private ground floor gardens, a communal courtyard garden including playspace as well as private balconies.
- 7.74 In addition, sustainability principles have been key to the design and technical specifications of the proposals. The design team have worked closely with sustainability and energy consultants and have incorporated key sustainability principles such as circular economy principles and renewable energy.
- 7.75 In conclusion, the proposed buildings are not considered to be 'substantially taller than their neighbours' and given the context the proposals would not substantially change the skyline. Notwithstanding this, the proposals have been assessed against Policy D9, and Policy D1 to ensure the most appropriate intervention in this location. The proposals have been carefully developed in accordance with and assessed against the Camden Policy D1 including how the building relates to its surroundings, the historic context of the surroundings, views, overshadowing of public spaces and pedestrian permeability and in relation to amenity, mixed use and sustainability and the requirements of London Plan Policy D9 and we are satisfied that this is an appropriate location for this well-designed scheme including a tall building.

Density

7.76 London Plan Policy D2 is clear that the optimum density of a development should be design-led, and defined with other factors such as context, layout, residential quality, existing and planned public transport, and capacity of surrounding infrastructure taken into consideration, in a move away from the density matrix of the previous London Plan.

7.77 The site has a PTAL rating of 6a and is a highly sustainable location with good access to goods and services. The scheme does not demonstrate symptoms of overdevelopment, with the site as a whole providing sufficient play space and all units meet the required space standards. No apartment building exceeds eight units per core, in accordance with the general guide set out in the Housing SPG.

Relationship with neighbouring buildings

- 7.78 In accordance with guidance set out in the Mayor's Housing SPG, the design uses a variety of measures to provide adequate privacy for every home.
- 7.79 The minimum distance between proposed blocks and neighbouring properties exceeds 18m throughout. In addition, the following design decisions have been made to ensure a balance is struck between privacy to neighbouring properties alongside comfort from within the proposed homes.
- Inset balconies with setback bedrooms introduced to street elevations provide enclosed amenity spaces for residents to enjoy, whilst also increasing the distance between proposed bedrooms and neighbouring properties
- Bay windows with split windows (double to street elevation and glazed door to side of bay onto balcony) to all street elevations reduce the amount of glazing overlooking neighbours. The glazed door from the bay to the balcony also provides an additional aspect for residents which looks away from neighbours
- Window sills to garden elevations are raised to reduce glazing overlooking Priory Terrace
- 7.80 Between the proposed blocks, there are instances where blocks are at a closer proximity, ranging from 6-10m between blocks. The following strategy has been applied to mitigate any overlooking between habitable rooms:
- Windows overlooking one another are minimised with the chamfered corners to blocks directing the vast majority of windows away from one another
- Where habitable rooms do overlook between blocks, windows have been positioned to offset one another so
 that no window directly looks into a neighbouring window
- Inset balconies exclusive to street elevations help with noise pollution from the busy street, help reduce overheating to homes and help reduce overlooking to the neighbouring Phase 1 block on Belsize Road and Casterbridge and Snowman House on Abbey Road
- Bay windows exclusive to street elevations help provide additional aspect away from neighbours, whilst referencing the street elevations of Priory Road and surrounding streets

Fire Safety

7.81 In line with London Plan Policy D12, a Fire Statement prepared by OFR has been submitted as part of the application submission. Relevant regulations and standards and the scheme's compliance are described within. The Statement includes the Gateway 1 form, as required from August 2021 onwards.

Heritage and Townscape

- 7.82 The Local Plan (Policy D1) states that LBC will require development to; respect local context and character, enhance local heritage assets, be sustainable in design and construction, be of high-quality design and materials, be inclusive and accessible for all, be well integrated, be secure, incorporate high quality landscape and amenity and to preserve strategic and local views.
- 7.83 The London Plan contains a number of policies relating to design (Policy D1, D1B, D2, D3 and D4) that echo the above LBC policy sentiments. The design considerations outlined in the policy include but are not limited to; local capacity for growth, existing and planned transport, local open space and green infrastructure, views, local heritage, accessibility. In addition, housing quality standards and national space standards will

- also apply to the residential accommodation proposed. These standards cover minimum space requirements, unit aspect, daylight and sunlight requirements and amenity space.
- 7.84 The design of the proposals has been carefully developed to ensure it respects and responds to local context and character, enhances local heritage assets and is well integrated. The proposals are well integrated into the context and surroundings, with the height focused at the Abbey Road and Belsize Road junction and stepping down towards the surrounding Conservation Area and lower rise buildings. As such, the design is considered to be compliant with the relevant local and GLA planning policies.
- 7.85 As set out above, this application is supported by a HTVIA which confirms that the Site in its existing state does not positively animate the street, nor does it take advantage of the Site's location on a busy junction in inner London.
- 7.86 The HTVIA assesses the Proposed Development in the context of the relevant planning policy and by evaluating the impact on key viewpoints, which were agreed with LBC officers during the pre-application process.
- 7.87 The HTVIA concludes that the Proposed Development is of a height appropriate for its location, and will enhance the Site's street frontages and the local townscape. Its form, scale and detailed architectural design are well considered and respond to the immediate and wider context. It will enhance the townscape character of the area, in particular by adding enclosure and legibility to Abbey Road and Belsize Road.
- 7.88 As illustrated in the views in section 8 of the HTVIA, the Proposed Development will be seen alongside Phases 1 and 2 of the Abbey Area Regeneration, contributing to the emerging identity around this junction. It will sit comfortably in its townscape context and will be seen as appropriately scaled mediating between the lower scaled townscape to the west and the larger scale to the east.
- 7.89 In conclusion, the HTVIA demonstrates that in respect of design and historic environment consideration the Proposed Development is in line with the policies and guidance set out in national, regional and local planning policy and guidance.

Residential Standards

- 7.90 All units have been designed to meet or exceed the National Technical Standards in terms of overall unit sizes and the internal space standards of individual rooms and storage space as set out in London Plan Policy D6. Existing floorspace and affordable housing floorspace has been calculated on the basis of Parker Morris space.
- 7.91 Ground floor private amenity is allocated to flats in the form of inset balconies. These are lined with a defensible area in the form of hard and soft landscaping and railings. The northernmost and southernmost flats both have access to a private garden, only accessible directly from the flat itself. Balconies are provided for all upper storey flats to a minimum of 5 sqm for a 1B2P flat, and 1 sqm additional area per bedspace above this. All balconies are a minimum depth of 1,500mm to facilitate wheelchair turning. The Site is not located within an area of open space deficiency within the Borough and there is good access to public open space including the Abbey Road Phase 2 open space,
- 7.92 The Mayor's Housing SPG outlines that where possible, the provision of dual aspect homes should be maximised in a development proposal. 60% of homes in the scheme are dual or triple aspect. For the remaining 40% single aspect homes, 91% of these homes have enhanced aspect with the introduction of bay windows which provide an alternative angled view out of living rooms. The quantum of triple and dual aspect homes were welcomed by the LBC officers, GLA officers and the DRP during the pre-application stages and the introduction of enhanced single aspect homes were encouraged. Please see section 4.2.8 of the DAS for full details.

Accessible housing

- 7.93 In accordance with London Plan Policy D7 (Accessible housing) a total of 15 wheelchair units (category M4(3)) are proposed across all tenures, which equates to 10.79% of all units.
- 7.94 Camden Living tenure and Social Rent tenure Wheelchair dwellings are proposed in Block A, Private Sale Wheelchair dwellings are provided in Blocks B and C. Category M4(3) Social Rent & Camden Living (Affordable Rent) units are to be designed, built and fitted-out as Wheelchair Accessible Dwellings to comply with Building Regulation M4(3)(2)(b).
- 7.95 Category M4(3) Private Sale units are to be designed and built as Wheelchair Adaptable Dwellings to comply with Building Regulation M4(3)(2)(a). All remaining units are to be Category M4(2).

Children's Play Space

- 7.96 London Plan Policy S4 states residential developments should incorporate high quality, accessible play provision for all ages, of at least 10 sqm per child. Play space provision should normally be provided on-site; however, off-site provision may be acceptable where it can be demonstrated that this addresses the needs of the development and can be provided nearby within an accessible and safe walking distances, and in these circumstances contributions to off-site provision should be secured by Section 106 agreement.
- 7.97 The required play space provided has been calculated using the GLA's 2019 play space calculator. A total of 675sqm of child play space is required.
- 7.98 The proposals provide 675 sqm of playspace. The play provision throughout the courtyard garden will cater for a wider range of ages of varying typologies. There will be designated areas of equipped play elements within the landscape whilst interspersed natural play features such as, log piles, play boulders and rolling level changes.
- 7.99 A varied play experience within a playable landscape setting will introduce all the various types of play skills such as: unoccupied, onlooker, independent, associative, cooperative, parallel, dramatic/fantasy, constructive, physical, competitive and symbolic play. These skills are fundamental to the growth and development of a child. Equipment will be a themed and coherent family of parts.
- 7.100 Although the courtyard garden is intended to be multigenerational in its distribution of play, the equipped areas and areas intended for younger groups are positioned within the centre of the site with unprogrammed open recreation meadow areas to the higher terrace and tucked into the habitat-rich rain garden area to the lower terrace.
- 7.101 Social gathering spaces for older children are located centrally within the courtyard to the hard landscape areas, tree planting providing shelter and focal point. There will be arrangements of seating, tables and informal games area.

Residential Amenity

Daylight and Sunlight

7.102 NPPF (2021) Paragraph 125(c) states that Local Planning Authorities should refuse applications which they consider fail to make efficient use of land for housing and in this context, authorities should take a flexible approach in applying policies of guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site.

- 7.103 Camden Amenity CPG (2021) sets out that while it support the aims of the BRE methodology for assessing sunlight and daylight LBC will consider the outcomes of the assessments flexibility where appropriate, taking into account site specific circumstances and context.
- 7.104 The Environmental Statement applies the BRE standard numerical guidelines for daylight and sunlight to existing surrounding buildings and sunlight to amenity spaces. A separate assessment has been undertaken to assess the internal light levels to the proposed residential units.
- 7.105 Daylight and sunlight provision to the new dwellings and sunlight to amenity spaces within the proposed development were assessed and this is set out in the report prepared by Delva Patman Redler. The potential effects of the proposed development on daylight and sunlight to surrounding residential properties and amenity spaces were also assessed.
- 7.106 The assessments were run using methodologies recommended in the BRE guide. The advice contained in the BRE guide is not mandatory, and its numerical guidelines should be interpreted flexibly. As the development contains housing, the NPPF and the Mayor of London's Housing SPG are relevant, which emphasise the need for flexible application of the BRE guidelines.
- 7.107 Camden's local planning policy specifically acknowledges that the BRE guidance has been developed with lower density suburban situations in mind and that the numerical guidelines should therefore be operated more flexibly in dense inner-urban locations within the borough.
- 7.108 The overall daylight adherence within the development is 74% for ADF and 71% for NSL, considering the alternative target guidance. For sunlight, the adherence percentage is 74% for the alternative target guidance. Many non-adherence results for both Daylight and Sunlight are the inclusion of inset or protruding balconies.
- 7.109The overall daylight adherence considering the impact on neighbouring properties is 91% for VSC and 88% for NSL. Both are high levels of adherence. In respect of sunlight, the overall adherence is 100%.
- 7.110 In conclusion, the layout of the proposed development is consistent with the Council's local planning policy on daylight and sunlight, particularly having regard to paragraph 123(c) of the National Planning Policy Framework and paragraphs 1.3.45 and 1.3.46 of the Mayor of London's Housing SPG.

Air Quality

- 7.111 London Plan Policy SI 1 relates to air quality and states that development proposals should not: lead to further deterioration of existing poor air quality; create any new areas that exceed air quality limits or create unacceptable risk of high levels of exposure to poor air quality. Part 2 of the policy requires development proposals to be at least Air Quality Neutral, to use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality.
- 7.112 An Air Quality Report (AQA) has been prepared by Hilson Moran and submitted as part of this application. This report presents the findings of the assessment, which addresses the potential air quality impacts during both the construction and operational stages of the Proposed Development. The assessment has been undertaken in line with the relevant policy and guidance, and where necessary, outlines the required mitigation measures to minimise impacts. A qualitative assessment of construction phase impacts has been carried out. There is a high risk of dust soiling and fugitive PM10 emissions affecting human health from demolition, a medium risk for earthworks, a medium risk for construction and a high risk from trackout. Through good site practice and the implementation of suitable mitigation measures, the impact of dust and PM10 releases will be minimised. The residual effect of the construction phase on air quality is therefore not significant.

- 7.113 A detailed assessment using ADMS-Urban has been undertaken to consider the impact of development generated road traffic on existing and proposed receptor locations. The findings of the assessment indicate:
- The impact on annual mean NO2, PM10 and PM2.5 concentrations at all existing receptors is
- classified as negligible;
- Annual mean NO2 concentrations are well below 60 μ g/m3 at all existing receptors, therefore exceedances of the 1-hour mean NO2 AQS objective is unlikely;
- There are no predicted exceedances of the daily mean PM10 at existing receptors; and,
- All proposed receptors are classified as APEC Level A for both long-term and short-term averaging periods with the Proposed Development operational.
- 7.114 Based on the findings of the assessment no mitigation is required and the Site is suitable for the introduction of the proposed receptor type. The overall residual effect for the operational phase is not significant.
- 7.115 The Proposed Development was found to be compliant in relation to Building and Transport emissions and is therefore air quality neutral. No mitigation or additional off-setting is required. Overall, with the inclusion of standard mitigation measures as best practice (construction phase only), the proposals would be compliant with legislation and policy.

Noise

- 7.116 Paragraph 180 of the NPPF, Policy D14 of the London Plan and Policy A4 of the Local Plan set out the requirements for measuring, mitigating and managing noise impacts, both internal and external.
- 7.117 RBA Acoustics have prepared the following reports in support of this application:
 - External Building Fabric Assessment
 - Acoustics, Ventilation and Overheating Level 1 Assessment
 - Level 2 Overheating Assessment
- 7.118 The nearest major source of groundborne vibration appears to be the railway which runs in excess of 50 metres to the south-east of the site. From extensive previous experience on similar sites, given the development site's distance from the railway lines we do not anticipate groundborne vibration due to train passbys would be detectable at the development site, and re-radiated noise from rail activities to be significantly below normal levels.
- 7.119 RBA Acoustics have also undertaken noise monitoring at the Site. The measured noise levels are presented within their report. The resultant noise levels have been used in the assessment of the glazing requirements to ensure suitable internal noise levels are achieved at the proposed development with reference to ProPG, BS 8233:2014 and WHO Guidelines.
- 7.120 RBA confirm that internal noise levels can be effectively controlled in line with the criteria presented in Section 4.0 by implementing the glazing configurations presented. Target specifications for glazing and ventilation are included in Appendix C to their report.
- 7.121 Plant noise emission limits have also been set in line with the requirements of Camden Council, although at this stage there is insufficient information available to undertake a detailed plant noise emission assessment. This can be undertaken when plant selections are made available.

- 7.122 Referring to the measured external levels given in the RBA Preliminary External Building Fabric Report it is considered there is a risk of noise issues associated with opening windows at the proposed development site. The extent to which opening windows is considered a reasonable method of avoiding overheating is heavily dependent on how often occupants are required to do so. As such, a Level 2 Assessment has been undertaken to establish the resultant internal noise levels and the frequency and duration that which windows are required to be opened for rapid ventilation and overheating purposes.
- 7.123 In the Level 2 Assessment, RBA conclude that it is clear from the duration that when the 'overheating condition' occurs will result in an internal level that is above the SOAEL threshold for all the units presented within this assessment should opening windows be relied upon to mitigate overheating. It is therefore recommended that alternative options are explored as a means to providing cooling to the apartments. A temperature lopping solution, with the inclusion of internal blinds has been put forward by the overheating assessor which will therefore remove the need to rely upon opening windows as the main method of mitigating overheating, and therefore preventing the risk of adverse noise conditions.

Sustainability and Energy Efficiency

- 7.124 The London Plan requires all major developments (residential and non-residential) to meet the net-zero carbon target. This should be met with a minimum on-site 35% reduction in carbon emissions beyond Part L of 2013 Building Regulations with any carbon shortfall to net zero being paid into the relevant borough's carbon offset fund.
- 7.125 The London Plan (Policy SI1, GG3, SI7) echoes these sentiments and seeks for London to become a zero-carbon city by 2050, through initiatives such as a low carbon circular economy, smart and adaptive design to mitigate against climate change as well as the use of green infrastructure and open space.
- 7.126 The applicant has appointed specialist consultants to carry out the relevant assessments and to work with the design team to ensure that the proposals will meet the highest environmental standards achievable.

Sustainability

- 7.127 The Sustainability Assessment Statement prepared by AECOM includes a Home Quality Mark One Assessment. The Home Quality Mark (HQM) credits contained in the Pre-Assessment allow the proposed homes on Site to target a score of 279 credits, which equates to a 4 Star Rating. In targeting a 4 Star Rating the Proposed Development is reviewing a wide range of sustainability initiatives, measures and practices which:
- Contribute to reducing energy and water demand
- Contribute to reducing the whole life carbon and implement the principles of the circular economy
- Mitigate impacts on biodiversity and the local environment, as well as enhance the biodiversity and landscape value of the Site
- Reduce reliance on combustion vehicles and encourage the use of more sustainable modes of transportation
- Implement measures to increase resilience to the predicted effects of climate change
- Contribute to the improvement of the health and wellbeing of building users; and
- Provide quality assurance to building users.
- 7.128 The HQM Assessments will continue during the next steps of the design, commencing with the HQM Design Stage Assessments of each home which will be followed by the Final (Construction) Stage Assessments.

7.129 The key National, Regional and Local planning policies in relation to sustainability have been a key consideration throughout the design. These policies have been reviewed and the Proposed Development has addressed them within the suite of documents submitted with this application.

Energy

- 7.130 A fabric first approach has been adopted to reduce energy demand and the Dwelling Fabric Energy Efficiency (DFEE) is less than the Target Fabric Energy Efficiency (TFEE) Part L 2013 target.
- 7.131 The building services will include energy efficient lights, optimised heat distribution and mechanical ventilation with heat recovery.
- 7.132 The domestic units are currently showing a Be Lean CO2 emission saving of 11.90%.
- 7.133 The non-domestic units are currently showing a Be Lean CO2 emissions saving of 25.38%.
- 7.134 Total on-site carbon reduction is currently targeting a 58.81% saving, exceeding the policy minimum of 35% saving.

Overheating

- 7.135 In compliance with Policy SI 4 of the London Plan, the GLA Cooling Hierarchy and the GLA Energy Assessment Guidance an Overheating Assessment has been prepared by AECOM.
- 7.136 By following the Good Homes Alliance (GHA) Early Stage Overheating Risk Tool and incorporating the key principles early within the design process, the following principles have been embedded within the design of the Proposed Development:
- Inset balconies on south facing facades (Blocks B and C) to reduce risk of overheating
- Efficient core design that maximises dual and triple aspect homes
- A chamfered balcony design to maximise length of inset balconies and enhance aspect of all homes, particularly in Block A.
- 7.137 Dynamic overheating modelling has been undertaken in accordance with CIBSE TM59 Overheating, and the recommendations have informed the design of window opening sizes. This modelling has been developed in conjunction with Noise, Air Quality, Daylighting, Operation Energy and Security measures, in a holistic environment strategy.

Whole life-cycle carbon assessment

- 7.138 In line with Policy S1 of the London Plan and the Whole-Life-Cycle Carbon Assessments Guidance (March 2021) a Whole Life-Cycle Carbon Assessment has been prepared by AECOM.
- 7.139 The advice and principles from this assessment have informed the design and specifications of the Proposed Development:
- Efficient structural design utilising off-site manufacture where feasible and recycled content
- Structural rationalisation including elimination of transfer beams or offset structure
- Materials that can be readily disassembled at the end of the building's life
- Self-finishing surfaces
- Repetition to minimise wastage and to provide potential for off-site manufacture
- Comparison methods to specify products with the best environmental credentials.

Circular Economy

7.140 In accordance with Policy SI7 of the London Plan and the Circular Economy Statement Guidance (March 2022), the Proposed Development promotes circular economy outcomes. A Circular Economy Statement has been submitted as part of the planning application submission to meet the specific requirements, for example demonstrating how materials arising from demolition and remediation works will be re-used and/or recycled, how the proposal's design and construction will reduce material demands, and how performance will be monitored and reported.

Environment

Trees

- 7.141 London Plan Policy G7 states that development proposals should ensure that, wherever possible, existing trees of value are retained. If planning permission is granted that necessitates the removal of trees, there should be adequate replacement based on the existing value of the benefits of the trees removed. Policy G7 further states that the planting of additional trees should generally be included in new developments.
- 7.142The trees on Site are not protected by a Tree Preservation Order, and the site is not in a Conservation Area, although immediately adjacent to the Conservation Area on its western boundary which protects a line of offsite trees overhanging the site. The scheme has the following impact:

Categorisation	Trees to be retained (on site)	Trees to be removed (on site)
Category A	2	0
Category B	2	5
Category C	0	9
Category U	0	0
Total	4	14

Trees to be retained	Trees to be removed	Trees to be planted	Net impact
4	14	38	Net gain of 24 trees.

Landscape and Public Realm

- 7.143 A landscaping strategy has been prepared by Fabrik and is included in Chapter 5 of the DAS.
- 7.144The Site is part of a wider story of estate renewal, Phase 3 of 3. The estate is partitioned by the 4 arms of the Belsize and Abbey Road intersection, to the north is Phase 2 with existing residential towers, park and proposals for a health and community centre. To the south across Belsize Road is the completed and occupied Phase 1.

- 7.145The three sites are distinct in their respective 'offers' in terms of open space, street activation and play, but what they share is the connective relationship through the road junction. The junction is the subject of a significant improvement by LB Camden that will improve the pedestrian experience through increased footway widths and new diagonal crossing arrangements across the junction.
- 7.146The design work for Phase 3 is happening in parallel with Phase 2 so there are opportunities to establish visual and thematic links between the projects. The massing within Phase 3 is set back from Abbey Road, this piece of public realm is valuable in the wider master plan as a landing stage between the three phases and a visual totem representing the centre of the Abbey Road Housing Cooperative.
- 7.147The site is a triangular shape, within the northern and western arms of Abbey Road and Belsize Road. The challenge is to create a landscape that at once holds the development together and responds to the sites prominent position at the junction, the levels and the boundary with the adjacent conservation area.
- 7.148 The concept seeks to define a traditional relationship between a building cluster set and a descending landscape setting.
- 7.149 The main defining features are the enclosing character of the buildings as they turn the corner, the charm of a character boundary wall which lends the backdrop to the space and exploitation of the levels.

7.150 Fabrik have distilled the landscaping theme into 4 core ideas;

- Protection
- Seclusion
- Terracing
- Congeniality
- 7.151 The garden will loosely follow the principles above in the identification of programme, planting and circulation.
- 7.152 The landscape design recognises the context and the interdependencies of the 3 Phases of the Abbey Area improvements and sets out the following principles:
- Creates a positive relationship to the proposed junction
- Exploits the setbacks provided by building articulation along both Abbey and Belsize Roads
- Protects ground floor habitable spaces with appropriate defensible measures and level changes
- Improving the transitory experience of journeys through the junction
- Establishing an address defining a 'place'
- Builds on the language of 'thresholds' across the 3 phases
- Retains key trees at the junction
- 7.153 In accordance with Public Open Space Camden Planning Guidance (2021) the Landscape chapter of the DAS also includes an assessment of open space, both within the Site and in its surroundings. In Phase 2 the Abbey regeneration there will be an improvement in both quality and quantity of open space and in Phase 3 (where there is no existing open space) there will be a gain of in private amenity space which will be provided for Phase 3 residents.
- 7.154 In addition, a Biodiversity Net Gain Assessment has also been carried out. The proposals currently result in a significant Biodiversity Net Gain of 100.6% and an Urban Greening Factor of 0.42, which exceeds the policy target of 0.4. This is in compliance with planning policy and the feedback received from LB Camden. The

landscape strategy includes a playspace strategy. The communal garden to the rear measures 1850sqm and will accommodate at least 675sqm of play. This is in line with the requirement set out by the Child Yield Calculator.

Ecology

7.155 Following the ecological assessment of the Site for the Proposed Development a number of potential impacts were identified including loss of habitat of low intrinsic ecological value and potential impacts to breeding birds and foraging and community bats. Measures have been incorporated into the Proposed Development to avoid or minimise potential effects and to prevent the contravention of legislation. As such there are no overriding reasons relating to nature conservation that would preclude development of the Site. Enhancement measures have also been put forward within this report specifically the inclusions of new biodiverse planting, green roofs, bird nesting and bat roosting provisions. This is in order to achieve biodiversity enhancements in line with National and local planning policy.

Biodiversity

- 7.156 In line with the Environment Act 2021, Chapter 15 of the NPPF and the biodiversity policies in the London Plan 2021 namely; Policy G1 Green Infrastructure, Policy G5 Urban Greening and Policy G6 Biodiversity and access to nature, a Biodiversity Net Gain Assessment has been carried out by Stantec. The Biodiversity metric 3.0 tool, published by Natural England in 2021 has been used to undertake the biodiversity metric calculations.
- 7.157 The results of the biodiversity metric demonstrate that the Proposed Development is predicted to deliver a net gain in biodiversity of 100.6% due to the removal of low value habitats and the creation of higher value habitat such as species rich grassland and urban trees. This far exceeds the 10% net gain required by the Environment Act 2021, which will become a legal requirement from November 2023.

Flood Risk and Surface Water Drainage Strategy

- 7.158 A Flood Risk Assessment and Surface Water Drainage Strategy has been prepared by Stantec.
- 7.159 In terms of the vulnerability of the Site and the Sequential Test; the proposals are for redevelopment of the site for a residential-led scheme, classified as 'More Vulnerable' as defined in Planning Practice Guidance (PPG) 'Flood Risk and Coastal Change' Table 2. However, due to the Site's location within EA Flood Zone 1, the Sequential Test is de facto passed. There is no requirement for the Exception Test to be carried out for this Site.
- 7.160The Site is located in Flood Zone 1 and as such has an annual probability of fluvial or tidal flooding of less than of 0.1%.
- 7.161 Stantec are aware of two flooding incidents in 2016 and 2018, along Belsize Road near the proposed development. This was reported to be a consequence of burst water mains. In addition, a large storm relief sewer flooded in July 2021. To mitigate flood risk associated with watermain or sewer flooding in the area, the floor levels of the proposed buildings have been set a suitable freeboard above the adjacent road carriageway.
- 7.162 Stantec conclude that the remaining sources of flood risk are considered to be a low risk.
- 7.163To help mitigate surface water flood risk associated with watermain or sewer flooding in the area and any flooding in the highway generally, proposals have been developed such that the finished floor levels are always higher than the adjacent back of public footway levels. Finished floor and external levels have been designed to direct water away from the proposed buildings and provide an exceedance flow route in order to mitigate the residual flood risk associated with excess surface water runoff in an extreme rainfall event. The

- surface water drainage strategy has been developed to mitigate surface water flood risk to the site for all events up to and including the 1% (1 in 100) Annual Probability (AP) events plus 40% climate change allowance.
- 7.164Stantec conclude that; the future occupants and users of the proposed development will be at a low risk of flooding and the development will not increase flood risk elsewhere. It is demonstrated that the proposal complies with the National Planning Policy Framework (NPPF), PPG, the regional planning policy and the local planning policy with respect to flood risk and is an appropriate development at this location.

Transport, Parking and Servicing

Car Parking

- 7.165 The Local Plan (Policies T1 and T2) and the London Plan (Policies D7 and T2) state that developments will be required to promote sustainable transport by prioritising walking, cycling and public transport and carfree developments. In addition, these policies promote vibrant, well-designed public realm, to encourage active travel.
- 7.166As a proposed car-free development, with the exception of a policy compliant 3% active provision of Blue Badge spaces, and a site with a PTAL rating of 6a (the second highest rating, with 6b being the highest). The Site is in a good position to promote the above transport and public realm policies. The key policies incorporated into the design are restrictions on overlooking, greening initiatives and Healthy Street Guidelines.
- 7.167 In compliance with policy, it is proposed that 5 disabled parking spaces will be provided on-street on Abbey Road and Belsize Road for residents. These spaces will replace the existing on-street bays. Any future provision will be provided on Belsize Road where 3 additional accessible on-street spaces can be provided within the kerb space outside the site. Any additional bays on top of this, if and when demand dictates, will need to be provided further southwest on Belsize Road. However, it is not envisaged that with such good accessibility to public transport and local amenities that all 10% of spaces will be required in future. In addition, 1 disabled parking space will be provided for the commercial unit in accordance with the London Plan. This will be located roadside on Abbey Road.

Cycle Parking

- 7.168 Cycle parking will be provided in accordance with the standards set out in the London Plan (2021) Table 10.2 as part of Policy T5 and London Cycling Design Standards (LCDS, September 2016). It is proposed that all blocks will provide cycle parking spaces, in convenient locations on the ground floor of the buildings.
- 7.169The development will provide a total of 252 long stay cycle parking spaces across each site. Block B will accommodate the highest number of spaces (106) with Blocks A and B also accommodating substantial spaces (88 and 58 respectively). Additionally, there will be 8 short-stay cycle parking spaces across the site.
- 7.170 The cycle stores will be secured and covered, only accessible with the use of a fob; therefore, preventing people from accessing the stores that do not live within the respective block, in accordance with the LCDS.
- 7.171 Chapter 8 of the LCDS also states that at least 5% of the total number of cycle parking spaces should be capable of accommodating a larger cycle. Accordingly, 12 of the proposed cycle parking spaces shall be enlarged bike spaces.
- 7.172 The long-stay spaces located within the cycle stores will be a mix of Sheffield stands and retractable stacked bicycle racks. Therefore, over half of the spaces will be on ground level and not require lifting.

- 7.173 The development will also accommodate 305.3 sqm of commercial floorspace shared between Blocks A and B. To allow for worst case scenario and to ensure sufficient cycle parking is provided, the cycle parking standards for the commercial units have been applied to the GEA for each unit, to determine the required quantum.
- 7.174 For the commercial space in Block A 1 long stay space will be provided and 6 short stay spaces. For the commercial space in Block B 2 long stay spaces will be provided and 12 short stay spaces. In total that's 3 long stay and 18 short stay.

Delivery and Servicing

7.175 Delivery and servicing vehicles will service the development from loading bays on Belsize Road and Abbey Road. These will be provided in addition to the existing loading bay provided outside Abbey Road Phase 1 on the opposite side of Belsize Road. The proposed loading layout allows for larger vehicles or multiple smaller delivery vehicles at one time. A plan showing the layout of these loading bays is provided in Figure 5-3 of the Transport Assessment. This plan has been agreed with LBC officers during the pre-application process, in terms of layout and refuse strategy. An outline Delivery and Servicing Plan has been included in Chapter 8 of the Transport Assessment.

8. Planning Obligations and CIL

Obligations

- 8.1 Section 106 of the Town and Country Planning Act 1990 allows the entering into of an obligation, by agreement or otherwise, between the local planning authority and any person interested in the land for the purposes of:
 - a) Restricting the development or use of the land in any specified way;
 - b) Requiring specified operations or activities to be carried out in, on, under or over land;
 - c) Requiring the land to be used in any specified way; or,
 - d) Requiring a sum, or sums to be paid to the local planning authority (or, in a case where section 2E of the 1990 Act applies, to the Greater London Authority) on a specified date or dates periodically
- 8.2 Regulation 122 of the Community Infrastructure Levy Regulations (2010) states that planning obligations may only constitute a reason for granting planning permission for the development if the obligation sis:
 - a) Necessary to make the development acceptable in planning terms;
 - b) Directly related to the development; and
 - c) Fairly and reasonably related in scale and kind to the development.
- 8.3 Paragraph 54 of the NPPF states that 'Local planning authorities should consider whether otherwise acceptable development could be made acceptable through the use of conditions or planning obligations. Paragraph 56 reinforces the requirement that planning obligations meet the tests set out in regulation 122 of the CIL Regulations.
- 8.4 As a matter of law, the Council cannot enter into or enforce a Section 106 Agreement Against itself. Where it is granted permission for its own development, Heads of Terms will be embodied in a "Shadow Section 106 Agreement". Although this cannot be enforced in court, it will document the requirements of the Heads of Terms in a similar form to a Section 106 Agreement and will be negotiated by separate lawyers within the Borough Solicitors Department. Senior representatives of the application department will sign a letter undertaking on behalf of the Council applicant that the Shadow Section 106 will be complied with. This letter will be noted on the Planning Register and compliance with the Shadow Section 106 will be monitored by Development Management officers in the same way as a Section 106 Agreement.

Community Infrastructure Levy

8.5 Under the terms of the Planning Act 2008 (as amended) and Community Infrastructure Regulations 2010 (as amended), the Mayor of London's Community Infrastructure Levy (MCIL2) and Camden Community Infrastructure Levy (HCIL) will be chargeable on this application commencement. This will be calculated in accordance with the Mayor's and Camden's adopted Community Infrastructure Levy Charging Schedules at the point of determination of that application.

London Borough of Camden CIL

8.6 The LBC CIL Charging Schedule was adopted in October 2020. The proposed development is liable for an estimated £1,723,659 contribution.

Mayoral CIL

- 8.7 The Mayoral CIL2 Charging Schedule was adopted in January 2019, coming into effect on 01 April 2019. The proposed development is liable for an estimated £621,344 contribution.
- 8.8 The required CIL Form (Additional Information Requirement Form) has been submitted with this application.

9. Planning Benefits

- 9.1 The Hybrid Consent (approved in 2014) included a number of benefits and improvements for the Abbey Road Estate. Phase 3 of the scheme, while being acceptable, when reassessed by the Applicant team in the current environment and policy context was considered to be capable of providing additional improvements and benefits.
- 9.2 The Full Planning Application for Phase 3 will deliver the final phase of the redevelopment of the Abbey Road Estate. The scheme will deliver a range of social, economic and environmental benefits to the local community, which is made of existing and new residents, and also visitors to the area.

Additional Homes

- 9.3 The Proposed Development will provide 139 much needed homes, helping to address Camden's shortfall in delivery of both market and affordable homes in recent years and optimising a brownfield site.
- 9.4 The new homes will be a mix of affordable and market tenures and will also provide a mix of unit sizes which cater for the housing need in Camden, compared to the existing building which provides a limited number of 1-bed and studio homes.
- 9.5 High quality design is central to the Proposed Development and all homes have been designed to be tenure blind.

Commercial Units

- 9.6 The Proposed Development will provide flexible commercial floorspace in a key location on the junction of Abbey Road and Belsize Road, along with public realm improvements to activate and make the most of this location.
- 9.7 The new units will be of a suitable size for retailers' needs and can provide local services to new and existing residents. The units are flexible in use and also in their arrangement, as both units are capable of subdivision. This adaptable design is a sustainable approach to providing refreshed commercial units in this location.

Public realm and landscaping

- 9.8 The proposals include a carefully prepared landscape and public realm design which will help to activate the junction of Abbey Road and Belsize Road and significantly improve the pedestrian experience along these roads. The proposals also include a significant net gain in the number of trees on Site.
- 9.9 The private gardens in the communal courtyard will provide a multi-generational space that residents can enjoy. There will also be visual connections with the private garden and the street, providing breaks between the buildings that enhance the street experience.
- 9.10 The landscape strategy includes a playspace strategy. The communal garden to the rear measures 1850sqm and will accommodate at least 675sqm of play.

Biodiversity and greening

9.11 A Biodiversity Net Gain Assessment has also been carried out by Stantec. The proposals currently result in a significant Biodiversity Net Gain of 100.6%, which far exceeds the 10% net gain which will be required by the

Environment Act from November 2023, and an Urban Greening Factor of 0.42, which exceeds the policy target of 0.4.

Energy and Sustainability

- 9.12 Sustainability principles have been an integral consideration in the design process of the Proposed Development.
- 9.13 A fabric first approach has been adopted to reduce energy demand and the Dwelling Fabric Energy Efficiency (DFEE) is less than the Target Fabric Energy Efficiency (TFEE) Part L 2013 target. Total on-site carbon reduction is currently targeting a 58.81% saving, exceeding the policy minimum of 35% saving.
- 9.14 Sustainable drainage has been incorporated into the design, with the provision of green/biodiverse roofs and permeable surfaces.
- 9.15 Overall, the scheme addresses the policy requirements for sustainable development, in response to the urgent need to take action to combat climate change and its impacts.

10. Summary and Conclusion

- 10.1 This Planning Statement has been prepared in support of the full planning application submitted to LB Camden for the provision of a new residential development, with ancillary flexible commercial floorspace, as the final element of the Abbey Road Regeneration.
- 10.2 The proposed new Health and Community Centre will replace the existing centres located on Phase 3 of the Abbey Area Regeneration. The design has developed through extensive consultation with local residents and key stakeholders, to ensure the provision of a high-quality buildings that will meet the needs of the community.
- 10.3 The proposals also include a landscape design that has been subject to consultation, to ensure that the new residents will be provided with multi-generational communal courtyard that serves their needs. The proposals also include improvements to the public realm along both Abbey Road and Belsize Road, truly integrating Phase 3 into the wider Abbey Road Regeneration.
- 10.4 In summary, the proposals provide an much needed housing in sustainable and high-quality buildings that will serve the borough and is compliant with local, regional and national planning policies.

Appendices

Appendix A – Site Location Plan



GENERAL NOTES: This drawing is © 2019 Pollard Thomas Edwards LLP (PTE). Use figured dimensions only. DO NOT SCALE. SETTING OUT NOTES:
All setting out to be confirmed on site prior to construction - any discrepancy must be immediately reported to the Architect.

All setting out to face of structure or to grid.

All dimensions are in millimetres unless noted otherwise.

All setting out to face of structure or to grid.

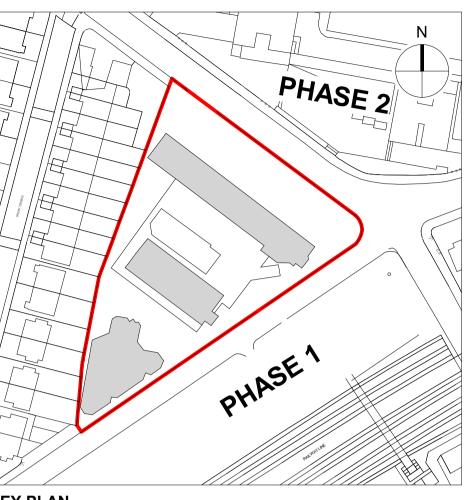
All partitions set out to studwork or structure.

This drawing must be read in conjunction with all other relevant drawings and specifications from the Architect and other consultants.

For setting out and specification of M&E services refer to M&E Consultants documents.

For setting out and specification of structure refer to Structural Engineer's documents.





- 27.04.22 Issued for Planning Submission

PLANNING

Diespeker Wharf 38 Graham Street London N1 8JX 020 7336 7777 forename.surname@ptea.co.uk

Pollard Thomas Edwards

Abbey Area Phase 3 **Existing Site Plan** ARR- PTE- ZZ-00-DR-A-10000

Appendix B – Planning History: Minor Material Amendments

LPA Reference	Description of development	Date of consent
2012/0096/P	Outline application for phased redevelopment of site to provide up to 296 residential (Class C3) units (including up to 133 affordable units), up to 1,300 sqm of commercial floor space (Class A1-A5), up to 1,055sqm of business floorspace (Class B1), up to 2,500sqm community and health floorspace (Class D1) and associated space for parking, plant, servicing, ancillary storage and energy centre, all in five buildings as follows: Block C (up to 2 and 3 storey community and health uses), Blocks A, B, D and E (predominantly up to 6 and 7 storeys residential and commercial uses) and Block A (up to 6 to 12 storeys of residential and commercial uses); provision of open space and landscaping; alterations to existing highway layout and creation of new vehicular and pedestrian access routes; all following demolition of Belsize car park building, Abbey Coop Community Centre and Hinstock and Emminster blocks (including Belsize Priory Health centre, residential and commercial units), site-wide walkways and pedestrian railway bridge. Application provides detail for approval of layout and access only and not scale, appearance or landscaping. Approved 12th July 2012.	July 12 2012
2013/4678/P	Hybrid application for phased redevelopment of site, comprising detailed application for Phase 1 and outline application for layout and access only for Phases 2 and 3 (scale, appearance and landscaping are reserved matters). Full details provided for Phase 1 comprising: up to 141 residential units (including up to 66 affordable units) in a 14 storey tower and 6 storey block, with 522.5 sq m of retail floorspace (Class A1) and 398.9 sq m of flexible commercial floorspace (Classes A1-A5 and B1) at ground floor and associated space for parking, plant, servicing, ancillary storage and energy centre at basement level. Phase 1 includes open space and landscaping, alterations to existing highway layout and creation of new access routes, following demolition of the Belsize Road car park building. Phase 2 to comprise up to 2,500 sq m of community and health uses (Class D1) and up to 126sqm of office space (Class B1) in a two-storey building following demolition of existing high-level walkways. Phase 3 to comprise up to 85 residential flats in 6/7 storey blocks and 15 mews houses (including up to 48 affordable units), up to 120sqm of office space (Class B1) and up to 645sqm of flexible commercial floorspace (Classes A1-A5) and associated ancillary space for parking, plant and servicing in basement. Phases 2 and 3 include open space, landscaping, alterations to existing highway layout and new access routes. Phase 3 to follow the demolition of the Abbey Community Centre and Hinstock and Emminster blocks including Belsize Priory Health and Medical centre,	16 May 2014

	residential and commercial units and site-wide walkways. Approved 16th May 2014	
2015/1636/P	Amendment to Condition 31, part (a) of planning permission 2013/4678/P (for comprehensive phased redevelopment of site) granted on 16/05/14 to increase the maximum gross external area (GEA) of the market housing floorspace approved (excluding the basement car parking space) from 5,385sq.m GEA to 5,632.8sq.m GEA.	8 June 2015
2015/7204/P	Erection of two new buildings within Class D1 to accommodate a new Health Centre and Community facility on land adjoining the Snowman and Casterbridge blocks on the Abbey Road Estate. The total development comprises 3143sqm (GIA) and includes improvements to the open space, landscaping and existing car parking with alterations to existing highways layout and new access routes. This application forms part of the wider redevelopment of the Abbey Road Estate and comprises land originally identified in Outline Planning Permissions 2013/4678/P dated 16 May 2014.	WITHDRAWN
2015/1958/P	Amendment to Condition 75 (car capped) of planning permission 2013/4678/P (for comprehensive phased redevelopment of site) granted on 16/05/14 to exclude returning residents of Hinstock or Emminster already in possession of a Residents Parking Permit.	17 June 2017
2016/4578/P	Variations to Conditions 6 (Phase 1:Approved drawings), 11 (Phase 1: Refuse and recycling) and 81 (Plant areas) of planning permission 2013/4678/P (for comprehensive redevelopment of site) granted on 16/05/14, as amended by permissions 2015/1636/P granted on 08/06/2015 (amendments to Condition 31 quantum of Phase 3 housing), 2015/1958/p granted on 17/06/2015 (amendments to Condition 75 car capping) and 2015/5417/P granted on 10/11/2015 (amendments to condition 74 car parking); to include amendments relating to altering substation and refuse store locations, installation of plant at 12th floor and minor alterations to elevations at ground and upper floors and rear boundary wall.	11 May 2017
2017/2523/P	Variation of conditions 6, 10, 20, 26, 93 and 94 relating to Phase 1 of planning permission, 2013/4678/P (for comprehensive redevelopment of site) granted on 16/05/14. The amendments are namely; - changing glazed brickwork at residential entrances from green to red, - changing design of metal balustrades, privacy screens and soffits - Elevational amendments	12 April 2018

	 Changing railway boundary from timber to brick with railings Additional photo-voltaic panels Addition of brick vents Changing the trigger for conditions 93 & 94. 	
2020/2486/P	Construction of a new health and community centre (Use Class D1), relocation of existing residential car park, along with landscaping, associated access, demolition of link bridge between Phases 2 and 3, and cycle parking. Approved 27th June 2020.	27 November 2020
2019/0696/P	Variation of conditions 4 (Implementation of Phase 2), 5 (Implementation of Phase 3), 14 (play space) and 60 (CHP) of application reference 2013/4678/P dated 16/05/14 as amended by 2016/4578/P and 2017/2523/P for hybrid application for phased redevelopment of site, comprising detailed application for Phase 1 and outline application for layout and access only for Phases 2 and 3 (scale, appearance and landscaping are reserved matters). Variation namely to change the trigger for providing the playspace to until February 2022 and to amend the type of CHP.	9 December 2020

Appendix C - Relevant Planning Policies

The below provides a summary of the key relevant planning policies.

Strategy for Growth

- The Local Plan commits the Council to the creation of conditions that shall allow for growth to deliver homes, jobs, infrastructure and facilities in order to meet Camden's identified needs. This is laid out in Policy G1 of the Local Plan. The Council will deliver this by:
 - Supporting development that makes best use of its sites by understandings quality of design, surroundings, sustainability, amenity, heritage, transport accessibility and any other considerations relevant to the Site:
 - Resisting development that does not make efficient use of Camden's limited land;
 - Accommodating for mixed-use developments, specifically in areas that are highly accessible,
 with the inclusion of an element of self-contained housing where possible; and
 - Supporting a variety of uses, be that on-site or across multiple sites as part of an agreed coordinated development approach, where it can be demonstrated that this contributes towards achieving strategic objectives and delivers the greatest benefit to the key priorities of the borough.
- The key objectives of the Local Plan are set out below. Developments are expected to contribute towards achieving these objectives by 2031:
 - 16,800 additional homes (Policy H1);
 - 6950,00sqm of office floorspace (Policy E1); and
 - C30,000sqm of retail floorspace (Policy TC1).
 - Development to achieve such goals will occur across the entire borough, however, the following areas are where the most growth is expected to take place;
 - The growth areas (Kings Cross, Euston, Tottenham Court Road, Holborn, West Hampstead Interchange and Kentish Town Regis Road); In highly accessible areas; and The Council's Community Investment Programme (CIP).
- Such a strategy for growth complements London Plan's Policy GG1 which is focused on building strong and inclusive communities. It states that good growth is inclusive growth, asserting that it is essential that those involved in planning and development should:
 - Encourage early and inclusive engagement with stakeholders;
 - Ensure that changes to the physical environmental offer an overall positive contribution to London;
 - Provide access to good-quality community spaces, services, amenities and infrastructure that encourage active participation and work towards strengthening communities and reducing social isolation;

- Strive to allow for London to continue to generate a wide range of economic opportunities that everyone is able to participate in;
- Ensure that the public realm is designed with people in mind to create safe and welcoming spaces, where communities can flourish;
- Promote the role of town centres to allow for the civic, cultural, social and economic benefits that can come from them, and plan for places that allow for connections and relationships to be built in the daytime, evening and night;
- Ensure that developments create spaces that are designed to reinforce identity, legibility and inclusivity of neighbourhoods;
- Create a city that is inclusive and adaptable to different needs and one that is welcoming; and
- Support an inclusive London where barriers and inequalities are challenged and minimised.
- Building on this, Policy GG2 of the London Plan states that developments must ensure that sufficient high-quality and affordable housing, and physical and social infrastructure is provided to ensure the continuation of London's growth.
- Policy GG4 is focused on delivering a housing market that works better for all Londoners, therefore, this supports the strategic target of 50% of all new homes being genuinely affordable, the creation of good quality homes that meet high standards of design and provide for identified needs, including the provision specialist housing.
- The National Planning Policy Framework (NPPF) explores this concept of good growth through the overarching concept of sustainable development. Paragraph 7 of the NPPF summaries this as meeting the needs of the present without comprising the ability of future generations to meet their own needs. Within sustainable development, there are three overarching aims (paragraph 8): an economic objective, a social objective, and an environmental objective.

Proposed Residential Units

- The Local Plan (Policy H1) aims to secure a sufficient supply of homes that will allow Camden to meet the needs of existing and future households. This policy aims to maximise the supply of housing in order to exceed the target of 16,800 addition homes between 2016 and 2031. This aligns with the National Planning Policy Framework that requires that Camden meet the housing needs for the area. The need for the area is outlined in the joint assessment of housing needs (Strategic Housing Market Assessment or SHMA) that was commissioned by the Boroughs of Camden and Islington. The objective of such policy is mirrored in We Make Camden. Page 43 states their mission to ensure that "Camden has enough decent, safe, warm, and family-friendly housing to support our communities". The aim of this mission is to ensure that all Camden residents have access to housing that supports good health, that enables individuals and families to flourish. Here, the council commits to increasing the supply of genuinely affordable, family-sized, and social rented homes by building as many as they can themselves.
- Policy H1 states that Camden will support applications that focus on the provision of self-contained homes, seeing self-contained homes as a priority of the Local Plan. The Local Plan asserts that self-contained homes have the greatest potential to satisfy a variety of household types, and additionally, have the ability to provide a reasonable standard of privacy and amenity.
- In addition, Policy H1 of the Local Plan requires that where sites are underused or vacant, maximum reasonable provision of housing that is compatible with any other uses needed on the Site is expected.

Policy H2 expands on this, stating that developing a mix of uses on individual sites can be beneficial for a number of reasons. This could include:

- Reducing the need for individuals to travel between homes, jobs and services;
- Increasing the safety within a community by providing a range of activities or uses;
- Creating areas that are diverse, distinctive and attractive;
- Allowing for the efficient use of land. This would typically see ground floor uses having active frontages, and upper levels providing homes.
- Therefore, to support the existing mixed-use character of the borough, the Local Plan supports mixed-use developments that maximise the provision of self-contained homes, while contributing to the mixed-use and diverse character of the area.
- Policy H3 of the Local Plan focuses on the protection of existing floor space by opposing development that would involve a net loss of residential floor space, opposing the permanent conversion to short-stay accommodation intended for the occupation of fewer than 90 days, and resisting development that would involve the net loss of two or more homes (unless they create larger homes in an area where this is required, enable existing affordable housing to be adapted to provide the affordable dwelling-sizes that are needed; or enable sub-standard units to be enlarged to meet residential space standards).
- Following from this, Policy H4 of the Local Plan directly relates to self-contained units, including self-contained live-work units and houses under multiple occupations who are long term residents but not a family. Policy H4 aims to maximise the supply of affordable housing in order to exceed the borough-wide strategy of reaching a strategic target of 5.300 additional affordable homes between 2016/17 and 2030/31, additionally this policy aims to provide an appropriate mix of affordable housing types to meet the needs of households that are unable to access the housing market. In order to provide this, the council except a for contribution towards affordable housing from all developers that provide one or more additional floor space and that involves a total addition to floor space of 100sqm GIA or more. The council will negotiate the maximum reasonable amount of affordable housing that should be provided from a development on the following basis:
 - Guidelines for the mix of affordable housing types is given at 60% social-affordable rented housing and 40% immediate housing;
 - Targets are based on an assessment of development capacity whereby 100sqm (GIA) of house floorspace is considered enough capacity to create another home;
 - Targets are based on additional floorspace proposed, not existing floorspace or replacement floorspace;
 - A sliding scale applies to developments that have the ability to provide one or more additional homes and have the capacity for fewer than 25 additional homes, this starts at 2% for one home and increasing by 2% for each home added to capacity;
 - An affordable housing target of 50% applies to developments that have the capacity for 25 or more additional dwellings;
 - Where a development has the capacity for 25 or more additional homes, the council may seek affordable housing specifically for older or vulnerable people as part of their overall affordable contribution:

- In contrast, where development has the capacity for fewer than 10 additional dwellings, a payment-in-lieu may be acceptable;
- A development with capacity for 10 or more additional dwellings, affordable housing is expected to be delivered on-site;
- Where it is not practically possible to provide affordable housing on-site, or the provision of it off-site would be better, the council may accept a payment-in-lieu.
- Policy H4 goes on to states that where development sites are split or separate proposals are brought forward for related sites, the appropriate contribution of affordable housing can be comprehensively assessed for all the Sites put together. In considering the provision of affordable housing and how this should occur for development, the Council will consider a plethora of factors, including, but not limited to: the character of the development, site and surrounding area, the size of the Site, the surrounding provision of public transport, amenities, employment, and community facilities, the economic viability, and the impact of the development on the creation of mixed, inclusive and sustainable communities.
- Policy H5 builds on this, by focusing on the protection and improvement and existing affordable housing. Policy H5 of the Local Plan states that the Council will aim to secure sufficient high-quality affordable homes of varying types and sizes to meet the needs of existing and future Camden households. This will be achieved through the creation of mixed, inclusive and sustainable communities (as if referred to in Policy H4), through the following means;
 - The regeneration of existing estates and the provision of more and better affordable homes at an appropriate density through the Community Investment Programme and Better Homes Programme;
 - Protecting existing affordable housing floorspace of all types.
- In addition to this, Policy H6 of the Local Plan looks at minimising social polarisation and the creation of mixed, inclusive and sustainable communities through the production of high-quality and accessible homes that meet the housing needs of Camden's existing future households. Therefore, this policy seeks to encourage high-quality design to provide functional and adaptable space, minimum space standards for self-contained homes, the provision of homes that are adaptable and accessible. Additionally, this policy seeks to encourage a diverse mix of homes to be delivered on the market to meet a wide variety of housing needs, promote. On sites that are larger than 0.5 ha the Council would aim for the provision of particular housing needs, this could include student housing, housing for the vulnerable or elderly, or plots to provide for self-builders.
- Policy H7 of the Local Plan details that in order to meet the council's desire to provide a wide range of different sizes of homes that will allow for the creation of mixed, inclusive and sustainable communities, all housing developments are expected to meet the priorities set out in the Dwelling Size Priorities Table and include a variety of small and large homes. A flexible approach will be applied to in assessing the mix of dwellings that are proposed for a developments. Considerations will be given to
 - The dwelling size priorities for social-affordable rented, immediate and market homes;
 - Evidence of local needs:
 - Character of the Site, and the surrounding area;
 - Size of the Site and constraints of this;
 - Economic viability of the development; and

- The extent to which flexibility around the mix of market homes could secure the delivery of additional affordable homes.
- Policy H8 of the Local Plan looks specifically at the provision of appropriate homes for older, homeless, and vulnerable people to ensure that they are able to live as independently as possible.
- Within the London Plan, Policy H1 addresses how the housing supply will be increased, and sets out 10-year targets for net housing completions that each borough should plan for. Policy H1 states that boroughs are required to optimise housing delivery by encouraging development in sites with public transport levels at PTAL 3-6 and mixed-use redevelopment of car parks.
- Further this, Policy H4 of the London Plan sets out the strategic target for 50% of all new homes to be genuinely affordable. This requires that major developments follow the threshold approach laid out in Policy H5. This threshold approach means that affordable housing on gross residential development is initially set at a minimum of 35%, 50% for public sector land where there is no portfolio agreement with the mayor or 50% strategic industrial locations, locally significant industrial sites, and non-designated industrial sites that are appropriate for residential development in accordance with Policy E7 Industrial intensification, colocation and substitution where the scheme would result in a net loss of industrial capacity.
- Affordable housing tenure is laid out in Policy H6 of the London Plan, this states that:
 - A minimum of 30% low-cost rented homes, as either London Affordable Rent or Social Rent, allocated according to need and for Londoners on low incomes;
 - A minimum of 30% intermediate products which meet the definition of genuinely affordable housing, including London Living Rent and London Shared ownership;
 - The remaining 40% to be determined by the borough as low-cost rented homes or intermediate products (defined in Part A1 and Part A2) based on identified need.
- Policy H8 addresses the loss of existing housing and estate redevelopment. It sta es that existing housing should be replaced by new housing at existing or higher densities with at least the equivalent level of overall floor space. Such demolition of affordable homes should not be permitted unless it is replaced by an equivalent amount of affordable housing floorspace. Affordable housing that is replacing social rent housing must be provided as social rent housing where it is facilitating a right of return for existing tenants. Where affordable housing that is replacing social rent housing is not facilitating a right of return, it may be provided as either social rent or London Affordable Rent housing. Replacement affordable housing should be integrated into the development to ensure mixed and inclusive communities.
- Policy H10 states that schemes are expected to consist of a range of unit sizes. To decide on such a mix, the following should be taken into consideration;
 - Robust local evidence:
 - The requirement to deliver mixed and inclusive neighbourhoods;
 - The requirement to deliver a range of unit types at varying prices;
 - The proposed mix of uses on site;
 - The proposed range of tenures in the scheme;
 - The nature and character or the Site and its wider location;
 - The aim to optimise housing potential;

- The ability of new development to reduce pressure on conversion, sub-division and amalgamation of existing stock;
- The need for family housing, and the role of the one and two-bedroom units in freeing up family housing.
- The London Plan states in Policy GG4 that developments must ensure that homes are delivered; support the delivery of 50% of all new homes being genuinely affordable; create diverse and inclusive communities with good quality homes for a multitude of needs.

Proposed Flexible Commercial Units

Public Houses

- Policy C4 is focused on the protection of public houses that are of community, heritage or townscape value. This policy states that the council will not grant planning permission for the change of use, redevelopment, and/or demolition of a public house unless it is demonstrated that:
 - The proposal would not result in the loss of pubs which are valued by the community unless they are equivalent premises available capable of meetings the communities needs that were being served by the public house; or
 - There is no interest in the continued use of the property or site as a public house and no reasonable prospect of a public house being able to trade from the premises over the medium term.
- The policy goes on to state that if a public house is converted into an alternative use, the council will seek the retention of features that are of historical or character significance. Applications that involve the loss of pub floorspace, including facilities that are ancillary to the operation of the public house, will not be welcomed by the council if this development will adversely affect the operation of the public house. Furthermore, if it has been demonstrated that a public house can no longer be retained, the premise should be primarily considered for community uses if there is a defined need in the area before alternative uses are considered. If a pub is a heritage asset, any development should be considered in an appropriate manner to the significance of the property's heritage. To conclude, Camden state that they will support the provision of new public houses in appropriate sites in growth areas, highly accessible area and town centres.
- The London Plan addresses public houses in Policy HC7. This policy states that boroughs should protect public houses when they have heritage, economic, social, or cultural value to local communities, or where they contribute to relevant policy objectives. It states that boroughs should also support proposals for new public houses if they would contribute to the local economy or mixed-use development while considering the negative impacts that can occur. Further, to this Policy HC7 states that if applications propose the loss of public houses with heritage, cultural, economic or social value, they should be refused unless there is authoritative marketing evidence that demonstrates that there is no realistic prospect for the business.
- Public houses are addressed in paragraph 93 of the NPPF. It is stated that planning policies and decisions should plan positively for the provision and use of shared space, community facilities (including public houses) and other services. This will enhance the sustainability of communities, and ensure the provision of social, recreational and cultural facilities and services within communities.

Other Commercial Uses

Policy E1 of the Local Plan aims to secure a successful and inclusive community in Camden. The Council will
achieve this through the creation of conditions for economic growth, alongside, the harnessing of the
benefits for local residents and businesses. This will occur through the support of businesses of all sizes, by

maintaining a stock of premises of a variety of sizes and suitable for a number of uses, through supporting local employment and enterprising activity, encouraging the concentration of sectors and growth areas, and supporting specific industries that exist. Policy E2 discusses this further stating that the council ill resist development of business premises and sites for non-business use unless it is demonstrated to the Council's satisfaction that that the Site of building is no longer suitable for business use, or that the possibility of retaining, reusing and redeveloping the Site for such uses is not appropriate at this time.

Transport

- Policy T1 of the Local Plan is focused on the promotion of sustainable transport through the prioritisation of walking, cycling and public transport. This policy supports proposals that will improve the pedestrian experience through improvements in the public realm and the pedestrian environment, the creation of a permeable landscape that is adequately lit and providing high-quality pavements which are adequate for individuals with a variety of needs. Policy D1 of the Local Plan and Camden Planning Guidance on Design and Camden Planning Guidance on Transport presents Camden's approach to the provision of an attractive public realm. This objective is also promoted by We Make Camden. Page 51 f the document states that the Council are committed to continuing to invest in active travel, and continuing to improve public spaces to encourage more people to walk and cycle, and to make our streets more accessible.
- Additionally, to support cyclists and uptake in cycling across the borough, Policy T1 requires that developments:
 - aims to ensure that developments provide for and make contributions towards connected, high
 quality, convenient and safe cycle routes. This is in line with the guidance that is presented in
 the London Cycle Design Standard;
 - provide accessible and secure cycle parking facilities that exceed the minimum standards that are laid out in the London Plan and design requirements that are presented in the Camden Planning Guidance on transport;
 - Make provisions for high-quality facilities that promote cycle usage. This could be in the form of changing rooms, showers and secure lockers;
 - Create a landscape that is easy and safe to traverse through by a cyclist; and
 - Contribute towards bridges and water crossings suitable for cycle use where appropriate.
- Policy H1 offers guidance on how to promote the provision of public transport in the borough and contribute to required improvements in the bus network. The Council aims to provide required growth and improvements in public transport through planning obligations, with the majority of these in Camden going towards bus network infrastructure. This will apply in cases where the demand for bus services will increase beyond the existing capacity by the development. Details of public transport contributions are presented in Camden Planning Guidance on planning obligations. Developments may also need to cater for passenger interchange facilities that provide for the coordination of arrival and departure timetabling on different services.
- Policy T3 of the Local Plan states that the council aims to continually improve the transport infrastructure that is on offer in the borough, and therefore, they will not permit developments that are contrary to the safeguarding of strategic infrastructure improvement projects; and they will protect existing and proposed transport infrastructure, particularly routes and facilities for walking, cycling and public transport, from removal or severance.
- The London Plan (April 2020) lays out what is required of a development in regard to transport; Within the London Plan, Policy T1 states that all developments proposals should support the Mayor's strategic target of

80% of all trips within London being made via foot, cycle or public transport by 2041. Furthermore, all developments should make efficient use of land, this should reflect the connectivity and accessibility of the Site in regard to public transport, walking and cycling routes. Finally, all impacts on transport networks by development proposals should be mitigated. This relates closely to Policy GG2 which explores how developments can make the best use of land. Policy GG2 of the London Plan states that developments should prioritise sites that are well-connected by existing or planned public transport.

- Policy T2 of the London Plan goes on to discuss the Healthy Streets approach. This aims to improve health, reduce inequalities, reduce car dominance, ownership, use, road danger, severance, vehicle emissions and noise; increase walking, cycling and public transport use; improve street safety, comfort, convenience and amenity; and support these changes through thoughtfully produced freight facilities. Healthy Streets also aims to improve the balance of space that is given over to people to utilise to ensure that space is used more effectively. Policy T2 goes on to state that development proposals will have to demonstrate how they will deliver improvements that support the Healthy Street agenda, through reducing dominance and reliance on vehicles and creating a permeable and connected network for more sustainable forms of public transport. This links closely to Policy GG2 of the London Plan which asserts that successful sustainable mixed use developments should ensure that good walking, cycling and public transport connections exist to support the target of 80% of all journeys utilising sustainable travel and enabling car-free lifestyles.
- Furthering this, Policy T3 states that developments should create transport policies and projects to support the sustainable development of London. This would mean that land would be provided for the development of current and expanding public and active transport systems (this includes safeguarding existing sites, new sites and current networks). Additionally, Policy T4 expands on this, stating that when required in line with policy, Transport Assessments should be submitted alongside proposals to ensure that the impact of such a development on the transport network (this include pedestrian and cycle networks) is fully assessed. This will identify where mitigation is required to avoid the development having adverse effects on transport. Mitigation will either be required through the provision or through contributions. Policy T4 concludes by stating that the ability of a development to cater for the increased travel demand, through the provision or contribution is a contingent factor in receiving planning permission, and the cumulative impact of a development on public transport, road network and safety is required to be taken into account.
- Specifically relating to cycling, Policy T5 of the London Plan demonstrates how all development proposals should encourage cycling through creating an environment that is healthy and safe. This includes supporting the delivery of new routes and improved infrastructure and through the provision of adequate and secure cycling parking. This should align with the guidance laid out in the London Cycling Design Standards.

Parking and Car-Free Development

- Policy T2 of the Local Plan limits the availability of parking and requires that all new developments be carfree. The Council will implement that through the following actions:
 - Not issuing on-street or on-site parking permits in connection with new developments and use legal agreements to ensure that future occupants are made aware of such limitations on their entitlement to on-street parking permits;
 - On-site parking will be limited to spaces designated for blue-badge holders and/or essential operations or servicing needs;
 - Through the promotion of existing car-parks for alternative uses; and
 - Resisting development of boundary treatments and gardens to provide vehicle cross-over and on-site parking.

The London Plan lays out the policies in place which designate developments as car-free. The London Plan explains that all new residential developments in the borough are required to be car-free. This means that the only car-parking spaces available on-site are reserved for disabled people, or for businesses and services that require them, where this is integral to their nature, operational and/or servicing requirements. It also means that all current and future occupiers of the Site are not entitled to on-street parking permits.

Servicing and Deliveries

- Furthermore, the sustainable movement of goods and materials is addressed by the Council in Policy T4. This policy states that Camden aim to minimise the movement of goods and materials by road. To do this they will encourage the movement of goods and materials by canal, rail and bicycle where possible; protect existing facilities for waterbourne or freight traffic and promote the provisions and use of freight consolidation facilities. Additionally, any development that exceeds 2,500sqm is likely to generate significant, pavement of goods or materials by roads. This is true both during construction and operation. Thus, such developments will be expected to minimise the impact of freight movement via road by prioritising the use of the Transport for London Road Network or other major roads; accommodate goods vehicle son site and provide Construction Management Plans. Delivery and Servicing Management Plan and Transport Assessments where appropriate. Further information on these documents is provided in Policy A (Managing the impact of development) and Camden Planning Guidance supplementary planning documents on transport, amenity and planning obligations.
- The London Plan's Policy T7 illustrates how developments should comply with the plan in regard to deliveries, servicing and construction: Policy T7 states that developments should facilitate the sustainable movement of freight by rail, waterways and roads, with the inclusion of freight strategies that will aim to reduce the freight trips to and from the areas; coordinate the provision of infrastructure and facilities to manage freight at an area-wide level; and reduce road danger, noise, and emissions that occur from freight. In addition, development proposals should facilitate clean, safe and efficient deliveries and servicing, s well as adequate provision of space. This should be laid out in Construction Logistics Plans and Delivery and Servicing Plans. These should be produced in a way that reflects the scale and complexities of the development, and it is noted that during the construction of the development, inclusive and safe access for pedestrians and cyclists should be prioritised and maintained as a matter of priority.

Amenity

Amenity is essential to protect in order to ensure a high-quality of life for occupiers and neighbours, therefore, Policy A1 of the Local Plan states that permission will not be granted for developments, if there is unacceptable harm caused to the amenity. Policy A1 states that the Council will;

- Ensure amenity is protected for all;
- Ensure that all development contributes towards a strong and successful community. This can
 be achieved through balancing the needs of the development and the existing needs of the
 community;
- Resist development that does not adequately address and assesses transport impacts affecting communities, occupiers, neighbours and the existing transport network;
- Require mitigation measures when it is considered necessary.

In protecting amenity, the factors that will be considered are;

- Visual outlook, privacy;
- Sunlight, daylight and overshadowing;

- Artificial lighting levels;
- Transport impacts;
- Impacts of the construction;
- Noise and vibration levels;
- Odour, fumes and dust;
- Existing microclimates;
- Contaminated land;
- Impacts that could occur on water and wastewater infrastructure.

Landscaping, Public Realm and Open Space

- Policy GG3 of the London plan focusses on improving Londoner's health and the reduction of health inequalities within the city. To ensure this is possible, it states that developments should ensure that the wider determinants of health are addressed within a development to create a coordinated and systematic approach to improving the mental and physical health of Londoners and reducing health inequalities. This policy goes on to state that developments must provide access to high-quality green spaces and green infrastructure.
- The provision of open space is directly addressed through Policy A2 of the Local Plan. This lays out the Councils commitment to protect, enhance and improve access to Camden's parks, open spaces and other green infrastructure. This policy lays out the means to protect open spaces, and specifically states that spaces that are non-designated, but that offer nature conservation, townscape and amenity value should be protected where possible. This could include green infrastructure, such as trees, gardens and green roofs. Policy A3 takes this further, by stating that the council will seek to protect and secure trees and vegetation. This policy states that the Council will:
 - Resist the loss of trees and vegetation of significant amenity, historic, cultural or ecological value (including proposals that may threaten the continued well-being of the trees and vegetation);
 - Require that trees and vegetation which are to be retained to be protected through the phases
 of demolition and construction, in line with BS5837:2012 'Trees in relation to Design, Demolition
 and Construction' and positively integrated as part of the Site layout;
 - Where the loss of trees or vegetation occur, replacements should be provided; and
 - Expect developments to incorporate additional trees and vegetation where possible.
- The public realm is also address in We Make Camden. Page 47 of this document asserts the goal to ensure that Camden's estates and their neighbourhoods are healthy, sustainable and unlick creativity. This states the importance of the public realm, and parks and open space in ensuring good health and wellbeing for residents of Camden.

Noise and Vibration

 Policy A4 of the Local Plan illustrates how the Council aim to ensure that noise and vibration is controlled and managed throughout the borough. It states that all developments should consider Camden's Noise and Vibration Thresholds and permission will not be granted for developments that produce unacceptable noise and vibration impacts, developments that are sensitive to noise that is proposed in locations that have existing high noise levels, unless appropriate attenuation measures can be provided.

- Policy D14 of the London Plan addresses noise. It states that residential proposals should manage noise through the following means:
 - 1) avoiding significant adverse noise impacts on health and quality of life
 - 2) reflecting the Agent of Change principle as set out in Policy D13 Agent of Change
 - 3) mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on existing noise-generating uses
 - 4) improving and enhancing the acoustic environment and promoting appropriate soundscapes (including Quiet Areas and spaces of relative tranquillity)
 - 5) separating new noise-sensitive development from major noise sources (such as road, rail, air transport and some types of industrial use) through the use of distance, screening, layout, orientation, uses and materials in preference to sole reliance on sound insulation
 - 6) where it is not possible to achieve separation of noise-sensitive development and noise sources without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through applying good acoustic design principles
 - 7) promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver.

Access

Camden's Local Plan's Policy C6 addresses how the Council aims to promote fair access and the removal of barriers that would prevent individuals from accessing facilities and opportunities. In order to address this, the Council expects that all buildings and places should meet the highest practicable standards of accessible and inclusive design so that they can be used as safely and easily and with dignity by all. In addition, the Council expects that all facilities should be located within the most accessible areas of the borough, whiles the spaces that exist between buildings, should also be designed to be fully accessible. Furthermore, accessible public transport and secure parking for disabled people is also encouraged. The Council will also aim to ensure that developments within the borough meet the principles of lifetime neighbourhoods.

Design and Heritage

- Design is addressed by Camden in the Local Plan through Policy D1. This states that the Council seeks to secure high quality design in development. To do this, it states, the Council seeks that development:
 - Is respectful towards local context and character;
 - Preserves or enhances the historic environment and heritage assets;
 - That design and construction are sustainable and take into account best practice in resource management and climate change mitigation and adaption;
 - Is durable and adaptable;

- Is of a quality and character that is complementary to the local area;
- Integrates well with the surrounding area and open spaces, working to improve connectivity and activate street frontages;
- In inclusive and accessible;
- Promotes good health;
- Is designed to minimise crime and anti-social behaviour;
- Incorporates high-quality landscape design and maximise urban greening;
- Incorporates outdoor amenity space;
- Preserves strategic views;
- Provides a high standard of accommodation when relating to housing;
- Carefully integrates building services equipment.
- Further considerations are given to tall buildings, as it states that all of the borough of Camden is considered to be sensitive to tall buildings. Tall buildings therefore will be assessed against the above criteria and the following;
- How it relates to the surroundings, both the streetscape and the skyline;
- The historic context of the area;
- The relationship between the building and existing views;
- The overshadowing of public spaces;
- The contribution of the building to pedestrian permeability and public accessibility.
- Design is explored at length in the London Plan. Within the London Plan, Policy D2 looks at infrastructure requirements for sustainable densities. This policy states that development proposals should be considered and be mindful of the provision of future planned levels of infrastructure, instead of existing levels, and development proposals should also be proportionate to the Site's connectivity and accessibility y walking, cycling, and public transport to jobs and services.
 - Policy D3 is concerned with optimising site capacity through a design-led approach. This requires that developers must make the best use of land by following a design-led approach that optimises the capacity of a site, meaning that development is considered to be the most appropriate form and land use of the Site. This would mean that development would respond appropriately to the Site's context and capacity for growth. Following this, higher density developments would generally be more suited in locations that are well-connected to employment, services, infrastructure and amenities through sustainable means of transport (walking, cycling and public transport). Policy D3 states that development proposals should consider the following:
 - Form and Layout: enhance the local context through the delivery of buildings and spaces that positively respond to local distinctiveness through layout, orientation, scale, appearance, and shape, while considering the existing and emerging street hierarchy, building types, forms and proportions. Proposals should also encourage and facilitate active travel through a convenient, inclusive and legible landscape, with well-defined public and private environments, while facilitating efficient servicing and maintenance of buildings and the public realm.

- Experience: developments should create safe, secure and inclusive environments while providing active frontages and a strong relationship between the building uses and the public realm and delivering appropriate outlook, privacy and amenity. Furthermore, they should provide well thought out green and open space for social interaction, play, relaxation and physical activity, prevent or mitigate the effects of noise and air pollution, all while producing comfortable environments for people, both inside and out.
- Quality and Character: Developments should respond to the character of a place through identifying special features that are unique and valued, and consequently respect, enhance and utilise such heritage assets and features. Additionally, development should be of a high quality, paying attention to detail and showing consideration to the use, flexibility, safety and building's lifespan through considered construction methods and choice of materials. Finally, developments should aim for high-sustainability standards and take into account the principles of the circular economy and provide spaces and buildings that maximise urban greening and create attractive and reliant spaces.
- Policy D4 of the London Plan requires that Design and Access statements be submitted with development proposals, that demonstrate that proposals meets the design requirements of the London Plan. Additionally, good use should be made of the process of design review processes to assess and inform design at the early stages of development. Importantly, development proposals that are referable to the Mayor must have undergone at least one design review early on, or demonstrate that they have undergone a local borough process of design scrutiny, if they:
 - 1) include a residential component that exceeds 350 units per hectare; or
 - 2) propose a building defined as a tall building by the borough (see Policy D9 Tall buildings), or that is more than 30m in height where there is no local definition of a tall building.
 - If a design review is undertaken by local authority, it must comply with the following criteria:
 - 1) design reviews are carried out transparently by independent experts in relevant disciplines
 - 2) design review comments are mindful of the wider policy context and focus on interpreting policy for the specific scheme
 - 3) where a scheme is reviewed more than once, subsequent design reviews reference and build on the recommendations of previous design reviews
 - 4) design review recommendations are appropriately recorded and communicated to officers and decision-makers
 - 5) schemes show how they have considered and addressed the design review recommendations
 - 6) planning decisions demonstrate how design review has been addressed
- Inclusive design is covered by Policy D5. This states that development proposals should be of the highest quality in regard fir accessibility and inclusivity. They should meet the following criteria:
 - 1) be designed taking into account London's diverse population
 - 2) provide high-quality people-focused spaces that are designed to facilitate social interaction and inclusion
 - 3) be convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment

- 4) be able to be entered, used and exited safely, easily and with dignity for all
- 5) be designed to incorporate safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum, at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building. Housing developments are required to meet the minimum standards below which apply to all tenures and all residential accommodation that is self-contained.

Private internal space is expected to meet the following requirements:

- 1) Dwellings must provide at least the gross internal floor area and built-in storage area set out in Table 3.1.
- 2) A dwelling with two or more bedspaces must have at least one double (or twin) bedroom that is at least 2.75m wide. Every other additional double (or twin) bedroom must be at least 2.55m wide.
- 3) A one bedspace single bedroom must have a floor area of at least 7.5 sq.m. and be at least 2.15m wide.
- 4) A two bedspace double (or twin) bedroom must have a floor area of at least 11.5 sq.m..
- 5) Any area with a headroom of less than 1.5m is not counted within the Gross Internal Area unless used solely for storage (If the area under the stairs is to be used for storage, assume a general floor area of 1 sq.m. within the Gross Internal Area).
- 6) Any other area that is used solely for storage and has a headroom of 0.9- 1.5m (such as under eaves) can only be counted up to 50 per cent of its floor area, and any area lower than 0.9m is not counted at all.
- 7) A built-in wardrobe counts towards the Gross Internal Area and bedroom floor area requirements, but should not reduce the effective width of the room below the minimum widths set out above. Any built-in area in excess of 0.72 sq.m. in a double bedroom and 0.36 sq.m. in a single bedroom counts towards the built-in storage requirement.
- 8) The minimum floor to ceiling height must be 2.5m for at least 75 per cent of the Gross Internal Area of each dwelling.

For private outside space, the following requirements apply:

- 1) Where there are no higher local standards in the borough Development Plan Documents, a minimum of 5 sq.m. of private outdoor space should be provided for 1-2 person dwellings and an extra 1 sq.m. should be provided for each additional occupant, and it must achieve a minimum depth and width of 1.5m. This does not count towards the minimum Gross Internal Area space standards required in Table 3.1
- The provision of accessible housing is covered by the following policy, Policy D7 states that in order to provide suitable housing and choice for everyone, including disabled people, older people, and families with young children, residential developments should ensure that, at a minimum, 10% of all dwellings are wheelchair user dwellings and all other dwellings must meet building regulation requirement M4(2) and be accessible and adaptable dwellings.
- Policy D6 of the London Plan looks at housing quality and standards. Housing developments should be a high-quality design and provide adequately sized rooms with functional layouts that do not differentiate between tenures. Dual aspect dwellings are preferred over single-aspect, and single

aspect dwellings will have to be justified and demonstrated that it is the preferred design option, while providing adequate passive ventilation, daylight, and privacy and avoiding overheating. Furthermore, the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate while avoiding overheating, minimising overshadowing, and maximising the usability of outside amenity space. The design of the housing is required to incorporate functional storage space that facilitates the collection of dry recyclables and food waste, as well as residual waste.

- Policy D9 addresses tall buildings, stating that development proposals should address visual impacts, spatial hierarchy and context, architectural quality and materials, heritage assets in the vicinity, functional impact, environmental impact, and cumulative impacts.
- Policy GG2 of the London Plan states that successful and sustainable mixed-use places should apply a design-led approach to determine the optimum development capacity of sites. Furthering this, Policy GG4 of the London Plan states that developments should produce good quality homes that meet high standards of design and meet identified needs, including specialist housing. Heritage
 - Camden's Local Plan addresses heritage in Policy D2. This policy states that Camden will not permit the loss of or substantial harm to a designated heritage asset, this includes conservation areas and listed buildings, unless that harm or loss is necessary to achieve public benefits that outweigh harm and loss. Speaking specifically about conservation areas, this policy states that in order to preserve the nature of a conservation area, the Council will take into account Conservation Area Statements, appraisals and management strategies. The policy goes on to state that they will resist development that, despite being outside a conservation area, causes harm to the character or appearance of a conservation area. Furthermore, in regard to listing buildings, this policy states that the Council will resist development that could cause harm to a listed building through an effect of its setting.

Priory Terrace Conservation Area

The Priory Road Conservation Area Appraisal states that the area has a cohesive architectural quality that has changed very little over the last 150 years. The area was built over a 20-year period, with few buildings added since. It can be seen as a distinct example of the Italianate fashion of the mid-19th Century.

The style is characterised by a wide variety of detail and this gave the opportunity for either elaborate or little decoration. The dominant building is semi-detached villas with three storeys and a basement.

The Abbey Road Area is wide and bussling, and accommodates a bus route. As the road curves towards Priory Road, it is dominated by the Church of St Mary, a gothic style Grade II listed church with a Church Hall. The majority of properties along Abbey Road are stuccoed semi-detached villas. These are set back below low brick walls. Overall, there is uniformity in style and scale. There are a few interruptions from this Victorian typology, namely the Sylvan Court (built in the 1960s) and the lock-up garages on this site.

Priory Terrace is a straight road that links to Abbey Road, with terraced housing that generally have less decoration than the rest of the conservation area but they do have distinct features: adjacent raised front doors with double-width steps with decorative ironwork railings; doors with arched glazing; and ground floor projecting bays. The Priory Terrace Area Appraisal states that the overarching impression is a unified residential area, that is home to a pattern and form that continues to dominate, despite some changes. These dominant features include: front area

boundary walls that create a formal relationship between the house and the street; and informal greenery.

- The most significant views are as follows:
 - Towards the Church;
 - Towards Abbot's lace from Abbey Road/West End Lane; Kilburn Priory to Priory Road ad Priory Terrace:
 - Along Priory Road and Priory Terrace; and
 - Along Belsize Road at the shops.

Additionally, since there are a considerable number of semi-detached buildings, the consequent gaps provide views into back gardens, of mature trees and through to the rear of properties.

South Hampstead Conservation Area Character Appraisal and Management Strategy February 2011

The South Hampstead Conservation Area Appraisal and Management Strategy states that the area is a notable example of a leafy Victorian suburb. It is mainly residential in nature, and is largely homogenous in scale and character. It is characteristics by large semi-detached and terraced late-Victorian properties. These are mainly in red or gault (white/cream) brick. The roofscape, (turrets, gables and tall chimneys) are particularly distinctive.

Vegetation is one of the most prominent features of the area, and is present both in front and rear gardens of properties. Green front gardens, with low or ornate garden walls, often topped with hedges dominant in this area. In turn, the building line of the residential streets are generally set back from the pavement. Combined with the variety of mature trees, these features create a distinctive and serene streetscape. Both the open green private gardens and the communal gardens are important features and remain undeveloped. These green areas provide valuable wildlife corridors, a diverse portfolio of biodiversity and work in reducing floor risk.

The most significant views are as follows:

- Looking down Priory Road towards St Mary's Church; and
- The variety of green views into verdant back gardens and into the four private open spaces.

The Alexandra Road Conservation Area Statement

- Alexandra Road Conservation Area is largely informed by the fact that it is was developed by one landowner, the Council, over a short period in the 1970s, therefore it is very homogenous in character. The character of the estate can be defined is modernist and brutalist in nature. It is predominantly a residential area, with open and green spaces.
- The estate has a prominent geometric quality, orthogonal arrangements being varied by the use of bold chamfers. Changes in levels are used playfully, and the landscape forms an integral part of the scheme. The area of green public space that sweeps east/west is intersected diagonally to create a structural series of outdoor rooms. Tree and shrug planting is also used to create structural spaces
- Significant views within the conservation area are as follows:

- Views along the principal axis of the estate, particularly along Rowley Way;
- Around Tenants Hall on the site there are good views; and
- Approaching the estate via Langtry Way, there is a series of vistas visible to the pedestrian. Policy HC1 of the London Plan states that development proposals that could affect heritage sites and their proposals should be significant to the asset and the appreciation of the asset within the surrounding area. It is also important for the cumulative impacts of incremental changes from development is managed. Therefore, development proposals should avoid harm and identify enhancement opportunities by assessing heritage considerations at an early stage in the development process. Development proposals are also expected to identify assets of archaeological significance and minimise harm, while protecting the Sites.

Sustainability

- Camden has committed that all developments must minimise the effects of climate change and encourage all developments to meet the highest feasible standards that are possible within the financial constraints, during construction and occupation. Policy CC1 of the Local Plan addresses this, they state that they will
 - Promote zero-carbon development and require all development to reduce carbon dioxide emissions through following the steps in the hierarchy;
 - Require that major developments show how they are meeting London Plan targets for carbon dioxide emissions;
 - Ensure that the location of the development and the mix of land uses supports a move away from car-dominance;
 - Encourages changes to buildings to make them more energy efficient;
 - Require that proposals which include significant demolition are able to justify that it is not possible to retain and improve the existing building; and
 - Expect all developments to optimise resource efficiency.
- Further to this, Policy CC2 outlines how developments should adopt climate change adaptation measures as appropriate. Policy CC2 states that these measures would see the protection of existing green space and the promotion of green infrastructure, wherever possible, the reduction of surface water runoff through permeable surfaces and the use of SuDS, in addition, biodiverse roofs, green and blue roofs and green walls can be incorporated where appropriate and finally, measures that reduce the impact of urban and dwelling overeating (this includes the application of the cooling hierarchy). The information should be communicated in the form of a Sustainability Statement for any development that involves 5 or more residential units or over 500sqm floor space.
- Policy D3 links design and sustainability, it states that developments should consider form and layout; experience; quality and character and through doing so should create a development that is sustainable and resilient. This will be delivered by aiming for high sustainability credentials and taking into account the circular economy, as well by providing spaces and buildings that maximise the available opportunities for urban greening. This will ensure that developments are resilient and attractive places that are capable of managing surface water run-off. The Council also promotes sustainability through the design and construction phase. This will be implemented through the Council ensuring that developments demonstrate the adaption measures in place and how they

have been incorporated into the design and proposed implementation, encouraging new build residential developments to use the Home Quality Mark or Passivhaus design standards, encourage conversations and extensions of 500sqm or above to achieve 'excellent' in BREEAM domestic refurbishment, and expect non-domestic developments of 500sqm or more of floor space to achieve 'excellent' in BREEAM assessments.

- Policy S1 2 of the London Plan states that all major developments should be net zero-carbon. In order to do this, energy demand should be reduced in accordance with the following energy hierarchy:
 - 1) be lean: use less energy and manage demand during operation
 - 2) be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly
 - 3) be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site
 - 4) be seen: monitor, verify and report on energy performance.

Major developments are also expected to provide a a detailed energy strategy to demonstrate how the development accords with the above. Again, for major developments, a minimum on-site reduction of at least 35% beyond Building Regulations is expected, with residential developments expected to achieve 10% and non-residential developments 15% through energy efficiency measures. Where it is proven that this is not possible, an agreement can be reached between the developer and the borough and either a cash-in-lieu payment can be arranged towards the carbon offset fund, of off-site provision can be delivered. In order to achieve this in practice, borough must establish a carbon offset fund, this fund must be ring-fenced to deliver carbon reductions and the details of this fund should be monitored and reported on annually. Additionally, major developments should calculate and minimise carbon emissions from any other part of the development that is not covered by building regulations. Finally, proposals that are referable to the Mayor should produce a whole-life cycle carbon emissions report and evidence how actions have been taken to reduce life-cycle carbon emissions.

- Policy SI 4 addresses how proposals should minimise adverse impacts on the urban heat island through design, layout, orientation, materials and through the implementation f green infrastructure. This policy requires that major developments produce an energy strategy that lays out how the development will reduce the potential for internal overheating and the reliance on air conditioning systems. This should be done in accordance with the following hierarchy:
 - 1) reduce the amount of heat entering a building through orientation, shading, high albedo materials, fenestration, insulation, and the provision of green infrastructure;
 - 2) minimise internal heat generation through energy-efficient design;
 - manage the heat within the building through exposed internal thermal mass and high ceilings;
 - 4) provide passive ventilation;
 - 5) provide mechanical ventilation;
 - 6) provide active cooling systems.
- Policy SI 7 of the London Plan addresses the reduction of waste and outlines how developments can evidence their support for the circular economy. This policy states that the London Plan aims to

promote a more circular economy and improve resources efficiency and innovation. Therefore, waste minimisation and waste prevention are encouraged through the reuse of materials, and the plan aims to meet the reduction targets of 95% reuse/recycling/recovery for waste and material streams for the construction and demolition that takes place within the borough. Development design should also incorporate adequate, flexible, and easily accessible storage space and collection systems to allow for the separation and collection of household recyclable goods. For applications that are referable to the Mayor, they are expected to produce a Circular Economy Statement that demonstrates:

- 1) how all materials arising from demolition and remediation works will be re-used and/or recycled
- 2) how the proposal's design and construction will reduce material demands and enable building materials, components, and products to be disassembled and re-used at the end of their useful life
- 3) opportunities for managing as much waste as possible on site
- 4) adequate and easily accessible storage space and collection systems to support recycling and re-use
- 5) how much waste the proposal is expected to generate, and how and where the waste will be managed in accordance with the waste hierarchy
- 6) how performance will be monitored and reported.
- Sustainable drainage is covered in Policy SI 13. This states that development proposals should aim to achieve greenfield run-off rates and ensure the management of surface run-off, as close as is possible to the source. Preference is also given to green over grey features, and this guidance should be followed in line with the following drainage hierarchy:
 - 1) rainwater use as a resource (for example rainwater harvesting, blue roofs for irrigation)
 - 2) rainwater infiltration to ground or close to the source
 - 3) rainwater attenuation in green infrastructure features for gradual release (for example green roofs, rain gardens)
 - 4) rainwater discharge direct to a watercourse (unless not appropriate)
 - 5) controlled rainwater discharge to a surface water sewer or drain
 - 6) controlled rainwater discharge to a combined sewer.

Impermeable surfaces should be avoided where they can be and drainage is required to be designed and implemented in ways that promote multiple benefits. This could include increased water use efficiency, improved water quality, enhanced biodiversity, urban greening, amenity, and recreation.

At the core of the NPPF is the presumption in favour of sustainable development, sustainable
development is a development that meets economic, social, and environmental objectives in a
mutually supportive way.

Water and Flooding

- Water and Flooding are addressed by Policy CC3 of the Local Plan. Camden aims to ensure that any new developments do not increase the flood risk, and where possible, reduce the risk of flooding. Therefore, they will require that development:
 - Incorporate water efficiency measures,
 - Avoid hard to the water environment and improve water quality; consider flooding and the risk
 of its impact from a development;
 - Include floor resilient measures in areas that are prone to flooding;
 - Utilise SuDS in line with the drainage hierarchy to achieve run-off where possible; and
 - Avoid the location of vulnerable development in flood-prone areas.
- Within the London Plan, Policy SI 5 looks at water infrastructure. This policy states that development proposals should, through planning conditions, minimise the use of mains water in line with the Optional Requirement of the Building Regulations (residential development), achieving mains water consumption of 105 litres or less per head per day (excluding allowance of up to five litres for external water consumption). They should also achieve an excellent rating from BREEAM for the 'Wat 01' water category160 or equivalent (commercial development), and additionally, include the likes of smart meters, water-saving and recycling practices to help achieve lower water consumption rates and to maximise future-proofing. Furthermore, the policy requires that development proposals plan to improve the water environment and ensure that adequate wastewater infrastructure is present while being proactive in minimizing the potential for misconnections between foul and surface water connections.
- Policy SI 12 states that development proposals should ensure that flood risk is minimized and mitigated and that residual risk is addressed. This should include, wherever possible, making space f water and aiming for development to be set back from the banks of the watercourses.
 Development proposals should also take into account the measures that are set out in the Thames Estuary 2100 Plan.
- The NPPF states in paragraph 154 that new developments should avoid vulnerable areas to flooding, and mitigate appropriately where necessary

Air Quality

- The Council aims to reduce the impact of development on air quality and ensure that any impact is mitigated to ensure that exposure to poor air quality is reduced across the Borough as a whole. This is addressed in Policy CC4 of the Local Plan. Therefore, given this, the Council will consider the impact that a development will have on air quality, looking at the exposure of occupants to air pollution and the impact of the development on air quality. The Councils Air Quality Action Plan will be considered. Where it is considered that a development will expose residents to high levels of pollution an Air Quality Assessment will be required alongside an application. Where a development includes considerable demolition, construction, or earthworks, it will be expected that a Construction Management Plan will be submitted. This will assess the risk of dust and emissions and include appropriate mitigation measures.
- Policy SI 1 states that in order to protect and improve the health of Londoners, tackle poor air
 quality, and meet legal obligations, development proposals should not lead to worsening of air
 quality, create new areas that exceed air quality limits, or create an unacceptable risk of high levels

of exposure to poor air quality. Therefore to meet Part 1 as a minimum, developments should be, at least, air quality neutral, proposals should utilise design solutions to mitigate exposure to air pollution, and make provisions to address local problems of air quality. Major developments must be accompanied by a Air Quality Assessment showing how the development will meet the requirements of B1. Development should also be avoided in Air Quality Focus Areas, and if development is in one of these areas, or is likely to be used by a large number of vulnerable people, then, the demonstration should be provided of how the risks are mitigated. In order to reduce the impact of air quality during demolition and construction, evidence should be provided of how they plan to comply with the Non-Road Mobile Machinery Low Emission Zone and reduce emissions from the demolition and construction of buildings following best practice guidance.

Waste

Policy CC5 of the Camden Local Plan addresses how the Council seek to become a low waste borough. This
policy states that developments include facilities for the storage and collection of waste.

Digital Connectivity Infrastructure

- Policy S1 6 of the London Plan addresses how London will maintain its global competitiveness. To do this, it requires that developments proposals address the following points:
 - Ensure that there is the provision of sufficient ducting space for full fibre connectivity infrastructure to all end users within new developments, unless an affordable alternative IGB/scapable connection is made available to all end users
 - Meet expected demand for mobile connectivity generated by the development
 - Take appropriate measures to avoid reducing mobile connectivity in surrounding areas; where that is not possible, any potential reduction would require mitigation
 - Support the effective use of rooftops and the public realm (such as street furniture and bins) to accommodate well-designed and suitably located mobile digital infrastructure.

Fire Safety

Policy GG6 of the London Plan states that to help London become more resilient and efficient, planning decisions must ensure that a safe and secure environment is provided that is resilient to the impact of emergencies, including fire.

Fire is again discussed in Policy D5. This states that developments should be designed to incorporate safe and dignified emergency evacuation for all buildings users. In all developments where lifts are installed, a minimum of at least one lift per core (or subject to capacity assessments) should be a suitably sized fire evacuation lift that would be suitable for evacuating people. The fire evacuation lifts and associated provisions should be appropriately designed, constructed and managed. In addition, within a Design and Access statement, there should be clear instructions of how access will be maintained and managed within the development, this includes fire evacuation procedures.

Policy D11 Safety, Security and Resilience to Emergency, reiterates the point tat all development should de resilient against measures including fire, and that development proposals should maximise building resilience and minimize potential physical risks, including those that come from

fire. It goes on to state that London Fire Commissioner should e consulted early in the design process, to ensure issues are addressed early in the process.

Policy D12 Fire Safety states that all proposals must achieve the highest standards of fire safety and ensure that they:

- 1) identify suitably positioned unobstructed outside space:
- a) for fire appliances to be positioned on
- b) appropriate for use as an evacuation assembly point;
- 2) are designed to incorporate appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire; including appropriate fire alarm systems and passive and active fire safety measures;
- 3) are constructed in an appropriate way to minimise the risk of fire spread;
- 4) provide suitable and convenient means of escape, and associated evacuation strategy for all building users; and
- 5) develop a robust strategy for evacuation which can be periodically updated and published, and which all building users can have confidence in.

In addition, all major developments should submit a Fire Statement. This is an independent fire strategy that is produced by a third party, preferably a qualified assessor. This statement should include:

- 1) the building's construction: methods, products and materials used, including manufacturers' details:
- 2) the means of escape for all building users: suitably designed stair cores, escape for building users who are disabled or require level access, and associated evacuation strategy approach;
- 3) features which reduce the risk to life: fire alarm systems, passive and active fire safety measures and associated management and maintenance plans;
- 4) access for fire service personnel and equipment: how this will be achieved in an evacuation situation, water supplies, provision and positioning of equipment, firefighting lifts, stairs and lobbies, any fire suppression and smoke ventilation systems proposed, and the ongoing maintenance and monitoring of these;
- 5) how provision will be made within the curtilage of the site to enable fire appliances to gain access to the building; and
- 6) ensuring that any potential future modifications to the building will take into account and not compromise the base build fire safety/protection measures.

Appendix D – Report on Commercial Space

ABBEY ROAD PHASE 3

REPORT ON COMMERCIAL FLOOR SPACE IN PROPOSED REDEVELOPMENT OF THE ESTATE PHASE 3



CONTENTS

- 1. CURRENT RETAIL PROVISION
- 2. LOCATION / AREA
- 3. OTHER COMMERCIAL SPACE IN THE LOCALITY
- 4. DEMAND FOR RETAIL SPACE IN THIS LOCALITY
- 5. PROPOSED DEVELOPMENT
- 6. RECOMMENDATIONS
- 7. CONCLUSION

Appendices

Appendix A: Schedule of current tenants

Appendix B: Location Plan showing retail areas in locality Appendix C: Plan of new proposed commercial space



1. CURRENT COMMERCIAL PREMISES PROVISION

1.1 Description and Construction

The site subject of Phase 3 of the Abbey Belsize Road Development includes two residential blocks, Emminster and Hinstock, with ground floor retail uses, a Public House, a Health Centre and Community Centre. The block is of concrete construction, built circa 1965.

1.2 Shop Units

The current commercial units comprise 6 shops located beneath Hinstock and facing into the estate, plus 4 units and a Public House facing Abbey Road beneath Emminster. A rear courtyard used for deliveries and parking links the blocks at the rear of each and a Health Centre at 1st floor level.

The Schedule at Appendix A gives details of the areas for each shop unit and the public housewith a total of approximately 860 m2.

1.3 Current Occupation and uses

The Schedule at Appendix A also shows details of current occupation of shop units. On Belsize Road, one unit is occupied by the Tenant Management Organisation (TMO) as an estate office. One is trading as an Indian Restaurant, (only open in the evening for take away food) one an off licence / small grocery. The former pharmacy at 214 Belsize Road was vacated approximately two years ago when the lease ended as the space did not meet their requirements; it is now used for temporary storage by builders fitting out the new TMO space. The final two units on Belsize Road are used effectively as storage by one of the traders on Abbey Road, the Party Shop. Shutters are usually kept down for security.

Of the units on Abbey Road, the Lillie Langtry Public House on the corner is let to Admiral Taverns who in turn let it to a manager. Two of the other units are let to the Party Shop and the remaining two are let to Hampstead Piano Services – sales and servicing of pianos.

As can be seen the majority of the existing businesses are trades which involve minimal direct retailing to a passing customer footfall and could likely work in a number of locations and may not even require a shop frontage.

All the existing occupiers have been in occupation for a number of years. Rents charged have not been reviewed or increased for many years since the development was proposed as there was uncertainty for the traders in how long they would be able to remain.

The existing occupiers have all been kept informed of the development proposals including invitation (and attendance by most) at public consultation events. More recently formal notices have been served (as appropriate) to terminate leases at the end of September 2022 in accordance with the Landlord & Tenant Act 1954. In addition, negotiations have taken place with the PH tenant Admiral Taverns and terms agreed to 'buy out' the remainder of their

long leasehold interest and vacate by the end of September. Vacant possession is required of all the commercial units to enable the development to proceed.

More recently meetings have been offered to the occupiers individually to explain the timetable and proposals and encourage tenants to review their business models and consider their future essential space requirements, especially in the context of being unlikely to find such affordable rents elsewhere. All tenants have also been sent emails with a link to the council's website advertising currently vacant commercial spaces to let in the Borough. If they identify any which could be suitable for them to move to, the Camden Commercial Property Management Team would obviously do what can be done to assist.

2. LOCATION / AREA

2.1 Description of area

The immediate area is predominantly residential with a large area of Local Authority housing on this estate with large Victorian street properties adjoining, many converted into flats. To the south of the site Belsize Road leads to Kilburn High Road and to the north towards Finchley Road and Swiss Cottage.

3. OTHER COMMERCIAL SPACE IN LOCALITY

Immediately across Belsize Road from the subject blocks Phase 1 of the council's development provided 3 commercial spaces on the ground floor of the new housing blocks. On the corner of Abbey Road and Belsize Road a larger unit provided under Phase 1 has been let to Sainsburys to provide a Sainsburys Local which is trading well and provides all essential items for local residents. Adjoining is a shell and core unit yet to be let. It has yet to be fully / actively marketed. The final unit in Phase 1 is to be the new office for the TMO who will move from existing offices in one of the commercial units beneath Hinstock. This unit is currently being fitted out.

The nearest alternative retail units to the subject parades are approximately 160m further south on Belsize Road where the council own a number of shop units on one side of a small parade. Traders here include a wine bar, a café, a hairdresser. Of the two empty units there is interest in both; one for a barbers and male grooming shop and one for the retail of pet products and services. The parade opposite has had an empty unit to let.

A few minutes further down Belsize Road leads to Kilburn High Road with a myriad of retail outlets with a huge range of items being sold.

East on Abbey Road there is little commercial space for some distance. Going north on Belsize Road leads to South Hampstead with a Tesco Metro and a range of other shops, mainly restaurants and specialist services and trades. Beyond is Finchley Road and Swiss Cottage with a huge range of shops.

A number of buses regularly travel up and down Belsize and Abbey Roads so residents at the subject estate can easily access a very wide range of retail shops and services.

4. DEMAND FOR RETAIL SPACE IN THIS LOCATION

4.1 Demand from traders

The current situation with only two units occupied by traders predominantly serving the local residential population, and the limited amount of actual retail trade which takes place in the occupied units, does support the contention that demand for retail space in this location is limited.

Retail patterns were already changing pre Covid with more and more online retail, but this has accelerated following the lockdowns in the last two years. The majority of interest and demand in taking space in retail parades and locations is coming from service providers and food outlets.

4.2 Demand from local residents

Local residents have been consulted widely on the proposed redevelopment and asked which shops and services they use on a regular basis. Apart from a grocery shop (which is provided by Sainsburys) local residents would like to see a pharmacy and a café.

5. PROPOSED DEVELOPMENT

The Cabinet has approved proposals to progress with Phase 3 of the development of this estate with Planning Application to be submitted in late April/early May this year. This will include the demolition of the existing residential blocks at Hinstock and Emminster, the 10 retail units, the PH, the Health Centre and the Community Centre. New premises are soon to be completed for the Health Centre and the Community Centre, on Phase 2 of the regeneration scheme.

The Phase 3 redevelopment will provide a mixed-use scheme with an increase in overall dwelling numbers and a proposed reduction in commercial floor space to approximately 305.3 m2 (GIA). It is proposed that the total commercial floor space would be provided as 3 separate smaller units located beneath two of the proposed residential blocks, fronting Abbey Road and the junction with Belsize Road. The intention is to finish the development to a high standard both to provide a positive contribution to the new Phase 3 homes and the amenity of the area.

6. **RECOMMENDATIONS**

6.1 Total commercial floor space proposed

It is proposed that the new development should include a reduced amount of retail floor space, of no more than the 305.3 m2 (GIA) proposed.

The proposed level of new commercial floor space and the arrangement and size of units is likely to be the optimum to attract new and viable businesses. Our experience is that small units are very sought after especially by independent traders and start-ups. With the changes to retail over the past few years, less space is needed for display of goods as many are sold on-line. Much demand is from specialist café or coffee shop uses which only require a space for some food prep, counter and some seating (and ideally some outside). Hair and beauty services operate with one or two 'chairs' and treatment rooms which can be accommodated in quite a small space keeping overheads manageable for the business. Smaller spaces also benefit from the Governments Small Business Rate Relief Scheme, which again assists the viability of the business.

6.2 Proposed trader(s) for new commercial spaces

Given the close proximity to the new Health Centre we would envisage that there would be interest form a pharmacy business. Other potential business tenants which might be viable in this area in new premises would be hair / beauty services and possibly a café. There could be scope for specialist retailers and destination shops not relying on direct passing trade.

6.3 Layout of proposed space

The new retail floor space will be located on the ground floor of two of the new blocks facing Abbey Road and the junction with Belsize Road, to create a focal point and 'commercial' centre at this road junction (see plan at Appendix 2). The size and shape of the 3 units designed are likely to be attractive to traders giving any retailer flexibility in terms of store layout and separation of trading space, storage and ancillary space.

7. CONCLUSION

In terms of viability, sustainability, and contribution towards the overall success of the scheme, it is essential that the retail floor space is reduced from the current uneconomic level which is in excess of demand.

The retail floor space should not exceed the 305.3 m2 (GIA) proposed as this amount of space together with the proposed configuration to 3 smaller units is most likely to attract strong sustainable businesses to take leases in this location. The retail offer to local residents would also be enhanced together with an improved appearance.

Christine Dove MRICS 31st March 2022

Appendix E - Regeneration Statement

This Regeneration Statement has been prepared by CBRE on behalf of the Applicant, London Borough of Camden, in support for an application for the following development located on Phase 3 of the Abbey Road Regeneration.

Demolition and redevelopment of Emminster and Hinstock blocks including Belsize Priory Health Centre, Abbey Community Centre, public house and commercial units to provide new residential accommodation (Use Class C3) and ground floor commercial space (Use Class E/Sui Generis) to be used as flexible commercial units, across three buildings ranging from 4 to 11 storeys, along with car and bicycle parking, landscaping and all necessary ancillary and enabling works.

This statement has been prepared in accordance with the requirements set out in the London Borough of Camden Local Area Requirements. This statement comprises the following information:

- Regeneration Strategies supporting the proposed development;
- Floor space totals for each proposed use;
- New jobs that may be created or supported by the development; and
- Intended community benefits that the proposed development will create.

Regeneration Strategy

Abbey Road Phase 3 is part of a larger regeneration programme for the Abbey Road area. Original Outline consent was approved in 2012 which established a three-phase plan where all existing buildings on site including link bridges are demolished and Phase 1 of the redevelopment comprises residential dwellings with ancillary retail, Phase 2 comprises a health and community centre and Phase 3 provides further residential accommodation with ancillary commercial space. Figure 1 below sets out the location of each of the phases

Property Name The Cricketers, 121 Abbey	Property Type Description	Leased	Debtor Name	Use	Floor Area
Road	Public House	Leased	Admiral Taverns Limited	Public House	276.74
127 Abbey Road /	Shop	Leased	Oscar Weiner t/a Oscar's Den	Party Shop	84.89
129 Abbey Road	Shop	Leased	Oscar Weiner t/a Oscar's Den	Party Shop	
131 Abbey Road /	Shop	Leased	Thomas J Walter t/as Hampstead Pia	Piano Shop	86.15
133 Abbey Road	Shop	Leased	Thomas James Walter	Piano Shop	
208 Belsize Road	Health Centre	Leased	NHS Property Services Limited (CC 7	Health Centre	
212 Belsize Road	Shop	Leased	Oscar Weiner	Party Shop (storage)	70.4
214 Belsize Road	Shop	Leased	Ms Christiana Nnenne Akpu	Off Licence / Groceries	62.6
216 Belsize Road	Shop	Vacant	Contractor Storage	Temp Storage	71.5
218 Belsize Road	Shop	Leased	Muhammed Ali	Indian Take Away	69.7
220 Belsize Road	Shop	Leased	Abbey Road Housing Co-Op Ltd	TMO Office	70
222 Belsize Road	Shop	Leased	Oscar Weiner t/a Oscar's Den	Party Shop (storage)	68
	-				859.98

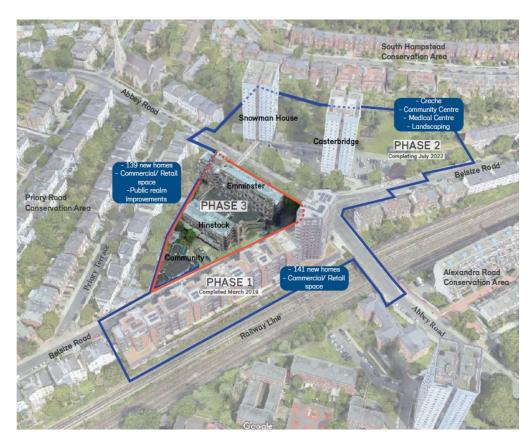


Figure 1. Source: Pollard Thomas Edwards Architects, 2022

Subsequently, a Hybrid Application was permitted in 2014. This application comprised a detailed application for Phase 1 and outline application for Phases 2 and 3. Phase 2 was proposed to be located around the base of the two residential towers, Snowman and Casterbridge and comprise up to 2,500 sqm. Phase 1 has been completed in line with this consent.

Following this, a detailed application relating to Phase 2 only was submitted in 2015 and was subsequently withdrawn in 2019. This application set out that the health and community centre would be split into separate buildings, with the community centre located on the west of the site and health centre located on the east. Following extensive consultation with the NHS user groups in relation to the use of the health centre and with residents and the local community in relation to the use of the Community Centre, it was decided that changes were required, and that the two uses should be co-located. This accounted for the requirements of a smaller community centre, more open space, a more efficient management system, and drainage issues to be resolved. As such, a new design team was appointed and Phase 2 was granted planning permission On 27th November 2020 (reference: 2020/2486/P). Upon completion, the open space surrounding these residential towers will provide a relocated health and community centre, a relocated residential car park, cycle parking, the demolition of the link bridge between Phase 2 and 3, and associated access and landscaping works. Phase 2 should be completed by summer 2022.

Proposed Uses

The proposed development for Phase 3 includes the demolition of the existing residential buildings, public house, health centre and community centre and retail units, and the redevelopment of the site. The health and community centre have been re-provided through Phase 2, which will be completed in summer 2022. The Phase 3 proposals comprise three residential buildings ranging in height from four to eleven storeys, with the height stepping up towards the junction of Abbey and Belsize Road, with ancillary flexible commercial floorspace at ground floor and a

private communal garden to the rear which will include children's play space. The development is proposed to be car-free, with the exception of wheelchair accessible parking which will be accommodated adjacent to the site.

The proposed floor areas are as follows:

The total proposed floor area is 13,176.3 sqm (GIA). A floorspace schedule is provided below.

DESCRIPTION	USE CLASS	SQM (GIA)
Residential units	C3	12,871
Flexible commercial floorspace	Sui Generis/Class E	305.3

Employment

The proposed development will provide employment opportunities during both the construction phase and post completion. This statement should be read in conjunction with the Employment and Training Strategy prepared by Volterra, and submitted as part of this application.

During Construction

The Applicant has developed targets for the proposed development in partnership with LBC. Many of the targets will provide a range of opportunities from across the industry, from white-collar to trade roles.

The table below describes the primary social impact project deliverables. These figures have been calculated using the CITB client based client-based approach benchmarks – Band 7 based on the build cost of £36M.

Wates will work with their supply chain and aim to provide as a minimum 65 Full Time Equivalent (FTE) roles for individuals living in Camden. This accounts for 18 new jobs created, 14 new apprenticeships created and 33 existing roles.

ACTIVITY	OUTPUT TARGETS	
Work experience	20	
New jobs created (Camden residents)	18	
Total FTE employment (Camden residents.)	65	
CIAG	9	
Pre-employment / traineeships training	2 – 20 people	
New apprentices (Camden residents)	14 (731 weeks)	
Qualifying the workforce / upskilling	32	
Spend with local suppliers (Camden) (£)	(20%) £7,200,000	
Spend with social enterprise	£50,000	

Meet the buyer events for Camden business and surrounding boroughs	2	
Business training/support events (no.)	2	

More detail on the specific targets, objectives and the delivery plan is provided within the Employment and Training Strategy.

Operational Phase

The operational phase will include a total commercial area of 305.3 sqm (GIA) across three units. The proposed uses are expected to be potential uses are café, retail or pharmacy.

The Employment Densities Guide advises a mid-point employment density of one full time equivalent (FTE) job supported for every 17.5 sqm (NIA) for café and retail uses. Whilst the guide does not provide recommendations for a pharmacy, a pharmacy is expected to support a similar level of employment as a typical retail store, as a high street pharmacy functions in a similar way. The same employment density is therefore applied.

The commercial floorspace at the proposed development is converted to 244 sqm NIA by using the standard NIA:GIA ratio of 0.8. Applying the employment density, it is estimated that 14 FTEs would be supported by the new commercial floorspace. Taking part time workers into account,3 this equates to 17 jobs.

The existing site consists of 835 sqm (GIA) of commercial units, supporting approximately 60 jobs in mainly retail and food and beverage uses (Appendix A). These jobs will be lost as a result of the scheme, meaning that the proposed development represents a net decrease of approximately 40 to 45 commercial jobs. However, as demonstrated elsewhere in the submission, the current commercial units are underutilised.

More detail on this can be found within the Employment and Training Strategy.

Community Benefits

The proposals will offer a number of community benefits. Firstly, the Proposed Development will provide a mixture of market and affordable housing as well as a mixture of unit sizes, appropriate for the needs of the borough.

Secondly, the Proposed Development will provide flexible commercial floorspace, to cater for the needs of local residents. There are two units proposed, one of which is capable of subdivision, comprising a total of 305.3 sqm (GIA) of flexible Sui Generis/Class E floorspace.

Thirdly, the Proposed Development, to align with the Local Plan (Policies T1 and T2) and The London Plan (Policies D7 and T2), will promote sustainable transport. This will occur through the prioritisation of walking, cycling and public transport, and subsequently, the development will be a car-free. In line with Policy T2 of the Local Plan, on-site parking will be limited to blue-badge spaces, with the provision of a policy-compliant 3% active provision of such badges. The Site has a PTAL rating of 6A (this is the second highest rating, with 6b being the highest rating). Therefore, the Site is considered to be in a good position to limit car-dependency and promote the use of sustainable modes of transport. Furthermore, Cycle parking will be provided in accordance with the standards set out in the London Plan (2021) Table 10.2 as part of Policy T5 and London Cycling Design Standards (LCDS, September 2016). It is proposed that all blocks will provide cycle parking spaces, in convenient locations on the ground floor of the buildings.

The site is part of a wider story of estate renewal, Phase 3 of 3. The three sites are distinct in their respective 'offers' in terms of open space, street activation and play but what they share is the connective relationship through the road junction. The junction is the subject of a significant improvement by LB Camden that will improve the pedestrian experience through increased footway widths and new diagonal crossing arrangements across the

junction. Thus, the completion of this estate renewal through Phase 3, will see considerable community benefits through an improved public realm, cohesive strategy, and improved provisions of services, such as high-quality housing, commercial units, and improved public realm.

Conclusion

In conclusion, the reprovision of housing on this site through three blocks of mixed-tenure housing, with the provision of commercial units that work to activate the junction at Abbey Road and Belsize Road, and a high-quality and secure shared garden for residents, will complete the three-phase estate regeneration of the Abbey Road Area, providing numerous community benefits.



Thank you

For more information

Sinéad McNestry

Planner 0044 (0)7585 138792 Sinead.mcnestry@cbre.com

Helen Nally

Associate Director 0044 (0)7880 376259 Helen.nally@cbre.com

CBRE ©2022 All Rights Reserved. All information included in this proposal pertaining to CBRE—including but not limited to its operations, employees, technology and clients—are proprietary and confidential, and are supplied with the understanding that they will be held in confidence and not disclosed to third parties without the prior written consent of CBRE. This letter/proposal is intended solely as a preliminary expression of general intentions and is to be used for discussion purposes only. The parties intend that neither shall have any contractual obligations to the other with respect to the matters referred herein unless and until a definitive agreement has been fully executed and delivered by the parties. The parties agree that this letter/proposal is not intended to create any agreement or obligation by either party to negotiate a definitive lease/purchase and sale agreement and imposes no duty whatsoever on either party to continue negotiations, including without limitation any obligation to negotiate in good faith or in any way other than at arm's length. Prior to delivery of a definitive executed agreement, and without any liability to the other party, either party may (1) propose different terms from those summarized herein, (2) enter into negotiations with other parties and/or (3) unilaterally terminate all negotiations with the other party hereto. CBRE and the CBRE logo are service marks of CBRE, Inc. and/or its affiliated or related companies in the United States and other countries. All other marks displayed on this document are the property of their respective owners.