

30 August 2022

Abbey Road Phase 3, Abbey Road, London

Local Planning Authority: Camden
Local Planning Authority reference: 2022/2542/P

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

Demolition and redevelopment of Emminster and Hinstock blocks including Belsize Priory Health Centre, Abbey Community Centre, public house and commercial units to provide 139 new residential units (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.

The applicant

The applicant is **LB Camden/ Wates**, the architect is **Pollard Thomas Edwards**

Strategic issues summary

Land Use Principles: The redevelopment of part of the estate for residential and employment floor space along with new public realm is supported. Overall, and subject to Council securing floorspace and suitable rent levels, the estate renewal meets with the requirements of the London Plan and the GPGER.

Housing: The proposal will increase housing within the estate including additional social rent and affordable units which is strongly supported. The Financial Viability Assessment is currently being scrutinised by the GLA's viability team with a view to ensuring that the proposals deliver the maximum amount of additional affordable housing. Early and late stage reviews should be secured.

Urban Design and Heritage: The scheme raises no strategic concerns with regards to layout, scale, appearance and accessibility and the new improved public realm with substantial playspace is welcome. The scheme will not harm any nearby heritage assets.

Transport: The proposals are broadly in line with London Plan transport policies, but an increase in active electric vehicle charging points is recommended, and clarifications on the design and location of cycle parking are required. The proposal to relocate a bus stop to accommodate a servicing layby is not supported and should be revised.

Sustainability and Environment: The scheme will meet with urban greening and biodiversity requirements. Further information on energy, WLC and circular economy is required, and mitigation measures on flood risk and air quality should be secured by condition.

Recommendation

That Camden be advised that the application does not yet comply with the London Plan for the reasons set out in paragraph 119. Possible remedies set out in this report could address these deficiencies.

Context

1. On 21 July 2022 the Mayor of London received documents from Camden Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.
2. The application is referable under the following Category/categories of the Schedule to the Order 2008:
 - *1Cc The building is more than 30 metres high and is outside the City of London*
3. Once Camden Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; or, allow Camden Council to determine it itself.
4. The Mayor of London's statement on this case will be made available on the GLA's public register: <https://planning.london.gov.uk/pr/s/>

Site description

5. The site is located at the junction of Abbey Road and Belsize Road and forms part of an existing estate that has undergone renewal over a number of years. The section of the estate that is the subject of this application is known as Phase 3 and consists of a building containing a health care centre, public house and retail units at ground level with 55 one bedroom units and 19 studio social rent units on the upper levels. The site also includes a standalone community centre building. The health care centre and community centre are currently being used, however with the exception of guardians occupying a few units, the residential units are vacant. Residents have been relocated to units within phase one or elsewhere in the borough.
6. In terms of heritage, the Priory Road Conservation Area (PRCA) is immediately to the west of the site and the South Hampstead Conservation Area (SHCA) a short distance to the north. The Alexandra Road Conservation Area is located a short distance to the south-east of the site on the opposite side of the rail line with the St John's Wood Conservation Area located approximately 300 metres further to the south. The nearest heritage listed buildings are the Grade II Church of St Mary and Hall located approximately 100 metres to the north. The Grade II* Alexandra Road Estate and Alexandra Road Park are located approximately 100 metres to the south of the site on the opposite side of the rail line. The nearest section of the Transport for London Road Network (TLRN) is 800m east of the site on Finchley Road. The nearest part of the Strategic Road Network (SRN) is 400m west on Kilburn High Road. The site has a public

transport access level (PTAL) of 6a on a scale of 0 to 6b, where 6b is the highest. The closest train station is Kilburn High Road 445m west of the site and Kilburn Park on the Bakerloo line is the closest London Underground station. Bus stop Belsize Road/Abbey Road is served by routes 189, 31 and 139.

Details of this proposal

7. The applicant has described the proposal as the 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.
8. The total proposed floor area is 13,176.3sq.m consisting of 12,871sq.m of residential floorspace and 305.3sq.m of commercial floorspace.

Case history

9. Detailed planning permission was granted in 2014 for the first phase of the redevelopment of the estate, which has been completed. Outline permission was also granted in 2014 for Phases 2 and 3 which established the principle of the estate-wide redevelopment, however reserved matters applications for these sites were not progressed.
10. Phase 1 was for 141 residential units including up to 66 affordable units (all social rent) in a 14 storey tower and 6 storey block, retail and Commercial floorspace and associated parking, plant and servicing. This phase was on land occupied by a multi-storey carpark located to the south of the application site.
11. A standalone full planning application was granted in November 2020 for area known as Phase 2 and this phase is currently under construction and includes open space/communal area improvements, relocation and reduction in residential parking and new community and health centre.
12. In February 2022, a pre-application meeting was held with GLA officers to discuss the current scheme on the Phase 3 site, and an advice note was issued. The note concluded that the principle of the proposed estate regeneration was 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 advice note also stated that 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 initial layout and design concepts raise no strategic concerns. Comments regarding transport, sustainable development and environmental issues were also raised.

Strategic planning issues and relevant policies and guidance

13. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the Camden Local Plan (2017) and the London Plan 2021.
14. The following are also relevant material considerations:
 - The National Planning Policy Framework and National Planning Practice Guidance;
 - The Affordable Housing and Viability SPG
 - The Good Practice Guide to Estate Regeneration
15. The relevant issues, corresponding strategic policies and guidance (supplementary planning guidance (SPG) and London Plan guidance (LPG)), are as follows:
 - Good Growth - London Plan;
 - Housing - London Plan; Housing SPG; the Mayor's Housing Strategy; Play and Informal Recreation SPG; Character and Context SPG; Good Quality Homes for All Londoners draft LPG;
 - Affordable housing - London Plan; Housing SPG; Affordable Housing and Viability SPG; the Mayor's Housing Strategy;
 - Reprovision of housing - London Plan; Housing SPG; the Mayor's Housing Strategy; Play and Informal Recreation SPG; Character and Context SPG; Affordable Housing and Viability SPG;
 - Retail / Office - London Plan;
 - Health facilities - London Plan; Social Infrastructure SPG; the Mayor's Health Inequalities Strategy;
 - Urban design - London Plan; Character and Context SPG; Public London Charter LPG; Housing SPG; Play and Informal Recreation SPG; Good Quality Homes for All Londoners draft LPG
 - Heritage - London Plan; World Heritage Sites SPG;
 - Inclusive access - London Plan; Accessible London: achieving an inclusive environment SPG; Public London Charter LPG
 - Sustainable development - London Plan; Circular Economy Statements draft LPG; Whole-life Carbon Assessments draft LPG; 'Be Seen' Energy Monitoring Guidance draft LPG; Mayor's Environment Strategy;

- Air quality - London Plan; the Mayor's Environment Strategy; Control of dust and emissions during construction and demolition SPG;
- Transport and parking - London Plan; the Mayor's Transport Strategy;
- Equality - London Plan; the Mayor's Strategy for Equality, Diversity and Inclusion; Planning for Equality and Diversity in London SPG;
- On 24 May 2021 a Written Ministerial Statement (WMS) was published in relation to First Homes. To the extent that it is relevant to this particular application, the WMS has been taken into account by the Mayor as a material consideration when considering this report and the officer's recommendation. Further information on the WMS and guidance in relation to how the GLA expect local planning authorities to take the WMS into account in decision making can be found [here](#). (Link to practice note)

Land use principles

Estate regeneration

16. In line with Policy H8 of the London Plan and the Mayor's Good Practice Guide to Estate Regeneration (GGER Feb 2018), before considering the demolition and replacement of affordable homes as part of an estate regeneration scheme, boroughs should first consider alternative options which are more cost effective and have a lesser impact on residents and the environment. The applicant has outlined that due to the condition and nature of the residential building on the site, it was not financially viable to refurbish the existing building in order to provide a more suitable unit mix. It is also accepted that in this case, the rationale for demolition and rebuild was approved as part of the consented outline application, and that existing occupiers have already moved away from the Phase 3 site. In this instance, the principles of the proposed development are accepted.
17. Where the demolition and redevelopment of an estate is supported, Policy H8 of the London Plan requires the like-for-like re-provision of affordable housing floorspace, at equivalent rent levels and at equivalent or better standard. Estate regeneration plans should also aim to increase the net provision of affordable housing, particularly homes at social rent levels. The GGER also includes this requirement, along with a number of others, which are discussed below in the context of this scheme.

Like for like replacement

18. In this regard, it is understood that the proposal includes the demolition of 3,793sq.m of residential floorspace or 74 homes, consisting of 55 one bed and 19 studio social rent units. This floorspace will be replaced with 3,906sqm of new social rent floorspace consisting of 36 one, two and three bedroom units. In addition, the scheme also includes ten Camden living units (754sq.m) and 93 (8,211sq.m) private sale units.

19. Whilst Phase 3 in itself does not deliver the social rent re-provision requirement in terms of units and habitable rooms, it must be noted that 66 social rent units were also delivered as part of Phase 1 and these units represented pure additionality (with no existing units demolished). These units can therefore be included in any calculation of replacement floorspace on the site. GLA officers accept that the quantum of social rented floorspace delivered within Phase 1, along with that proposed in Phase 3 will result in the re-provision of social rented floorspace as well as a small uplift, in line with the requirements of Policy H8 of the London Plan.
20. In line with Policy H8 and the GPGER, the existing affordable floorspace must be replaced at an equivalent or better quality, at the same or similar rent levels. For the avoidance of doubt, the existing affordable housing floorspace includes both occupied and vacant floorspace, regardless of the current condition of the stock.
21. The proposed wider estate regeneration would result in a net increase in the affordable floorspace. This will consist of 102 social rent units (including the 66 units delivered in Phase 1) and ten Camden Living units which replace the 74 social rents that currently existed on the site.

Maximising additional genuinely affordable housing

22. As set out in the GPGER, in addition to ensuring no net loss of affordable homes, estate regeneration schemes must provide as much additional affordable housing as possible. To achieve this, and as set out in London Plan Policies H5 and H8 and the Mayor's Affordable Housing and Viability SPG, the planning application will be required to follow the Viability Tested Route. This is discussed in more detail in paragraphs 35- 37 below.

Full right of return for social tenants/fair deal for leaseholders and freeholders

23. The GPGER seeks to ensure that social tenants who have to move have full right to a property on the regenerated estate of a suitable size, at the same or similar level of rent and with the same security of tenure. Furthermore, the GPGER requires that leaseholders and freeholders affected by estate regeneration are treated fairly and fully compensated if their homes are to be demolished.
24. The applicant has confirmed that the existing tenants have already been relocated to either Phase 1 units or elsewhere in the borough. Notwithstanding this, the applicant also confirmed that former residents will be offered a full right of return. This is strongly supported and should be secured within any subsequent legal agreement.

Full and transparent consultation

25. The GPGER sets out the Mayor's aspirations for full and transparent consultation and meaningful ongoing involvement with estate residents throughout the regeneration process, to ensure resident support.

26. The applicant confirmed that there has been significant engagement with the existing residents since initial discussions on the estate renewal begin prior to 2012. Details of the community consultation process have been provided and satisfies the requirements of the GPGER. In this case, it is noted and accepted that the outline consent and the estate regeneration commenced before the GLA funding requirement for a ballot to take place.

Housing supply and opportunity area context

27. Policy H1 of the London Plan seeks to optimise potential housing delivery across London, particularly through higher density residential development on brownfield sites with good existing or planned access to public transport and within walking distance of stations and town centres, including through the sensitive intensification of existing residential areas.
28. 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.

Community facilities

29. The proposal would result in the loss of existing community floor space from this site including a health care centre. Although the proposed new development does not include new community facilities, such facilities have been provided within the second phase of the estate renewal which it is understood is due to be completed. As the proposal will not result in the loss of community facilities when considered in the context of the wider the consented development, GLA officers are of the view that the proposal is in line with the requirements of Policy S1 of the London Plan. Appropriate controls should be put in place to prevent the demolition of health care facilities in advance of these being reprovided and operational on the Phase 2 site.

Loss of Public house

30. The proposal includes the demolition of an existing public house. Policy HC7 of the London Plan and the local plan (Policy Cl.1) protect Public Houses if they are considered to be of heritage, economic, social or cultural value to local communities or where they contribute to wider policy objectives for town centres.
31. It is understood that the existing public house is not registered as an asset of community value with the applicant also providing information demonstrating that the public house has limited heritage, cultural or economic value. If correct, this would indicate that the currently vacant premises makes limited contribution to the wider community and its demolition would not result in any strategically significant impacts.
32. To meet with the requirements of Policy HC7 of the London Plan, the LPA must confirm that the existing public house has no obvious social or cultural significance.

Retail units

33. The proposal includes 305sq.m of retail floorspace which will replace existing retail floorspace on the site. This will consist of units centrally located near the junction of Abbey Road and Belsize Road and will cater for local retail needs such as a fishmonger, café, specialist food store and hair/nail salon. The proposed retail floorspace is small scale and is expected to primarily meet the needs of the estate community. Overall, the retail floorspace is considered appropriate for the site and does not conflict with the objectives of the London Plan town centre / employment policies.

Housing

34. The development proposes to increase the number of housing units on the site from 74 to 139 homes. This is an increase in bedspaces within this section of the estate from 74 to from 241, 82 of which will be social rent. The proposed mix is outlined below in Table 1.

35. Table 1

	Social Rent	Camden Living	Market	TOTAL
1 Bed	7	2	45	54
2 Bed	12	8	48	68
3 Bed	17			17
TOTAL	36 (135H/R)	10 (28H/R)	93 (234H/R)	139 (397H/R)

Table 1: Unit mix

Housing tenures

36. With regards to tenure, London Plan Policy H6 sets out the Mayor's preferred tenure split of at least 30% low cost rent, at least 30% intermediate products and the remaining 40% to be determined by the Council.
37. It is understood that the existing homes to be demolished are social rent, and as such these low cost rent units must be reprovided to facilitate a right to return for existing residents in accordance with Policy H8 of the London Plan. This should be secured in the S106 agreement by reference to Social Target Rent levels. Any London Affordable Rent (LAR) units (which can be provided if the units are not facilitating a right to return) should be secured by reference to the Mayor's LAR benchmark rent levels.

Affordable housing

38. As discussed above, London Plan Policies H5 and H8 and the Mayor's Affordable Housing and Viability SPG requires all estate regeneration schemes

to proceed by the Viability Tested Route, to ensure that additional affordable housing delivery (beyond the replacement of existing homes) is maximised.

39. The submitted documents indicate that the proposal would deliver 36 social rent units and ten Camden living units. These units are in addition to 66 social rent units that were delivered through the first phase of the estate renewal. As such, 112 affordable units will be delivered over all phases to replace 74 existing affordable units resulting in a net increase in affordable housing on the site.
40. The applicant's financial viability assessment is currently being scrutinised by the GLA viability team to ensure that the proposed uplift is delivering the maximum provision of affordable housing. Notwithstanding this, early and late-stage review mechanisms will also be required, which must be secured within a S106 agreement, in accordance with the formulas and approach set out in the Mayor's Affordable Housing and Viability SPG.

Housing choice

41. London Plan Policy H10 encourages a full range of housing choice. It states that boroughs should provide guidance on the size of units required to ensure affordable housing meets identified needs. The proposal includes a mix of units ranging from one bed to three bedroom units with 17 family-sized units that are all social rent units and this is welcome. The mix raises no strategic concerns, but to meet with the Policy H10 of the London Plan, the Council should confirm that they support the mix proposed.

Playspace

42. London Plan Policy S4 seeks to ensure that development proposals include suitable provision for play and recreation, and incorporate good-quality, accessible play provision for all ages, of at least 10 sq.m. per child that is not segregated by tenure.
43. The proposed unit mix is expected to yield around 66 children. To address this, the proposal includes a play strategy that provides 675sq.m of varied, multi-generational play space within this phase of the estate which exceeds London Plan requirements of approximately 658sq.m and is supported. Social gathering spaces for older children are located centrally within the courtyards and include seating, tables and informal games area.
44. The Council should by way of condition ensure that all playspace within the development is accessible to all residents and are suitable for all age groups and accords with the requirements of Policy S4 of the London Plan and is retained on the site for the benefit of all residents. If this cannot be achieved then a financial contribution towards off-site provision should be secured by way of legal obligation.

Urban design

45. Chapter 3 of the London Plan sets out key urban design principles to guide development in London. Design policies in this chapter seek to ensure that development optimises site capacity; is of an appropriate form and scale; responds to local character; achieves the highest standards of architecture, sustainability and inclusive design; enhances the public realm; provides for green infrastructure; and respects the historic environment.

Optimising development capacity and residential density

46. Policy D3 of the London Plan states that developments must make the best use of land by following a design-led approach that optimises the capacity of sites. Incremental densification should be actively encouraged to achieve a change in densities in the most appropriate way. Notwithstanding this, the policy states that schemes must also enhance the local context by delivering buildings and spaces that positively respond to the locality, facilitate active travel, distinguish between public and private environments and allow for efficient serving of all land uses on site. In this regard, the proposed scheme has been designed to increase the number of homes within the estate in a way that will also improve passive movements through the site, provide high quality new public realm that is surrounded by land uses that will activate the space. The proposal will increase density within the estate thereby optimising the development capacity of the site in accordance with Policy D3 of the London Plan.

Design scrutiny

47. London Plan Policy D4 requires that all proposals that meet the local definition of a tall building or exceed 350 units per hectare, and that are referable to the Mayor must have undergone at least one design review early on in their preparation before a planning application is made or demonstrate that they have undergone a local borough process of design scrutiny.
48. The proposal has been presented to the Council's Design Review Panel on two occasions and presented to Council's members at the developers briefing. The feedback has generally been positive and the applicant has worked proactively to address comments made. Therefore, the proposals comply with Policy D4 of the London Plan.

Development layout

49. The new built form is expected to greatly improve the layout of the estate that will result in an enhanced living environment for all residents. The block layout and the different typologies employed across the scheme are logical and efficient. Retail and community facilities help activate street frontage and will be located in convenient and accessible locations which is supported.
50. With regards to internal layout, 60% of homes in the scheme are dual or triple aspect. Of the remaining 40% that are single aspect homes, the applicant has stated that 91% of these homes have enhanced aspect with the introduction of

bay windows which provide an alternative angled view out of living rooms. Further, there are no single aspect, north facing units which is welcome. Internal layout of buildings is efficient with all units and houses meeting minimum internal and external floor area standards. The inclusion of family size units at the lower levels of buildings allow for convenient access for families to play areas and surveillance which is supported. The communal and external amenity spaces areas are well thought out and are expected to deliver improved amenity for future residents. The internal layout of buildings raise no strategic concern.

Scale and massing

51. Overall, the proposed massing strategy is consistent with the character of the area and raises no strategic issue as the scheme is expected to sit well within the estate and wider context.
52. The removal of the existing buildings is expected to improve the appearance of the area as a whole and the massing and built form of the new buildings is expected to enhance the streetscape within the estate.
53. Notwithstanding this, in terms of height, Part B of Policy D9 of the London Plan states that tall building should be located within an area identified as suitable for tall buildings and Part C of the policy outlines the impact criteria that must also be considered when determining the suitability of a tall building within a locality.
54. Camden's Local Plan states that the entire borough is sensitive to tall buildings, however it also defines a tall building as anything significantly taller than neighbouring buildings. In this regard, although buildings in the vicinity of the site are of a similar height, as the proposed buildings (up to 12 storeys) will be noticeably taller than those they will replace and the Council has identified the entire borough as being sensitive to tall buildings, GLA officers are of the view that Policy D9 of the London Plan is applicable.
55. The site is not identified in the development plan as being suitable for tall buildings, and so the development does not comply with Part B of Policy D9 in terms of the locational requirements. This issue of non-compliance will need to be weighed against the compliance with the development plan as a whole, including the level of compliance against the criteria listed under Part C of the policy relating to visual, functional, environmental and cumulative impacts. These are considered further below.
56. In terms of visual impacts, the proposed development does not seek to be significantly taller than recently constructed buildings within the estate and surrounding sites and will actually be lower in height than towers within the estate. Given this, GLA officers are of the view that although the tall buildings will alter the visual appearance of the immediate locality, given the simple design approach, proposed materiality and consistency with regards to height and massing with their neighbours, the tall buildings are not expected to result in any detrimental visual impacts upon the wider context including on nearby

heritage or important view corridors. Given this, the proposal tall buildings are not expected to result in unacceptable visual impacts.

57. With regards to the functional impacts of the tall buildings, the proposed residential and commercial uses are consistent with the objectives of the estate renewal and wider area. The general layout of the tall buildings is expected to result in high quality new areas of public realm that will enhance connectivity and useability of open space in the wider area. In terms of layout of uses within the tall buildings, these appear logical and efficient allowing for good activation at ground level and high levels of amenity for future residents.
58. In terms of environmental and cumulative impacts, although it is acknowledged that the density of the scheme is generally consistent with the estate and surrounding redevelopment sites, it is important to ensure that the cumulative impact of these tall buildings in close proximity to the surrounding buildings does not result in a quantum of built form that prevents the delivery of high quality public realm along the surrounding street network in terms of wind micro-climate, daylight and sunlight. The applicant's technical reports on these aspects will need to be fully analysed by the LPA, with any necessary mitigation measures secured.
59. To conclude on tall buildings, despite the site not being located within a recognised tall building zone and therefore not complying with Policy D9, Part B, the proposed height of the new building would not result in unacceptable visual impacts and the development overall is considered to bring about improvements to the townscape and locality, resulting in a scheme that would sit better with both the existing and emerging character of the wider area. As a result, GLA officers are of the view that the impact of the height of the scheme raises no strategic concerns and could meet with the qualitative criteria in Part C of Policy D9 of the London Plan. GLA officers will also consider the findings of the Council's assessment with regards to environmental impacts in order to reach an overall conclusion in relation to compliance with London Plan Policy D9 at Stage 2.

Public realm

60. The proposal includes new public realm fronting the adjacent street network. These areas are expected to integrate well with existing public realm and enhance pedestrian comfort and connectivity. The introduction of street furniture and planting will also enhance the environment thereby improving the amenity for all residents and visitors to the area.
61. As outlined above, it should be ensured that the building layout and separation do not have an adverse impact upon the quality of the new public realm, particularly with regards to micro-climate and overshadowing. Appropriate mitigation should also be secured if necessary to ensure that the comfort levels within the public realm is the highest level possible.

Internal quality

62. The layout of units within the buildings is efficient and allows for adequate levels of privacy between windows and balconies which is welcome. Lobbies, service and communal areas have been positioned in suitable positions to ensure that buildings are activated at ground level and facilities are convenient for residents to access. Further, each of the buildings limits the number of units within each core to eight which accords with London Plan requirements. All units achieve the minimum unit and room size targets set out in Table 3.1 of the London Plan. Overall, the internal layout raises no strategic concern.

Architectural quality

63. The architectural approach considers the character of the surrounding built form in terms of materiality and colour pallet and raises no strategic concern.
64. It is evident that the design, particularly the selection of external materials, has been influenced by the site's surroundings. This approach helps to tie the buildings into the surrounding urban fabric and is welcome. Overall, the architectural approach is expected to result in a high quality scheme and as such raises no strategic issue. The Council should secure high quality materials through appropriately worded conditions.

Heritage

65. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions 'should have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses' and in relation to conservation areas, special attention must be paid to 'the desirability of preserving or enhancing the character or appearance of that area'. If it is judged that harm to the heritage asset/s would arise from the proposed development, considerable importance and weight must be attributed to that harm in order to comply with the statutory duties.
66. The NPPF states that when considering the impact of the proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation and, the more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Significance is the value of the heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset's physical presence or its setting. Where a proposed development will lead to 'substantial harm' to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. London Plan Policy HC1 states that development should

conserve heritage assets and avoid harm, which also applies to non-designated heritage assets.

67. The site is not located within a conservation area and does not contain any listed buildings. In terms of heritage, the two closest conservation areas are the Priory Road Conservation Area (PRCA) immediately to the west of the site and the South Hampstead Conservation Area (SHCA) a short distance to the north. The Alexandra Road Conservation Area is located a short distance to the south-east of the site on the opposite side of the rail line with the St John's Wood Conservation Area located approximately 300 metres further to the south. The nearest listed buildings are the Grade II Church of St Mary and Hall located approximately 100 metres to the north. The Grade II* Alexandra Road Estate and Alexandra Road Park are located approximately 100 metres to the south of the site on the opposite side of the rail line.
68. A Heritage, Townscape and Visual Impact Assessment (HTVIA) has been submitted and assesses the visual impact of the proposal on heritage and townscape within 500 metres of the site, through the submission of key verified views. GLA officers broadly agree with the assessment of significance of the identified heritage assets within the HTVIA.
69. Having considered the HTVIA assessment, GLA officers consider that the proposals would not cause harm to the significance of any surrounding heritage assets. Although the proposal will be visible in certain views from surrounding heritage assets, given the design and appearance of the existing buildings on the site and the improved design of the proposed buildings, GLA officers are of the opinion that this change would be positive. The proposed development has been designed to respect surrounding heritage, and the taller buildings would be seen in context of existing tall buildings in relevant views from heritage assets, thereby not significantly altering their setting. Given this, GLA officers are of the view that the proposal will not result in harm to the significance of nearby heritage assets and as such, the proposal meets with the requirements of Policy HC1 of the London Plan and the NPPF.

Fire safety

70. A Fire Statement was submitted to support the application. The fire documents were prepared by an independent assessor and assesses the proposal against the objectives of Policy D5 and D12 of the London Plan.
71. The statement confirms that the fire strategy is being prepared in accordance with fire safety design codes and practices. The statement outlines the approach (for all buildings) to building construction to ensure the maximum protection against fire, means of escape from units and communal areas, access and servicing for fire equipment, evacuation lifts, the siting of fire appliances and water supply. Further detail are expected to be included within the documents as the design progresses, which the fire statement takes account of. The Council must ensure that all the proposed measures, as detailed in any final statement are secured through appropriate planning conditions, including the provision of evacuation lifts.

Inclusive access

72. London Plan Policy D5 seeks to ensure that proposals achieve the highest standards of accessible and inclusive design (not just the minimum). Policy D7 requires that at least 10% of new build dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings' (designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users); and all other new build dwellings must meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.
73. The submitted Design and Access Statement states that in excess of 10% of the units (15) within the development will meet with the Building Regulation requirements M4(3) and the remaining units will meet Building Regulation requirements M4(2) being 'accessible and adaptable dwellings'. Further, the applicant states that the communal areas including lifts have been designed to be step-free and will meet with M4(3) requirements. The applicant must confirm that at least one lift per core should be a fire evacuation lift suitable to be used to evacuate people who require level access from the building as required by London Plan Policy D5.
74. The LPA should secure M4(2) and M4(3) requirements by condition or planning obligation to ensure compliance with Policy D7 of the London Plan.

Transport

Healthy Street, Vision Zero and ATZ assessment

75. The development must reflect the Healthy Streets and Vision Zero approaches to comply with Policy T1 of the London Plan which requires it to support the Mayor's Transport Strategy (MTS). As such all streets and public realm within and around the site is expected to be designed to support Healthy Streets and Vision Zero.
76. The new pedestrian and cycle connections proposed are supported as they will improve permeability throughout and around the site in line with Policies T2, T3, T4 and D8 of the London Plan. No significant barriers were found that would deter or prevent walking and cycling as a primary mode of transport along the key routes from the site.
77. The upgrades to the Abbey Road/ Belsize Road junction are supported in line with improving cycle connectivity and active travel.
78. Increasing the pedestrian and cyclist access from both Abbey and Belsize Road will improve accessibility and permeability of the site, which is supported in line with Policy T2 of the London Plan.

Trip generation

79. The applicant has undertaken a trip assessment in line with Transport for London's (TfL) guidance. The development will generate an additional net trip

of 49 am peak trips and 35 pm peak trips, with the majority being on-foot and London Underground. Due to the high PTAL of the site, the proposed development is unlikely to have significant negative impact on London's strategic transport network.

Car parking

80. No car parking is provided within the site, excepting disabled persons' parking. This is supported in line with Policy T6 of the London Plan as the number of car parking provision has been significantly reduced from the previous land use.
81. The provision of six disabled persons' parking is supported, as is the mix of five for residential, which is 3% of the total number of dwellings, and one space for commercial unit use. Only a third of the proposed spaces are proposed to have active electrical vehicle charging points (EVCP). All the spaces are strongly recommended to have active provision, secured by condition, to comply with Policy T6.1 of the London Plan Policy.
82. An Outline Car Parking Management Plan (CPMP) has been produced. A detailed CPMP must be produced via condition.

Cycling

83. Long-stay and short-stay cycle parking spaces are proposed for both residential and commercial use. The proposal for 252 long stay and 8 short stay residential and 3 long stay and 12 short stay for commercial, is compliant with Policy T5 of the London Plan.
84. The provision of over 50% of cycle parking spaces at ground level supports accessibility and is encouraged. The provision of 5% of cycle spaces to cater for larger cycles such as cargo bikes, is in line with London Design Cycle Standards (LCDS) is also welcome.
85. The location of the external store in relation to the ground floor storage, should be in close proximity and accessible to all. The proportions of different style cycle parking should be equal between cycle stores.
86. The proposed cycle parking in the public realm should be in easily accessible locations, whilst making sure the footways are still wide enough to comply with TfL's Streetscape Guidance.
87. It should be made clear what land use the two storage areas of the ground floor are as they are unlabelled in the submitted plans. The two land uses, commercial and residential, should have separate storage for security purposes. It is suggested the residential storage should be accessed through the residential lobby for better security for cyclists.
88. There is concern that the entrance to the cycle parking is not under good surveillance due to the location being out of the way by open space, encouraging tail-gating.

Travel planning

89. An outline residential Travel Plan has been submitted. Funding for the implementation and monitoring of a full Travel Plan should be secured in the S106 in line with Policies T1 and Part B of T4 of the London Plan which states that transport assessments should be submitted with development proposals to ensure that impacts on capacity of the transport network and fully assessed
90. A Construction Staff Travel Plan (TP) is encouraged to be produced prior to commencement of any construction activity.

Deliveries, servicing and construction logistics

91. A full Construction Logistics Plan is required in line with Policy T7 of the London Plan policy T7 detailing all logistics and construction proposals to ensure that pedestrian and cyclist movement and safety and bus operations are maintained throughout construction. This will support the Mayor's Vision Zero goal to eliminate deaths and serious injuries from London's transport networks by 2041 and ensure compliance with Part F of Policy T4 of the London Plan which says development proposals should not increase road danger.
92. A framework Delivery and Servicing Plan (DSP) in line with Policy T7 of the London Plan has also been acceptably provided, with two loading bays, one on Belsize Road and one on Abbey Road. Swept paths should however be provided on all vehicle movement from the proposed loading bays on Belsize and Abbey Road, for TfL to determine the impact on the network and the pedestrian movement in those areas.
93. The transport infrastructure impact to accommodate a layby in terms of the proposed moving of the Belsize Road existing bus stop marking, and associated shelter is not considered necessary and not supported. Instead, the bus stop can be relocated to the approaching side of the bus cage, instead of the depart side, where it is currently located, and the bus cage markings can be adjusted accordingly. This would gain an extra 12m for the refuse vehicle parking. The applicant is suggested to revisit this.

Sustainable development

Energy strategy

94. Policy SI2 of the London Plan relates to minimising greenhouse gas emissions and sets out energy strategy requirements for major development proposals, Policy SI3 sets out requirements for energy infrastructure and Policy SI4 sets out requirements to manage heat risk.
95. Once all opportunities for securing further feasible on-site savings have been exhausted, a carbon offset contribution should be secured to mitigate any residual shortfall.

96. The energy strategy has been reviewed by GLA officers who consider it not to be compliant with London Plan energy policies. Subsequently, additional information or consideration regarding the following is required:
- GLA carbon emission reporting spreadsheet must be completed
 - Confirmation of mitigation measures for overheating
 - Investigate opportunities for connection to nearby existing or planned district heating networks (DHNs). Ability to connect to district heat networks.
 - Single point of connection and a communal heating network where all buildings/uses on the site will be connected
 - Roof layout and details of PV to be provided
 - Details of the proposed heating
 - Be Seen monitoring commitment to be secured
97. The proposal would result in the requirement of a carbon offset payment calculated using the GLA's recommended carbon offset price of £95 per tonne. This should be secured within a s106 agreement.
98. Detailed comments regarding Energy have been forwarded under separate cover and these will outline specific measures which should ensure compliance.

Whole Life Carbon (WLC)

99. The applicant has submitted a WLC report which appears to cover much of the assessment requirements, however an Excel version to the GLA WLC template must also be submitted to allow a full review to be completed against the guidance. The WLC templates are available here:
<https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-guidance/whole-life-cycle-carbon-assessments-guidance>
100. The applicant should submit a WLC assessment template in full. This is important to allow results to be recorded and tracked through to the post-construction stages, and to allow a proper review of the results against material quantities and other assumptions made.

Circular Economy

101. London Plan Good Growth objective GG5 states that those involved in planning and development should recognise and promote the benefits of transition to a circular economy as part of the aim for London to be a zero-carbon city by 2050. Policy D3 further states that the principles of the circular economy should be taken into account in the design of development proposals in line with the circular economy hierarchy. London Plan Policy SI7 requires major applications to develop Circular Economy Statements.

102. The applicant has provided a Circular Economy Statement for review which included an Operational Waste Management Plan. GLA officers are of the view that the approach outlined within the statement is generally consistent with that required by the London Plan. The council should ensure that initiatives outlined fully accords with the requirements of Policies D3 and SI 7 of the London Plan and that the strategy be secured as part of any consent issued, including post construction reporting.

Environmental issues

Urban greening and biodiversity

103. London Plan Policy G1 encourages development proposals to incorporate elements of green infrastructure, which should be planned, designed, and managed in an integrated way to achieve multiple benefits. London Plan Policy G5 states that developments should include urban greening as a fundamental element of site and building design. Policy G5 also sets out a new Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. Policy G6 of the London Plan states that developments should manage impacts on biodiversity and aim to secure net biodiversity gain.
104. The applicant has calculated the Urban Greening Factor (UGF) score of the proposed development as 0.42, which meets the target set by Policy G5 of the London Plan. The proposed development is therefore compliant with Policy G5 of the London Plan.
105. London Plan Policy G6 states that proposals that create new or improved habitats that result in positive gains for biodiversity should be considered positively. Policy G6 further states that development proposals should aim to secure net biodiversity gain. The applicant has provided a Biodiversity Net Gains (BNG) Assessment, which concluded that there will be a 100.6% increase in BNG.
106. GLA officers are of the view that the applicant has made every attempt to maximise urban greening on the site to meet with UGF targets. The proposed urban greening and biodiversity improvement is considered appropriate when assessed against the requirements of Policies G1, G5 and G6 of the London Plan.

Sustainable drainage and flood risk

107. The site is located within Flood Zone 1 and the area benefits from flood defences. In accordance with Policy SI 12 of the London Plan, a Flood Risk and drainage assessment (FRA) formed part of the planning submission. The FRA states that the proposed land use is appropriate for Flood Zone 1, and the NPPF Sequential Test and Exception Test are not required.
108. The assessment outlines the flood risk mitigation strategy for the development. With regards to surface water drainage, a strategy (SuDS) has been developed

to limit discharge from all rainfall events up to and including the 1% (1 in 100) AP events plus 40% climate change allowance to a 2.5 l/s. The SuDS proposed in the drainage strategy include green roofs, porous paving material, rain gardens and geocellular attenuation tanks. The FRA states that the SuDS proposed are expected to result in a development that reduces the impermeable footprint in comparison to the existing scenario and as such, floodplain compensation is not required.

109. In summary, the FRA demonstrates that the proposed development is safe and in accordance with the requirements of national and local planning policy. The LPA should secure all necessary mitigation requirements of way of condition.

Air quality

110. Policy SI 1 (Improving Air Quality) of the London Plan states that any development proposal should not lead to further deterioration of existing poor air quality and not be located or operated in a manner that would subject vulnerable people to poor air quality.
111. The application is accompanied by an Air Quality Assessment Report in line with London Plan Policy SI1, inclusive of an Air Quality Neutral Assessment. The proposed development is not located within an Air Quality Focus Area (although within close proximity) and is 'car-free' which is compliant with the relevant policy.
112. The Council should ensure that the relevant recommendations of the above report are appropriately secured, including compliance with the Non-Road Mobile Machinery Low Emission Zone for London standards, and measures to control emissions during construction in accordance with London Plan Policy SI1.

Local planning authority's position

113. Camden Council planning officers are currently assessing the application. In due course the Council will formally consider the application at a planning committee meeting.

Legal considerations

114. Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged; or, direct the Council under Article 6 of the Order to refuse the application; or, issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application (and any connected application). There is no

obligation at this stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Equality considerations

115. The 2010 Equality Act places a duty on public bodies, including the GLA, in the exercise of their functions, to have regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it. This requirement includes removing or minimising disadvantages suffered by persons who share a protected characteristic that are connected to that characteristic and taking steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it. The Act defines the protected characteristics, and in this case those of age, that are pregnant and those mobility issues are of particular relevance. For the avoidance of doubt, GLA officers have had due regard to the duty under the Equality Act 2010 in the consideration of this case. As set out in paragraph 29, whilst the proposals will result in the demolition of the existing community health care facilities, replacement facilities will be reprovided within phase 2 of the redevelopment. The LPA should ensure that the replacement community facilities are operational prior to the closure of the existing community health care facilities to ensure there is no loss (even temporary) of community floorspace.
116. It is noted that the applicant has provided an equalities statement that assessed the proposal against the requirements of the Equality Act. The statement identifies those most likely to be affected by the proposal and how. The statement concludes that the proposal would not have a negative impact on protected groups or characteristics and that the benefits of the redevelopment will have a beneficial effect on all members of the community including those with protected characteristics.
117. In conclusion, GLA officers are of the opinion that subject to the delivery of the new community health care facility occurring prior to the closure/demolition of the existing facility to ensure an uninterrupted service, the overall benefits of the proposal would limit the extent of negative impacts on people sharing a protected characteristic and that as a whole the benefits outweigh any residual negative impacts.

Financial considerations

118. There are no financial considerations at this stage.

Conclusion

119. London Plan policies on housing, affordable housing, urban design, heritage, inclusive design, sustainable development, green infrastructure, and transport are relevant to this application. Whilst the proposal is supported in principle, the application does not currently fully comply with some of these policies, as summarised below:

- **Land Use Principles:** The redevelopment of part of the estate for residential, community and employment floor space along with public realm improvements is supported. Overall, and subject to Council securing floorspace and suitable rent levels, the estate renewal meets with the requirements of the London Plan and the GPGER.
- **Housing:** The proposal will increase housing within the estate including additional social rent affordable units which is strongly supported. The Financial Viability Assessment is currently being scrutinised by the GLA's viability team with a view to ensuring that the maximum amount of additional affordable housing is being delivered. Early and late stage reviews should be secured.
- **Urban Design and Heritage:** The scheme raises no strategic concerns with regards to layout, scale, appearance and accessibility and the new improved public realm with substantial playspace is welcome. The scheme will not harm any nearby heritage assets.
- **Transport:** The proposals are broadly in line with London Plan transport policies, but an increase active electric vehicle charging points is recommended, and clarifications on the design and location of cycle parking are required. The proposal to relocate a bus stop to accommodate a servicing layby is not supported and should be revised.
- **Sustainability and Environment:** The scheme will meet with urban greening and biodiversity requirements. Further information on energy, WLC and circular economy is required, and mitigation measures on flood risk and air quality should be secured by condition.

For further information, contact GLA Planning Unit (Development Management Team):

Scott Schimanski, Principal Strategic Planner (case officer)

email: scott.schimanski@london.gov.uk

Katherine Wood, Team Leader – Development Management

email: Katherine.wood@london.gov.uk

Allison Flight, Deputy Head of Development Management

email: alison.flight@london.gov.uk

John Finlayson, Head of Development Management

email: john.finlayson@london.gov.uk

Lucinda Turner, Assistant Director of Planning

email: lucinda.turner@london.gov.uk

We are committed to being anti-racist, planning for a diverse and inclusive London and engaging all communities in shaping their city.