



Real value in a changing world

Planning *Statement* - UCLH NHS Foundation Trust

Middlesex Hospital Annex, Cleveland Street, London

June 2010

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Executive Summary

This Planning Statement is submitted on behalf of UCLH NHS Foundation Trust. It relates to the Middlesex Hospital Annex on Cleveland Street, London.

The proposal is for the demolition of the existing Annex building and redevelopment to provide a building ranging between 3-10 storeys in height across the site. The existing building is in a poor condition and has been vacant since 2006. The development is to be residential led delivering a total of 142 units, with above 50% floorspace as affordable housing, and approximately 400 sq metres of commercial/ retail floorspace at ground floor, with a range of associated benefits.

The site lies within the Central London Area and Charlotte Street Conservation Area, and is allocated by the Council for future redevelopment. Formal applications are submitted for planning permission and conservation area consent. The Statement describes how the new scheme will regenerate a currently vacant site and provide a development of high design quality in the context of creating a viable scheme for the site, which delivers the S106 legacy requirement.

It also describes how the proposals will enhance the conservation area, sets out the reasons for redevelopment of the site and provides a justification for a change in land use to housing.

1 Introduction

- 1.1 This Planning Statement has been prepared for UCLH NHS Foundation Trust by the Jones Lang LaSalle Planning Group. It concerns the Middlesex Hospital Annex site which currently hosts a 4 storey former hospital building. A site plan is included at **Appendix 1**.
- 1.2 The planning proposal is to redevelop the building with a residential led scheme of varying heights, which extends to 10 storeys at its south eastern corner. This document provides the planning background to the site, outlines the proposals, and then identifies how it complies with relevant planning policies.
- 1.3 The Statement is set out as follows:
 - Section 2: The site, its surroundings and planning history
 - Section 3: The proposals and pre-application consultation
 - Section 4: Relevant planning policy (including local, regional and national guidance)
 - Section 5: Affordable Housing Viability Overview
 - Section 6: Justification for planning permission
 - Section 7: Conclusions
- 1.4 Applications for planning permission and conservation area consent are submitted. In addition to this Statement, the following documents form part of the proposals:
 - Design and Access Statement– by CZWG Architects
 - Heritage and Urban Design Appraisal– by KM Heritage
 - Daylight/Sunlight and Shadow Study – by Delva Patman Associates
 - Energy Assessment – by Peter Brett Associates
 - Sustainability Statement – by Peter Brett Associates
 - Air Quality Assessment – by Peter Brett Associates
 - Noise Assessment - by Peter Brett Associates
 - Flood Risk Assessment – by Peter Brett Associates
 - Phase 1 Ground Condition Report – by Peter Brett Associates
 - Transport Assessment – By WSP
 - Statement of Community Involvement – Four Plc
 - Affordable Housing Viability Report – JLL and Savills

2 The site, its surroundings and planning history

The application site and its surroundings

- 2.1 The application site is located in the south west section of the London Borough of Camden, on the border with the City of Westminster. The borough boundary runs along Cleveland Street, the west side of the street lying within the administration of Westminster and the east side within Camden.
- 2.2 The site comprises only the Middlesex Hospital Annex building which was the former outpatients' building. The site extends to 0.305 hectares. It is located within the Central London Area and Charlotte Street Conservation Area. It is not located within an Archaeological Priority Area. The only access to the site is from Cleveland Street.
- 2.3 The site is bounded to the immediate north by UCL buildings, to the south by Middlesex House and to the east by Astor College. On the opposite side of Cleveland Street lie the King and Queen public house and mixed uses at ground floor, including an art gallery and restaurants with residential use above. Further to the South along Cleveland Street lies the cleared former Middlesex Hospital site.
- 2.4 The Grade II listed BT tower lies approximately 150 metres to the north as the tallest landmark building within the vicinity. To the north of the UCL buildings is Howland Street, to the east behind Astor College lies Charlotte Street and to the south lies Tottenham Street. Tottenham Mews extends north of Tottenham Street ending close to the southern boundary of the site.
- 2.5 Historically, the site existed as the Covent Garden Workhouse which was built in 1778. Following additions to the Workhouse, the use transferred to an Infirmary in 1868.
- 2.6 The current Middlesex Hospital Annex building was constructed in the 1880s and predominantly comprises yellow brown stock brick. It extends to 4 storeys in height and displays a U shaped front.
- 2.7 The building is not listed and a previous application to list the building was rejected recently in 2008. It is also not afforded any other material status by Camden Council. Whilst it lies within the Charlotte Street Conservation Area, it is not identified as a positive contributor.
- 2.8 The Annex ceased from being used for hospital purposes in 2006 and is presently occupied as part of Camelot security (protection by occupation) until redevelopment comes forward. The entrance and front of the site are currently boarded up with restricted access to the temporary occupants.
- 2.9 The surrounding area includes a mix of uses with art galleries, offices, pubs and restaurants along Cleveland Street with the southern section of the street displaying less active frontage.
- 2.10 The site is readily accessible, with a number of bus services in the local area. The nearest underground stations are Goodge Street to the east and Warren Street and Great Portland Street to the further north. It has a PTAL rating of 6.
- 2.11 Within the surrounding area, there is a range of building heights with a concentration of taller buildings to the north and lower buildings to the south. Section 2.8 of the Design and Access Statement provides a detailed analysis of surrounding building heights and notable tall buildings in the area.
- 2.12 The nearest public open space includes Regent's Park as the largest to the north and smaller public squares including Bedford Square, Russell Square Gardens, Cavendish Square and the grounds of St Giles in the Fields.

Planning History

- 2.13 A review of the site's planning history records has been undertaken. There is only one record which relates directly to the Annex site. This includes the installation of a six person lift in 1991. Whilst it is understood the building was constructed in the 1880s, there are no further records detailing any planning applications on the site.

9130004	The Middlesex Hospital Out Patients` Department Cleveland Street W1	The installation of a six person lift to the south west corner of the main Out Patients` Department as shown on drawing numbers ML/SK1 MXH 1 MXH 2 and QG.	FINAL DECISION	22-03- 1991	Observations - No Objections
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- 2.14 In terms of other history which links to the site, there is a consolidated section 106 agreement dated 2004 which primarily relates to the redevelopment of the University College Hospital, Tottenham Court Road and the Odeon site. This is linked to the Middlesex Hospital Annex building as the Annex site was intended to be used for providing affordable housing, linked to the wider redevelopment of the Hospital.
- 2.15 Interpretation of the S106 agreement has been the subject of continuing debate. However, in summary it is believed that it requires the provision of 25% of units (or a minimum of 30 units) within any proposed new development replacing the Middlesex Hospital Annex building to be affordable housing of social rented tenure.
- 2.16 In addition to this, there is a further requirement that if the 'Odeon site' planning permission is implemented, a further 1425 sq m (or 14 units) of affordable housing is required.

3 The proposals and pre-application consultation

The Proposals

- 3.1 The site as outlined on the red line plan (Drawing number 1748-00-DR-0001, Rev D01) is owned freehold by UCLH NHS Foundation Trust. The site area extends to 0.305 hectares.
- 3.2 It is proposed to demolish the existing 4 storey building and to redevelop the site to provide a new residential building with a small component of commercial/ retail space at ground floor level. The building will be developed around a central courtyard providing a focal open space for the residents.
- 3.3 Full planning permission and conservation area consent are sought for the proposals.

In summary the proposals include:

The proposed building, height, floorspace, and breakdown of units

Building and height

- A high quality building of varying heights from 3 to 10 storeys breaking down into a series of smaller elements
- Set backs at upper levels
- 4 cores with individual entrances, Cores A and B containing affordable housing and Cores C and D containing private housing.

Floorspace

- 12,679.5 sq m GIA residential floorspace
- 396.5 sq m GIA commercial/ retail floorspace
- 51.2% affordable (59.4% social rented/ 40.6% intermediate) and 48.8% private by GIA

Breakdown of units

- 70 affordable units and 72 private units
- Affordable units: 34.2% 1 bed; 48.6% 2 bed; 12.9% 3 bed and 4.3% 3 bed+
- Private units: 48.6% 1 bed; 43.05% 2 bed; and 8.3% 3 bed

Density

- 1298 habitable rooms/ hectare
- 465 units/ hectare

Amenity Space/ Playspace

SHARED AMENITY (Total: 1082 sq m - includes play space)

Ground floor courtyard	355 sq m
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Rooftop terraces	727 sq m
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PRIVATE AMENITY (Total: 1226 sq m)

Lower ground floor gardens	347 sq m
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Courtyard terraces	88 sq m
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Upper level roof terraces	396 sq m
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Balconies	395 sq m
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Access

- The main vehicular access to the site will be from Cleveland Street via a sloping slab with a gradient of less than 1:20 to the basement.
- Refuse vehicles will reverse into the site from Cleveland Street and collect refuse from the basement holding area.
- Pedestrian access is directly from Cleveland Street through to the central courtyard. From the central courtyard, level access is provided to each of the residential cores. A walkway along the southern boundary of the site also offers an alternative route to the courtyard.

Parking

- 237 cycle parking spaces (230 secure resident spaces, 2 secure commercial/ retail employee spaces and 5 visitor spaces)
- Car Parking: 2 car club spaces with electric charging points, 14 disabled spaces with electric charging points and 11 electric vehicle only charging points.

Sustainability

- Green roofs
- Efficient communal heating infrastructure
- Use of sustainably sourced materials
- Energy and Water efficient fittings
- A flexible and adaptable building (framed concrete construction, a column grid and lightweight plasterboard partitions)
- Cycle parking and electric vehicle charging points

- Provision of solar energy by photo voltaics and solar hot water
- High levels of insulation and air tightness
- Optimisation of passive and natural energy systems
- On site renewables

Pre-Application Consultation

Camden

- 3.4 Preliminary discussions with Camden Council commenced in May 2009 to discuss objectives for the site and the selection of Architects to take a suitable scheme forward.
- 3.5 At this stage, the concept of a residential led scheme was put forward by the Applicant to Camden Council, which was received favourably. Camden noted key considerations which would need to be addressed in creating the proposal. This included providing a high quality development which adds positively to the townscape; consideration of height, in light of Cleveland Street's narrow form; provision of amenity space; provision of affordable housing and S106 contributions.
- 3.6 Following on from this meeting, two formal further pre-application meetings were held with Camden in October 2009 and March 2010.

In summary, the key items discussed included the following:

- Affordable/ Private split and its relation to viability and the historic S106 Agreement - need to ensure that the requirements of the historic S106 Agreement are clearly met in the forthcoming planning application
 - Height and form of the development – concerns regarding height solutions on the Cleveland Street frontage in the early design proposals
 - Car and cycle parking – desire to see provision of cycle spaces in accordance with policy and a car free development
 - Daylight/ sunlight – need to ensure adequate light to the courtyard; that the units within the development receive adequate levels; and that the scheme does not have detrimental impact on neighbouring properties
 - Access to the basement and servicing strategy – need to ensure suitable servicing strategy
 - Provision of open space/ playspace – high levels encouraged
 - Sustainability – desire for highest level possible
 - Detailed design and use of materials – design needs to be exemplary and fit into the context of the conservation area
 - Potential for a new link through the site to Charlotte Street - encouraged
 - Scheme Viability - a robust Viability case needs to be put forward to convince Camden's officers and its Members
- 3.7 In addition to the formal pre-application meetings with Camden, a number of meetings also took place with Camden's Conservation Officer, Edward Jarvis and Camden's housing officer, Mike Cox to ensure the most suitable design solution and a satisfactory housing mix in line with Camden's requirements.

Community

- 3.8 To undertake full engagement with the local community and interested third parties, a community liaison consultant (Four Communications) was appointed to facilitate participation.
- 3.9 Full details of the community consultation with feedback is contained within the Statement of Community Involvement.

In summary, the main comments included:

Design - Mixed responses -Some supportive as they want to see a replacement building on site and feel good attention to detail has been made. Others concerned about design detail and height.

Affordable housing – Desire to see a high quantity provided and potential for key worker accommodation.

Parking – Comments for and against. Some considered the development should be car free and others were keen to see car parking provided to avoid further on street parking pressures.

Ground floor retail/ commercial units – Want to see flexibility for smaller businesses.

Heritage – some concerns regarding demolition of the existing building and desire to see its history reflected in a new building.

Sustainability – keen to see open space and sustainability measures incorporated.

4 Relevant Planning Policy

- 4.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that applications for development must be determined in accordance with the development plan, unless material considerations indicate otherwise. Other material considerations include items such as inter alia, national planning policy guidance or statements, up to date research or site specific reasons.

- 4.2 This section examines the key planning policy most relevant to the proposals. It looks at factors relevant to the creation of new residential development, the change of use, and conservation and design issues.

Specific policies are also explained in further detail in the accompanying Consultant reports to this application, e.g. the Transport Statement includes full analysis of the Council's transport policies.

National level

PPS 1: Delivering sustainable development, January 2005

- 4.3 PPS 1 aims to ensure that planning facilitates and promotes sustainable and conclusive patterns of development. It promotes a high quality of design promoting mixed uses which reduce the need to travel. It recognises also that all local economies are subject to change and that planning authorities should be sensitive to these changes and the implications for development in growth.

PPS 3: Housing, November 2006

- 4.4 Paragraph 10 (Planning for Housing Policy Objectives) provides the context for planning for housing through development plans and planning decisions. It encourages the planning system to deliver 'a flexible, responsive supply of land – managed in a way that makes efficient and effective use of land, including re-use of previously developed land, where appropriate.'
- 4.5 PPS 3 re-iterates that good design is fundamental to the development of high quality new housing, which contributes to the creation of sustainable, mixed communities. Specifically, paragraph 13 states, 'Reflecting policy in PPS1, good design should contribute positively to making places better for people.'
- 4.6 In identifying suitable locations for housing development, paragraph 36 seeks to ensure that housing is developed in suitable locations which offer a range of community facilities and with good access to jobs, key services and infrastructure. It advises this should be achieved by making effective use of land and the priority for development should be previously developed land, in particular vacant and derelict sites and buildings.
- 4.7 Options for accommodating new housing growth (or renewal of existing housing stock) are put forward in paragraph 38 taking into account opportunities for, and constraints on, development. Options cited include re-use of vacant and derelict sites or industrial and commercial sites for providing housing as part of mixed-use town centre development.
- 4.8 The document re-iterates the importance of effective use of land and re-using previously developed land. It notes that the national annual target is that at least 60 per cent of new housing should be provided on previously developed land. This includes land and buildings that are vacant or derelict as well as land that is currently in use but which has potential for re-development.

PPG13: Transport, April 2001

- 4.9 PPG 13 aims to reduce the need to travel, especially by car and to accommodate housing principally within existing urban areas.

- 4.10 Paragraph 13 seeks to, 'promote more sustainable patterns of development and make better use of previously developed land' with the focus for additional housing being in existing towns and cities.'

PPS 5: Planning for the Historic Environment, March 2010

- 4.11 The national policy framework applicable to the historic built environment is contained in Planning Policy Statement 5 (PPS5), "Planning for the Historic Environment," published in March 2010. PPS5 merges listed buildings, conservation areas and scheduled monuments into one category of Designated Heritage Assets for the purposes of national policy.
- 4.12 PPS5 sets out the Government's objectives in paragraph 7 as being (in summary) to:
- Deliver sustainable development.
 - Conserve England's heritage assets in a manner appropriate to their significance.
 - Contribute to our knowledge and understanding of our past (this applies in particular to excavation of archaeological sites and to demolition of buildings)
- 4.13 Policy HE7 provides principles guiding the determination of applications for consent relating to all heritage assets.
- 4.14 Paragraph HE7.2 states that local planning authorities should take into account the nature of the significance of the heritage asset and the value that it holds for this and future generations in considering the impact of a proposal on a heritage asset. This is to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposals.
- 4.15 Paragraph HE7.5 advises local planning authorities to take into account the desirability of new development making a positive contribution to the character and local distinctiveness of the historic environment. The consideration of design should include scale, height, massing, alignment, materials and use.
- 4.16 HE7.7 states that where loss of significance is justified on the merits of new development, local planning authorities should not permit the new development without ensuring the new development will proceed after the loss has occurred. This can be ensured via planning conditions or obligations by agreement.

Greater London

The London Plan (consolidated with alterations, February 2008)

- 4.17 The site lies within the London Plan's identified Central Activities Zone (CAZ).

Housing

- 4.18 The London Plan aims to increase the supply of housing and encourages London boroughs to promote policies that seek to achieve and exceed this target.
- 4.19 Policy 3A.3 relates to the objective for maximising the potential of sites. It aims to ensure that development proposals achieve the maximum intensity of use compatible with local context, design principles and public transport capacity. A range of housing choice in terms of housing mix, 10% wheelchair accessibility and housing built to lifetime homes is expected.
- 4.20 For central locations with a PTAL rating of 4-6, the London Plan density matrix (Table 3A.2) suggests a range up to 1100 hr/ha / 405 units per hectare. The site measures 0.305 hectares.

- 4.21 Policies 3A.9 and 3A.10 encourage the provision of affordable housing in schemes. 3A.9 encourages 50% of affordable housing in new schemes though this policy is becoming less rigid through the emerging replacement London Plan. Boroughs are encouraged to seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed-use schemes. However, it states, 'targets should be applied flexibly, taking account of individual site costs, the availability of public subsidy and other scheme requirements.'
- 4.22 Policy 3A.18 aims to protect and enhance social infrastructure and community facilities. Policies are to ensure appropriate facilities are provided within easy reach and the net loss of such facilities is resisted.

Transport

- 4.23 Policy 3C.1 encourages joint working to ensure integration of transport and development. It encourages patterns and forms of development that reduce the need to travel, especially by car; seeks to improve public transport, walking and cycling capacity accessibility; supports high trip generating development at locations with high levels of public transport accessibility; and encourages integration of major transport infrastructure plans with improvements to public realm.
- 4.24 Policy 3C.1 encourages measures to shift to more sustainable modes and appropriate demand management.

Renewables

- 4.25 Policy 4A.7 presumes that developments will achieve a reduction in carbon dioxide emissions of 20% from on site renewable energy generation unless it can be demonstrated that such provision is not feasible.
- 4.26 Sustainability is high on the agenda and encouraged through a number of measures including sustainable drainage, efficient use of water and resources, and minimising impact on items such as air quality.

Design

- 4.27 Policy 4B.1 seeks to achieve a number of design measures, principally including high quality, inclusive design which is sustainable and adaptable for users. Policy 4B.2 encourages contemporary and integrated designs for the built environment.

Playspace

- 4.28 Policy 3D.13 seeks to ensure that all children have safe access to good quality, well-designed, secure and stimulating play and informal recreation provision. It requests that developments that include housing make provision for play and informal recreation, based on expected child population generated by the scheme and an assessment of future needs.

Views

- 4.29 The Draft London View Management Framework which is due to be adopted soon proposes a widened view of Westminster Palace to Parliament Hill which would include the Middlesex Hospital Annex site within this.

Mayor of London Housing SPG, November 2005

- 4.30 This guidance sets out an indication on housing mix as a general guide to London Boroughs but recognises there may be changing needs and circumstances in different localities.

<u>Overall housing mix</u>	1 bedroom household 32% 2/3 bedroom household 38% 4 bedroom or larger household 30%
<u>Social housing mix</u>	1 bedroom household 19% 2/3 bedroom household 39% 4 bedroom or larger household 42%
<u>Market housing</u>	mix 1 bedroom household 25% 2/3 bedroom household 75% 4 bedroom or larger (<i>dependent on specific circumstances</i>)
<u>Intermediate housing</u>	mix 1 bedroom household 66% 2/3 bedroom household (<i>dependent on specific circumstances</i>) 4 bedroom or larger household 34%

Local Level (London Borough of Camden)

Camden's Unitary Development Plan June 1996 – Saved Policies Updated Version June 2009

(And Emerging policy from Camden's Local Development Framework (LDF) noted in italics where applicable)

- 4.31 A number of policies from Camden's UDP have been saved. This is because changes through the Planning and Compulsory Purchase Act required that policies only remain in place for three years after adoption of the Plan. These saved policies will still be used for development control purposes until they are replaced by emerging documents from the Council's Local Development Framework (LDF). The policies which are considered most relevant to the proposed development are identified below.
- 4.32 The site is allocated on the 2006 Proposals Map as being situated within a Conservation Area and the Central London Area. It is also noted as being included on the schedule of land use proposals and within a Strategic View wider setting consultation area.

Housing

- 4.33 Housing is the priority land use of the UDP. The Plan seeks to increase the supply of housing in the Borough and secure more accommodation that is affordable to those on middle or low incomes. It also seeks to meet the housing needs of groups with special needs and provide a range of housing in terms of size and type to meet the needs of Camden's diverse communities.
- 4.34 At Strategic level, UDP Policy S4 (Housing) seeks to secure net additions to the housing stock wherever possible and retain existing permanent residential accommodation.
- 4.35 Policy H1 (New housing) advises the Council will grant planning permission for development that increases the amount of land and floorspace in residential use and provides additional residential accommodation, provided that the accommodation reaches acceptable standards. The Council will seek to secure the fullest possible residential use of vacant and underused sites and buildings, and may require suitable sites to be developed for primarily or wholly residential use.
- 4.36 Policy H2 of the UDP states that affordable housing will be sought within all residential developments with capacity for 15 or more dwellings or if the site has an area of 0.5 ha or more. As a guideline, a split of 70%/30%

social rented/ intermediate provision is also sought. *In line with the London Plan however, the emerging LDF is now seeking a threshold of 10 or more dwellings or 1,000 sqm floorspace and this also encourages a change in split to 60%/40% social rented/ intermediate.*

- 4.37 The general thrust of Policy H8 (Mix of Units) seeks to ensure an appropriate mix of unit sizes, including small and large units. Through this policy the Council will consider the mix and sizes of units best suited to site conditions and the locality.
- 4.38 Policy LU1 (Schedule of Land Proposals) expects development to be in accordance with the guidance set out in the Schedule of land use proposals. It states that where proposed development is not in accordance with the guidance, planning permission will not be granted, unless it can be demonstrated that changing circumstances or site specific considerations mean an alternative form of development, which also accords with other relevant UDP policies, is more appropriate.
- 4.39 The schedule specifies mixed uses as appropriate for the Annex site, with predominantly residential as the preferred use.
- 4.40 *Camden's Site Allocations document (Site 21) which is emerging as part of its LDF also carries forward this objective noting that the site is suitable to accommodate primarily residential led development and that it is an area suitable for a range of uses.*

Transport

- 4.41 Policy T1 (Sustainable Transport) states that the Council will grant planning permission for development which would encourage walking, cycling and public transport and T3 (Pedestrians and cycling) advises planning permission will only be granted where satisfactory provision is made for pedestrians and cyclists.
- 4.42 T7 (Off-street parking, city car clubs and city bike schemes) advises that the Council will only grant planning permission for development that complies with the Council's Parking Standards and seeks provision of electric vehicle charging equipment where off street parking is provided. It also encourages the provision of city car clubs and city bike schemes as an alternative to private off-street parking.
- 4.43 Policy T8 (Car free housing and car capped housing) seeks car free housing or car capped housing in the Central London Area.
- 4.44 Camden's parking standards for a low provision area equates to 0.5 car parking spaces/ unit and 1 cycle space per unit with provision for visitor cycle spaces. This principle is being carried forward by the proposed Development Policies of the emerging LDF.
- 4.45 *Policy CS3 of the Core Strategy also refers to highly accessible areas of Central London. It considers these areas appropriate for the provision of homes, shops, food, drink and entertainment uses, offices and community facilities.*

Conservation Areas

- 4.46 Policy B7 (Conservation Areas) aims to preserve or enhance the special character of these areas and to only grant consent for development that complies with this objective. It also advises that, 'the Council will not grant conservation area consent for the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area, unless exceptional circumstances are shown that outweigh the case for retention.'

- 4.47 *Policy CS14 of Camden's emerging Core Strategy seeks to promote high quality places and to conserve its heritage. It requires development of the highest standard and design which respects local context and character and aims to preserve and enhance Camden's conservation areas and heritage. It also protects important views including St Paul's Cathedral and the Palace of Westminster.*

Sustainability

- 4.48 In relation to Resources and Energy, Policy SD9 addresses air quality, water and use of energy and resources. It aims to ensure air quality is not harmed and for mitigation measures to reduce impact where potential harm may be identified. It aims to protect the water environment and conserve energy and resources.

Design and Density

- 4.49 Policy B1 (General design principles) states that the Council will grant planning permission for development that is designed to a high standard.

Development should:

- a) respect its site and setting;
- b) be safe and accessible to all;
- c) improve the spaces around and between buildings, particularly public areas;
- d) be sustainable by promoting energy efficiency and efficient use of resources;
- e) be easily adaptable to changing economic and social requirements;
- f) provide appropriate high quality landscaping and boundary treatments; and
- g) seek to improve the attractiveness of an area and not harm its appearance or amenity.

- 4.50 Policy SD4 (Density of development) seeks to ensure development makes full use of the potential of a site and will not grant planning permission for development that makes inefficient use of land. High density development is expected at locations in the Central London Area.

Central London Area

- 4.51 The southern part of the borough is referred to as the Central London Area. It covers a similar area to that defined for Camden by the Central Activities Zone (CAZ) in the London Plan.
- 4.52 The Central London Area is acknowledged to experience the most intense development trends and pressures and high density development is encouraged. It is noted as having the best access to public transport, offers the best potential for a mix of uses, and has a need for additional housing to provide a balance with community uses, and to support shops, services and local amenities.
- 4.53 General Industry and warehousing are generally seen to be unsuited to the Central London Area.

Open Space

- 4.54 Policy N4 relates to Providing Public Open Space. It states that the Council will only grant planning permission for development that is likely to lead to an increased use of public open space where an appropriate contribution to its supply is made.

Planning Obligations

- 4.55 Policy SD2 refers to Planning Obligations and states, 'Where existing and planned provision of infrastructure, facilities and services is not adequate to meet the needs generated by a proposal, the Council will use planning obligations to secure measures, directly related in scale or kind to the proposal, to meet those needs.'
- 4.56 In the explanatory text it is noted that 'Planning obligations should be directly related to the proposed development and fairly and reasonably related in scale and in kind, in accordance with Circular 1/97' – Planning Obligations.
- 4.57 The items sought through a planning obligation will vary depending on the individual nature of each development and site.

Daylight/Sunlight

- 4.58 Policy SD6 is specific to amenity for occupiers and neighbours. It states that to protect amenity the Council will consider a number of factors. One of these includes sunlight and daylight levels.
- 4.59 It requires that the design of development should give consideration to overlooking and the potential effects on privacy, and allow sufficient daylight and sunlight into buildings and land. The Council applies the standards recommended in the Building Research Establishment's 'Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice' (1991).

Camden Planning Guidance 2006

- 4.60 This document acts as supplementary guidance to the UDP and sets out the following standards in respect of residential development:

New self-contained dwellings should normally satisfy the following minimum areas for overall floorspace (excluding communal lobbies and staircases):

Number of persons	1	2	3	4	5	6
Minimum floorspace (sq metres)	32	48	61	75	84	93

Camden also expects bedrooms to meet the following minimum sizes:

First and double bedrooms 11.0 sq m

Single bedrooms 6.5 sq m

Privacy

- 4.61 Camden Planning Guidance, section 29, addresses overlooking and privacy. It aims to protect overlooking from new developments. It advises that in order to ensure privacy, there should normally be a minimum distance of 18m between the windows of habitable rooms of different units that directly face each other.

5 Affordable Housing Viability Overview

Requirement for affordable housing

- 5.1 The provision of affordable housing within forthcoming proposals for the Middlesex Hospital Annex site is an issue which has not only been raised by LBC but also by a number of consultees during the consultation process.
- 5.2 Whilst there is a policy requirement (Policy H2 – Affordable Housing within Camden’s Unitary Development Plan 2006) to deliver a percentage of affordable housing within new development, there is also a historic S106 legal agreement which relates to the site. This legal agreement has arisen through the Trust’s wider consented plans for the University College Hospital redevelopment on Euston Road and the Odeon site on Grafton Way/ Tottenham Court Road.
- 5.3 In summary, the historic legal requirement entails the following:
- In respect of the Original Hospital redevelopment site permission, 25% of the total number of units within the scheme (subject to a minimum of 30 units) – all to be social rented
 - In respect of the Odeon Site planning permission, 1425 sq m of affordable housing

Background to UCLH NHS Foundation Trust and its position

- 5.4 The Trust is one of the largest and most complex NHS Foundation Trusts and has a clear and consistent vision, **‘UCLH is committed to delivering top quality patient care, excellent education and world class research.’** It should be noted that it is a ‘not for profit’ organisation and that the capital receipt generated from the development proposal at the Middlesex Hospital Annex, will be utilised to secure further enhancements to patient care and the level of service which UCLH delivers.
- 5.5 To date the Trust has continuously strived to meet its vision and has secured a number of patient focused projects derived directly from active management of its estate. These include:
- The Cancer Centre, currently under construction
 - 33 Queen Square at the National Hospital for Neurology and Neurosurgery
 - The IMRI Project at the National Hospital for Neurology and Neurosurgery
 - The Brain Suite
 - Neurometabolic Pathology and Pharmacy refurbishments at the National Hospital for Neurology and Neurosurgery
 - Reconfiguration of A&E
 - Education Centre
 - Numerous clinical schemes on annual capital programme
- 5.6 The recent ‘credit crunch’ has placed constraints on the Trust as Central Government has had to rethink its funding to health services for both the short and medium term. NHS organisations across the UK have had to

plan, prepare and manage for a decrease in resources, and are likely to face further pressure in light of the plans for further spending cuts introduced by the new Government.

- 5.7 As a plan to secure future vital capital, the Annex site was initially marketed in 2007 and the Trust received unconditional offers to purchase. Values offered at that time were considerably higher than the current site valuation. Unfortunately the offers were withdrawn owing to uncertainty following attempts to list the building. Despite those requests being rejected by the Department for Culture Media and Sport (DCMS), the offers had been lost. The Trust has therefore decided to take the site forward itself to deliver a residential development that provides the best offer possible for Camden, its Community and local residents.
- 5.8 Despite the depression in the residential market, the Trust remains determined to fulfil its affordable housing obligations and proposes to maximise the offer made to Camden in times when others would seek to minimise their contribution, notably its strategy to provide over 50% by area of accommodation on site as affordable. It is noted that the percentage of affordable housing in similar schemes coming forward in Camden since January 2005 equates to an average of approximately 39%.
- 5.9 This is the absolute maximum level that the Trust is able to deliver without rendering the scheme unviable. The sale of the site has had to be sanctioned by the Strategic Health Authority which provides formal approval of the asset's potential contribution to the Trust's Financial Recovery Plan. From this, a minimum sales receipt has been agreed and the viability is benchmarked against this. The actual level of value generated by the current scheme just fulfils the minimum sales receipt and the Trust are reluctantly willing to proceed on this basis.

Policy synopsis

- 5.10 Planning Policy Statement 3 (Housing) provides the context for planning for housing. One of its objectives is to deliver 'a mix of housing, both market and affordable, particularly in terms of tenure and price, to support a wide variety of households in all areas, both urban and rural.'
- 5.11 Supplementary guidance to PPS 3, Government (Communities and Local Government) Policy Statement Delivering Affordable Housing (November 2006) outlines the affordable housing challenge that needs to be met, and provides information on how existing delivery mechanisms operate to help in delivery. Paragraph 19 states that Local Authorities should consider a number of issues when working on the delivery of affordable housing. One of these includes, '*The availability of both public and private investment in the delivery of affordable housing, and its impact on the viability of sites and the level of affordable housing targets (overall and specific) and thresholds. The targets should reflect the new definition of affordable housing and **an assessment of the likely economic viability** (PPS 3, paragraph 29).*' (our emphasis)
- 5.12 Policy 3A.10 of the London Plan, February 2008, is specific to negotiating affordable housing in individual private residential and mixed-use schemes. It states that, '*Boroughs should seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed-use schemes, having regard to their affordable housing targets adopted in line with Policy 3A.9, the need to encourage rather than restrain residential development and the individual circumstances of the site. **Targets should be applied flexibly, taking account of individual site costs, the availability of public subsidy and other scheme requirements***' (our emphasis)

On site provision of affordable housing

- 5.13 The scheme is to provide 142 units within a new building. In the context of the S106 Agreement, the first part of the obligation stipulates a minimum of 30 units (or 25%) of new development to be affordable housing, the second part a requirement for 14 units from the Odeon site.
- 5.14 Capacity studies have been undertaken and demolition of the existing building is required in order to deliver a minimum of 120 units to meet the first part of the obligation. Conversion of the existing buildings would generate 70 or less residential units in total and is not a feasible option.
- 5.15 The current scheme will deliver 51.2% affordable accommodation by floor area (GIA) and 48.8% private accommodation. This is split between 59.4% social rented and 40.6% intermediate. This is in line with GLA Draft Replacement Plan Policy and Camden's Core Strategy. In terms of the number of units, 70 units are affordable and 72 are private.
- 5.16 In terms of the provision in the context of the S106 Agreement, this includes 36 affordable units + a further 14 units (assuming an average unit size of 100 sqm). This amounts to a total of 50 units with a further 20 units provided in addition to this and in accordance with policy.
- 5.17 Both the planning permission for the new Hospital on Euston Road and for the Odeon site did not include proposals for residential or commercial development and the officer's report to Committee on 7th February 2002 noted, *'the applicants have given consideration to the fact the site is not to be developed for residential use, and, in recognition of the need for residential use in the area, the applicants have offered to provide an amount of off-site residential as affordable housing.'* The Officer continues to say, *'this affordable housing would be provided on one of the two sites previously identified. This provision of affordable housing is not a policy requirement of the development but is an offer from the applicants which officers consider should be accepted.'* It should therefore be noted that the provision was ex-gratia.
- 5.18 As the interpretation of the S106 and application of policy has been the subject of continuing debate, the Trust has sought legal opinion on this matter. Counsel has advised that the issue is about the proper exercise of the local planning authority's powers on any new development. Whilst there is nothing directly within the Agreement that prevents the LPA from double counting (including the S106 agreement and policy), Counsel advised that Camden would most likely be unable to succeed as:
- It is an implied term in the S106 that the affordable requirement for the Middlesex Hospital Annex should only total 25% or 30 units plus the Odeon requirement.
 - In terms of consideration the officer's reports make it clear that it was not the intention of the Council to double count the affordable requirement
 - The Odeon site requirement was ex-gratia and outside of policy.
- 5.19 Camden has also expressed they believe that the S106 legacy requests all affordable housing provision as social rented tenure. In the current scheme this would equate to 50 of the 70 affordable units being put forward as social rented tenure which would mean a split of 71% social rented to 29% Intermediate. Not only would this be contrary to policy but would also be against advice from our chosen RSL partner Origin Housing and Camden's housing officer.

- 5.20 The proposals have been formulated following discussions with our chosen RSL partner and Camden's housing officer to ensure that the most appropriate mix is provided to meet housing needs, management and integration of the units within the site. The affordable floor area is deemed to be the maximum possible affordable commitment that can be generated on this site.
- 5.21 In assessing the scheme against potential other uses, which are conducive to the Central London Area, it was noted that an alternative development such as a mixed-use scheme for offices and a private medical facility could generate a higher site value than that expected from the receipt from this site.
- 5.22 Furthermore, in addition, to the financial constraints imposed by the affordable housing requirement, the value of the site has been significantly pushed downwards by a number of other constraints including:
- Overall height of the building has been restricted to ground plus 9 storeys
 - Housing advice to date has stated that shared ownership tenure in this location is unviable due to caps on affordability – this has meant no other option than to ensure that an adequate level of intermediate tenure accommodation is provided. A more viable option would be to progress a straight 50:50 split in tenure.
 - Level of car parking has been restricted despite the fact a basement area already exists and that the basement car parking area would exit onto a City of Westminster Street. Use of the existing basement for car parking represents the most cost effective and valuable use of the basement area and provides a degree of value enhancement supporting the viability case in the provision of affordable housing.
 - Private values of several areas/ levels are lower than might otherwise be expected due to the close proximity of such a large amount of affordable housing.
 - Similarly, insistence on large numbers of larger affordable units at a time when the structure of affordable housing grant provision has changed from per person provision to per unit provision has further eroded value.
- 5.23 The Trust and the SHA are aware that the open market value of a number of residential led sites of a similar nature and of circa 0.75 acre to 1 acre in Central London are in the region of £25m to £30m, in line with bids received for this site during the previous marketing exercise. These include examples during 2006 -2010 and are set out below:
- National Temperance Hospital, Euston, 0.9 acre, £28m, 2006;
 - Ham Yard, Soho, 0.75 acres, £27m, 2009; and
 - In respect of the current market – we understand that Camden Town Hall Annex (0.57acres) is currently under offer at a price in the region of £25m.

- 5.24 The anticipated value is near half these values and bordering making the scheme unviable.

Conclusion

- 5.25 The Trust is keen to develop the vacant Annex site which currently presents a run-down appearance at this location with the prominent hoardings. The proposed scheme will deliver 70 much needed affordable housing

units to a high standard, south of Euston Road, providing a range of tenures in accordance with LBC's requirements and optimising the use of a previously under-used site.

- 5.26 In the constraints of the current market, it ensures delivery of the affordable housing units required under the S106 legacy and also provides a level of affordable housing in accordance with LBC's planning policy requirements. This presents the minimum level of viability possible for the scheme to progress, but can be achieved. This scheme is progressing at a time when a number of developers are re-working previous S106 agreements to revise contributions downwards in light of viability constraints. The Trust are not doing this.
- 5.27 The level of site value estimated is the absolute minimum for the Trust to proceed, is significantly constrained and notably less than former offers.

6 Justification for Planning Permission

- 6.1 The applicant seeks full planning permission and conservation area consent to demolish the existing building to provide a new residential led development providing 142 units.
- 6.2 It is considered that the key issues when determining this case are as follows:
- a) the proposed land use
 - b) the principle of demolition
 - c) the provision of affordable housing
 - d) the merits of the new development
 - e) the proposed density
 - f) other technical considerations
- a) **the proposed land use**
- 6.3 The Middlesex Hospital Annex site is allocated within Camden's adopted UDP as a land use proposal site under Policy LU1, advising that it should be used for mixed uses, primarily residential led. Camden's emerging Site Allocations document (Site 21) within its LDF carries this forward, aiming to secure a residential led development on the site.
- 6.4 The change of use from medical to residential is therefore compliant in policy terms. It brings forward a new land use which is the Council's priority land use whilst incorporating an element of mixed uses also at ground floor, congruent with the Central London Area. It will help to meet borough housing targets and deliver much needed housing whilst introducing commercial or retail type uses at ground floor creating active frontage and making the area more vibrant. The location of the commercial/ retail units is the best location as this is the primary frontage to the site. These units are also of a size suitable to ensure they are let at a future date for use classes A1, A2 or B1. A letter from Savills, acting as agents, is included at **Appendix 2** which confirms this.
- 6.5 The Middlesex Hospital Annex site was last occupied for medical purposes in 2006 and at present is a vacant under-used site which is having a negative affect on its immediate and wider setting. It does not present a site which sits well within the Conservation Area in its current form and is viewed as an eye-sore, exacerbated by the hoarding which surrounds the site.
- 6.6 The site however offers an excellent opportunity for redevelopment and to secure an optimum scheme in terms of planning policy which will regenerate the area and deliver a number of other benefits. It benefits from a highly accessible location with good transport links and is a central location which supports higher density development.
- 6.7 The provision of 142 units at 1298 habitable rooms per hectare maximises the potential of the site in accordance with London Plan Policy 3A.3 and provides a density which is compatible with local context, design and public transport.
- 6.8 The site is important to the UCLH NHS Trust's long – term plans and to ensure that it delivers revenue to the Trust which will enable it to meet its requirements in providing further and improved medical services.

Whilst there is a loss of D1 use on the site, this is to be provided elsewhere in Phase 2 of the new Hospital redevelopment.

b) the principle of demolition

- 6.9 The building lies within the Charlotte Street Conservation Area, however it is not noted as a positive contributor in the Charlotte Street Conservation Area Appraisal.
- 6.10 Whilst the Annex building was constructed in the 1880s it has been heavily altered meaning that little historic fabric remains. It is not viewed as a building of any remarkable quality and despite previous attempts by English Heritage and the Georgian Society to list the building, these were rejected in 2008 by the Department of Culture, Media and Sport (DCMS). The reasoning for rejection re-affirmed that there is little remaining historic fabric and that its historic use as a Workhouse does not warrant its listing.
- 6.11 As highlighted previously and explained in detail in the Affordable Housing Viability Report, there is a historic legacy that requires the Middlesex Hospital Annex site to provide 25% or a minimum of 30 units, social rented tenure, on site.
- 6.12 To achieve this minimum provision of 30 units (25%), a scheme would therefore be required to deliver a minimum of 120 units.
- 6.13 Capacity studies have been undertaken and these confirm that the current 4 storey building would only be able to deliver 70 units if it were to be converted. Demolition of the existing building is essential to achieve a viable scheme on site.
- 6.14 The new scheme will replace the current dilapidated building with a high quality development, carefully designed to sit well in its location and positively contribute to the setting of the Conservation Area. The design is of a contemporary nature but fully respects the context and scale of its surroundings. Furthermore, the set backs at higher levels and varying heights across the scheme respect the scale of neighbouring properties.
- 6.15 As the scheme is to be built close to the edge of the plot boundary on Cleveland Street, it will help to recreate the street edge that is currently weakened by the location of the Windeyer building to the north.
- 6.16 The current building represents under use of the site and detracts from the spirit of the Conservation Area. Demolition of the existing building and redevelopment presents the best opportunity for the site in the context of planning policy.

c) the provision of affordable housing

- 6.17 The scheme will deliver a high amount of affordable housing south of Euston Road exceeding the level required by policy in floorspace terms. A Viability justification is provided by Savills which confirms that this level is financially feasible but any further increases cannot be sustained. It proposes 51.2% GIA as affordable housing and 48.8% as private housing. This is a significant provision in light of a large number of schemes in the current market and recent years being unable to deliver a 50% floorspace target as affordable housing.
- 6.18 It is proposed that the tenure of affordable housing will be split 59.1% as social rented and 40.9% as intermediate. This is in line with Camden's aspirations in its emerging policy CS6 of its Core Strategy and the objectives of the draft London Plan Policy 3.12.

- 6.19 In terms of the number of units, the provision equates to 70 affordable units and 72 private units with a range of unit sizes accounting for family needs in the provision of 3 bed and 3 bed + units. This mix is considered to be the most suitable mix following discussions with Camden's housing officer (Mike Cox) and a preferred RSL partner, Origin Housing.
- 6.20 The affordable units are located within 2 separate cores from the private housing which is seen as key to ensuring effective management of the units and follows advice from Origin Housing.
- 6.21 In relation to the historic S106 Agreement, there is a requirement for 25% (or a minimum of 30 units) of new housing on the site to be affordable, social rented housing. This scheme provides 25% of total provision which equates to 36 units. In addition to this, the Odeon site required a further 1425 sqm (14 units) on implementation of the planning permission and was initially required as housing was proposed for the Odeon site. This is a land use which triggers a requirement for affordable housing. Whilst Camden Council has stated they do not believe the Odeon planning permission has been implemented, nor is the Odeon site to be used for residential development, this scheme includes a further 14 units of affordable housing and an additional 20 units to maximise the offer of affordable housing possible to Camden. This is the maximum possible to ensure the scheme still remains viable and fully meets policy expectations and S106 requirements.

d) the merits of the new development

Design

- 6.22 The scheme is to deliver a contemporary, high quality design which will assimilate effectively with its neighbouring buildings and into the wider context of the conservation area. It is of varying heights with the tallest element situated away from Cleveland Street to reduce impact on neighbouring buildings.
- 6.23 The separation of units between 4 cores will ensure more efficient management of the building and the overall height of the building will not compromise strategic views. Full account of the draft London View Management Framework has been taken into consideration and the scheme has been designed to comply with this.
- 6.24 The central courtyard will provide a focal point enabling views through from Cleveland Street. The scheme presents well designed spaces, high quality landscaping, sustainable, safe and accessible development.
- 6.25 In the context of Camden's supplementary planning guidance, the proposed units will exceed minimum areas for new floorspace and bedroom sizes. The introduction of mixed uses at ground floor will create active frontage along Cleveland Street and help to create a more vibrant area along this section of Cleveland Street.
- 6.26 The building has been designed to provide a good level of amenity space/ playspace with the central courtyard and use of available rooftop space.
- 6.27 The design evolution has been on-going with frequent discussions taking place between the Architect and Camden's conservation and design officer. The fine detail is likely to be dealt with via conditions attached to the planning permission to ensure that the optimum design solution is achieved.

New housing

- 6.28 The scheme is to deliver a high quantum of new housing, not only fulfilling historic legacy requirements linked to the site but also meeting policy requirements. This will help to meet Camden's housing needs and will deliver a choice in terms of mix meeting 10% wheelchair accessibility and providing housing built to lifetime homes standards.

Sustainability

- 6.29 The development will be highly sustainable meeting code level 4 for sustainable homes and ensuring that CO₂ emissions are reduced to the minimum level possible.

Planning obligations

- 6.30 It is envisaged that a number of benefits will be delivered in the form of both capital and non-capital contributions. These include:

Non capital contributions:

- Training and employment clauses
- Pre-code for sustainable homes
- Energy Statement commitments
- Sustainability Statement commitments
- Post construction review prior to occupation
- Operation of open space
- Green Travel Plan
- Cycle Parking
- Disabled parking provision
- Construction and Service Management Plans

Capital contributions:

- Funding to increase the capacity of local school places
- Possible Open space provision
- Highways works immediately surrounding the site
- Pedestrian, cycle and environmental improvements in wider area including 'Legible London'; and
- Community Facilities

Potential investment

- 6.31 Other benefits include facilitating the creation of a new pedestrian route through the site linking Cleveland Street to Charlotte Street and the wider investment to the area created by not only the financial contributions via the S106 agreement but the physical job creation to the construction industry.

e) the proposed density

- 6.32 The development proposes 396 habitable rooms which equates to 1298 habitable rooms/ hectare or 465 units/ hectare. In central locations with a PTAL rating of 4-6, the London Plan density matrix (Table 3A.2) suggests a range up to 1100 habitable rooms/ hectare or 405 units/ hectare.

6.33 Policy SD4 of Camden's UDP states that the Council will grant planning permission for development that makes full use of a site's potential. High density development is expected at locations in the Central London Area. Density is expected to conform wherever possible to the density ranges set out in the London Plan.

6.34 The proposed density broadly reflects the London Plan density matrix. Whilst the development proposes a slightly higher level, it is considered that the site will effectively accommodate the proposed density and the design further supports this.

f) Other technical considerations

Transport

6.35 Whilst Camden seeks to encourage car free or car capped development, this scheme provides a limited number of car parking spaces below the suggested ratio in both Camden and the GLA's guidance. All spaces are to include electric vehicle charging points. 14 spaces are to be disabled spaces, 2 to be allocated as car club spaces and 11 as electric vehicle only charging points.

Daylight/ Sunlight

6.36 The scheme has been assessed using all 3 methods of analysis (1: vertical sky component, 2: average daylight factor and 3: No sky). The scheme has been refined during the design evolution to ensure compliance with daylight/ sunlight BRE guidelines. Whilst it is noted that 4 neighbouring rooms to the development will experience negative effect when assessed against all 3 methods of analysis, the scheme overall generally meets compliance in terms of sunlight analysis to all relevant overlooking rooms/ windows and meets the shadow assessment in and around the development.

Flood Risk

6.37 The Flood Risk Assessment has confirmed that the development is in Flood Zone 1 where the probability of flooding is less than 0.1% (1 in 1000 year event). The proposal is therefore fully compliant with the sequential approach principles in PPS25, which steers development to low risk areas. The development is not considered to be at risk of flooding and does not increase the risk of flooding of surrounding areas.

Energy/ Sustainability

6.38 Robust Energy and Sustainability Statements have been put forward which aim to achieve a minimum 44% reduction in CO₂ emissions from 2006 with a 10% contribution to site energy via renewable technology. A range of measures are proposed to ensure code for sustainable homes level 4 will be met.

Air Quality and Noise

6.39 An impact on air quality has been identified which will be carefully assessed. The main sources of noise have been identified as originating from Cleveland Street and to a lesser extent from Charlotte Street. Mitigation measures will ensure 'good' internal noise levels for residential use are achieved.

Open Space

6.40 The scheme will provide a total of 2,308 sq m of open space via shared and private amenity space. UDP Policy N4 requires 9 sq m of open space to be provided per person. Based on the number of bed spaces, the scheme

delivers a level higher than that requested by policy. The provision of 60 x 1bed, 64 x 2 bed and 18 x 3 bed units equates to 242 bed spaces. This would require a total amount of 2,178 sq m of open space.

Privacy

- 6.41 The scheme has been designed taking into account Camden's supplementary planning guidance, particularly 'Overlooking and Privacy'. The distance between windows directly facing each other in all cases is greater than 18m within the site and to Astor College to the east.

7 Conclusions

- 7.1 The proposals will deliver a high quality development providing much needed housing south of Euston Road. In addition to providing a range of private units, the proposed residential units will deliver over 50% affordable housing by floorspace. This meets the historic S106 legacy requirements for the site and contributes significantly to the Council's planning policy requirements.
- 7.2 The site is identified for redevelopment by the Council and there is a desire to remove the existing dilapidated building. This development will provide a building which sits well with its neighbours and surroundings, and which also positively contributes to the Conservation Area.
- 7.3 It provides an element of mixed uses with commercial/retail opportunities at ground floor. These will help to create active frontage at this location along Cleveland Street.
- 7.4 The development will also open up the site by creating views through from Cleveland Street to the courtyard with high quality landscaping and open space, delivering open space beyond the level required by Camden's UDP Policy N4.
- 7.5 The development will meet code level 4 for sustainable homes and fully addresses other technical considerations within the detailed Consultant's reports which accompany this application.
- 7.6 The development subject of this application has been formulated as a result of on-going discussions with Camden Council and community feedback. This has led to a number of design revisions to reach the most suitable scheme.
- 7.7 The scheme is planning policy compliant, notably complying with policies H1 and H2 to deliver new housing and affordable housing. We therefore respectfully request that it is granted planning permission to enable development to come forward.

Appendix 1 – Site Location Plan

Appendix 2 – Letter from Savills supporting proposed street level use categories



Real value in a changing world

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