

<b>Address:</b>	<b>Grand Union House 16-20 Kentish Town Road London NW1 8NH</b>		<b>2</b>
<b>Application Number(s):</b>	2021/0911/P	<b>Officer: Sofie Fieldsend</b>	
<b>Ward:</b>	Camden Town with Primrose Hill		
<b>Date Received:</b>	<b>26/02/2021</b>		

**Proposal: Partial demolition and redevelopment of the existing building and upward extension to provide offices on the upper floors (Class Eg) and commercial floorspace at ground floor (Class E a, b and c) and six residential units (3x 2-bed and 3x1-bed), alterations to landscaping.**

**Background Papers, Supporting Documents and Drawing Numbers:**

Existing Plans:  
0004 Rev.P1; 0005 Rev.P1; 0100 Rev.P1; 0101 Rev.P1; 0102 Rev.P1; 0200 Rev.P1; 0300 Rev.P1 and 0310 Rev.P1.

Proposed Plans:  
1005 Rev.P2; 1100 Rev.P2; 1101 Rev.P1; 1102 Rev.P1; 1103 Rev.P1; 1180 Rev.P1; 1181 Rev.P2; 1182 Rev.P2; 1183 Rev.P1;  
1210 Rev.P1; 1220 Rev.P2; 1230 Rev.P2; 1240 Rev.P2; 1270 Rev.P1; 1300 Rev.P1; 1310 Rev.P1; 1380 Rev.P1;2010 Rev.P1;

DR\_P0032\_PL\_101 Rev A; DR\_P0032\_PL\_102 Rev.C; DR\_P0032\_PL\_103 Rev.B; DR\_P0032\_PL\_111 Rev.C; DR\_P0032\_PL\_211 Rev A; DR\_P0032\_PL\_212 Rev B; DR\_P0032\_PL\_121 Rev.C; DR\_P0032\_PL\_131 Rev.C; DR\_P0032\_PL\_141 Rev A; DR\_P0032\_PL\_142 Rev.B; DR\_P0032\_SC\_201 Rev.C; DR\_P0032\_SC\_202 Rev.C; DR\_P0032\_SC\_203 Rev.C; DR\_P0032\_SC\_204 Rev.C;

Supporting documents:  
Acoustic report by WSP dated Feb 2021;  
Affordable Workspace Proposal;  
Affordable Workspace Overview dated Nov 2021;  
Air Quality Assessment by WSP dated Feb 2021;  
Air Quality proforma;  
Arboricultural report by WSP dated Feb 2021;  
BREEAM Pre-assessment report by WSP dated Feb 2021;  
Consolidated 2<sup>nd</sup> addendum by BPS dated 6/12/21

Cover letter by RPS dated 23/9/21;  
Construction Management Plan proforma dated 16.2.21;  
Design Statement by 6a Architects dated Feb 2021;  
Daylight & Sunlight Report by Point 2 Surveyors dated Feb 2021;  
Letter from by Point 2 Surveyors dated 19/2/21;  
Employment, Skills and Supply Plan  
Energy Statement by WSP dated Feb 2021;

Financial Viability Assessment Report by Savills dated Nov 2021;  
 Fire Strategy Report by WSP dated Oct 2021;  
 Flood Risk Assessment & Outline Drainage Strategy by WSP dated Feb 2021;  
 Sustainability: Flooding & SUDS Letter from by WSP dated 3/9/2021;  
 Heritage Statement by Bridges Associates dated Feb 2021;  
 Landscaping Statement update by Djao-Rakine dated Sept 2021;  
 Regeneration Statement by Quod dated Feb 2021;  
 Structural Stage 2 Report by WSP dated Feb 2021;  
 Sustainability Statement by WSP dated Feb 2021;  
 Statement of Community Involvement by Four Communications dated Feb 2021;  
 Townscape and Visual Assessment by Bridges Associates dated March 2021;  
 Transport Assessment by WSP dated Feb 2021;  
 Transport Assessment Addendum by WSP dated Sept 2021;  
 Travel Plan by WSP dated Feb 2021;  
 Waste Management by WSP dated Feb 2021 and  
 Delivery and Servicing Plan by WSP dated Feb 2021

**Recommendation Summary: Grant conditional planning permission subject to a Section 106 legal agreement.**

**Applicant:**

Camden Mixed Developments Limited  
 42-44 Bermondsey Street  
 London,  
 SE1 3UD

**Agent:**

RPS Group  
 20 Farringdon Street  
 London  
 EC4A 4AB

**Analysis Information**

Land use details				
Use Class	Description	Existing GIA (sqm)	Proposed GIA (sqm)	Difference GIA (sqm)
E	Offices	2,651	6,657	+ 4,006
E	Existing use as a gym	214	0	-214
E	Proposed use as class E (a, b and c)- High street uses	0	251	+251 (+37 class E)
Sui Generis	Drinking establishment	230	0	- 230
C3	Dwellings (flats)	0	523	+ 523
	<b>Total</b>	<b>3,095</b>	<b>7,431</b>	<b>+ 4,336</b>

<b>Residential Use Details (Proposed):</b>						
	Residential Type	No. of Bedrooms per Unit				
		1	2	3	4	<b>Total</b>
Camden Intermediate Rent	Flat	3	3	0	0	<b>6</b>
	House	0	0	0	0	<b>0</b>
	<b>TOTAL</b>	<b>3</b>	<b>3</b>	<b>0</b>	<b>0</b>	<b>6</b>

<b>Parking details</b>			
Car Type (ground floor car park)	Existing spaces	Proposed spaces	Difference
Car - General	33	0	- 33
Car - Disabled accessible	0	0	0
Cycle Type	Existing spaces	Proposed spaces	Difference
Cycle – residential long stay	0	12	+12
Cycle – commercial long stay	0	114	+114
Cycle – short stay (total)	0	37	+37

## Officers' Report

**Reason for Referral to Committee: Major development involving the construction of more than 10 new dwellings or more than 1000 sq. metres of non-residential floorspace [clause 3(i)].**

## Executive Summary

- i. The site comprises Grand Union House and 16 Kentish Town Road which front Kentish Town Road, to the rear of the site is Sainsbury's supermarket. The application site is not listed, but is in two conservation areas (CAs); 16 Kentish Town Road is in Camden Town Conservation Area and Grand Union House (GUH) is in Regent's Canal Conservation Area. The nearest Listed Buildings are Sainsbury's Supermarket and Grand Union Walk which were also designed by the same architect and built at the same time. Both are Grade II Listed Buildings. South of the site is the Grade II\* Listed St Michael's Church.
- ii. The proposals would result in the partial loss of Grand Union House and the complete demolition of the single storey building at 16 Kentish Town Road; however, these contribute little to the street scene or townscape. Grand Union House's existing elevation at ground floor on Kentish Town Road appears unattractive with its gated car park and anti-climb measures which detract from the street scene and conservation area. The proposed replacement buildings reuse the foundations and ground floor superstructure. They respond to the scale and language of the surrounding area and provide a high standard of design and finish, enhancing the setting and character of several heritage assets. No harm has been identified to any other heritage assets.
- iii. The comprehensive redevelopment has provided an opportunity to design a building that has a better relationship to Kentish Town Road with an active frontage at ground level. This will positively affect its character and provide increased surveillance of the street which suffers with anti-social behaviour and criminal activity.
- iv. The proposed development would provide increased commercial and employment floorspace, with affordable workspace and end users and operators for both. The scheme would also provide six new homes. Housing provided would provide a good standard of living accommodation and all units are proposed as affordable housing.
- v. In conclusion, the proposal would preserve and enhance designated heritage assets and no harm has been identified. Although there would be limited impacts on neighbouring amenity, the benefits of the scheme would be significant enough to outweigh these matters. There are several public benefits of the scheme that could outweigh any identified harm:
  - Additional employment floorspace including 5% affordable workspace.
  - Creation of 6 new affordable residential units at the site.

- A review mechanism for a potential deferred affordable housing contribution of up to £2,467,500 to contribute towards affordable housing.
- Creation of an active frontage and designed to combat existing anti-social behaviour by infilling the under-croft car park
- Removal of car parking
- High quality architecture with excellent sustainability and biodiversity benefits.
- Significant contributions towards the provision of local infrastructure and facilities are proposed through CIL, financial contributions in the S106.

## 1 Site

- 1.1 The application site covers an area of approximately 0.19 hectares (1900 sqm). The site comprises two buildings fronting Kentish Town Road, Grand Union House and No.16 Kentish Town Road.
- 1.2 The site is located to the eastern side of Kentish Town Road. To the east of the site is a Sainsbury's supermarket and associated servicing yard. Moving south of this is the Grade II Listed St Michael's Church neighboured by a Welfare Centre for the charity Mind, and Barnes House, a residential block of flats. Directly south of the application site is a vacant site with a terrace of commercial and residential beyond this. To the north of the site is the vehicular access to Sainsburys with residential units beyond this, both the Sainsbury's and the residential units (Grand Union Walk) are Grade II listed. To the opposite side of Kentish Town Road are a mixture of uses including a church, residential and some commercial.
- 1.3 Grand Union House is a 4-storey building. The undercroft, covering the vast majority of the ground floor footprint, is partly used as a private car park and is gated, it also provides a vehicle exit for servicing vehicles of Sainsbury's supermarket to the rear, and also a pedestrian route through which leads into Sainsbury's and onto Camden Road. Sainsbury's servicing will be accommodated within their existing site. No.16 Kentish Town Road is a single storey building which was in use as a gym (Class E).



Figure 1 – Existing aerial view looking south

- 1.4 The majority of the site is located within the Regent's Canal Conservation Area, No.16 Kentish Town Road is within the Camden Town Conservation Area. To the rear of the site is the Grade II listed St Michael's Church. In 2019 the neighbouring properties at Grand Union Walk and the Sainsburys supermarket were designated as Grade II listed. Along with these two buildings, Grand Union House was part of a group of buildings designed in the High-Tech style by Nicolas Grimshaw. Grand Union House was explicitly excluded from the listing. The site is noted as a positive contributor to the Conservation Area within the Map that is appended to the Conservation Area Statement, however it is not listed within the Conservation Area Statement as a positive contributor. Officers consider it to be of neutral contribution overall because although it has a very poor ground floor environment, it still maintains a visual and historical link with the Grimshaw buildings. The site is also located within the designated Camden Town, Town Centre.
- 1.5 The site has the following planning policy designations:
- Regent's Canal Conservation Area
  - Camden Town Conservation Area
  - Camden Town Town Centre
- 1.6 The site is located on Kentish Town Road (A400) which forms part of the Strategic Road Network (SRN). SRN roads are near the top of the borough's road hierarchy, second only to the Transport for London Road Network (TLRN) roads, for which TfL is the Highway Authority. Kentish Town Road has northbound one-way working next to the site.
- 1.7 The site has a PTAL rating of 6b, which is considered to be the best level of public transport accessibility. Various transport interchanges are located within a 5-minute walk of the site, including Camden Town station (Northern Line) and Camden Road station (London Overground). In addition, bus stops serving various routes are located nearby on Kentish Town Road, Bayham Street, Camden High Street, Camden Road and Camden Street.

### Background

- 1.8 The Grand Union campus was formerly a production site for the ABC (Aerated Bread Company) Bakery. The ABC building was constructed on the site of Grand Union House in 1939, and became the main production building for the bakery. It stretched along Kentish Town Road, not unlike the existing Grand Union House building today. Its façade, with Art-Deco signage and horizontal fenestration, stood apart from the surrounding Victorian terraces and warehouses. It was exceptional in its scale, length and composition, quite different to the finer grain of its surroundings, and it established a linearity which Grimshaw's building on the site would go on to share.
- 1.9 The site was used as a bakery until the late 1970s; the buildings were demolished in the 1980s to make way for the Sainsbury's development, and the bakery's foundations were reused in the construction of Grand Union House.



Grimshaw's redevelopment scheme was completed in 1988 in the 'High-Tech' architectural style.

## 2 The Proposal

- 2.1 The proposal is for the partial demolition, and re-use and redevelopment of Grand Union House with an upward extension to provide office across all floors and flexible commercial floorspace at ground floor (Class E) within a six-storey building. The single storey building at No. 16 Kentish Town Road will be entirely demolished and six residential units within a four storey building will be erected in its place. The six residential units would comprise of 3x 2Beds and 3x1Beds. Alterations to landscaping in and around the under-croft area, and installation of cycle parking on surrounding public realm are proposed.
- 2.2 The proposals include use of part of the ground floor office reception as a publicly accessible café/retail space; creation of an internal glasshouse at 1<sup>st</sup> – 3<sup>rd</sup> floor; roof terraces at levels three and four; introduction of new green roofs; installation of a plant room at 4<sup>th</sup> floor; and provision of cycle parking for all uses and associated end of trip facilities.



*Figure 2 – The proposed building*

### Revisions



2.3 In response to comments received from officers, revised drawings were submitted incorporating the following amendments:

- Public realm alterations to Kentish Town Road revised to keep existing on-street parking bays and the pavement planting is now shown as indicative only and would not be secured by this permission
- Inclusion of 5% of the total office floorspace as affordable workspace (333sqm) at 1<sup>st</sup> floor
- Floorplans of the 3x2bed flats were updated to remove the lobby between the bedrooms to improve its layout and flow.

### **3 Relevant history**

#### The site

- 3.1 **2018/6092/P** - Partial demolition and redevelopment of the existing building, to provide a new office (Class B1) building with associated roof terraces, ground floor flexible uses (Class A1 /A3/ D2), and 6 flats (1 x studio, 2 x 1 bed and 3 x 2 bed), along with associated landscaping works. **Withdrawn**
- 3.2 The application was withdrawn after two of the neighbouring Grimshaw buildings were listed (Sainsburys Supermarket and Grand Canal Walk). Officers felt that the design approach should be revisited and be more sensitive to the newly listed buildings.

### **4 Consultation Summary**

#### Statutory

#### **4.1 Transport for London (TfL) – Spatial Planning**

##### **Trip generation**

- A Transport Assessment (TA) has been provided for this proposed development, setting out the potential impacts this development may have on the local transport network. The TA demonstrates an additional 95 AM and 92 PM public transport trips will be generated by the proposed development.

##### **Active Travel Zone**

- An Active Travel Zone (ATZ) has been undertaken. The six active travel routes assessed are acceptable and appropriate. The assessment identifies improvements that could be made to the pedestrian conditions on the route towards Kentish Town Station. The applicant could work with Camden Council to help deliver these improvements to improve the walking environment in the vicinity of the site.

##### **Cycle parking**

- Cycle parking will be provided in line with the minimum standards set out in policy T5 (Cycling) which is welcomed. All cycle parking should be designed and laid out in accordance with the London Cycling Design Standards

(LCDS), with 5% of the total provision catering for larger cycles, including adapted cycles for disabled people.

- It is noted part of the cycle parking will be provided in the form of two-tier racks. Where two-tier racks are provided, they should have a mechanically or pneumatically assisted system for accessing the upper level and the product must also allow for double locking. Minimum aisle widths, as set out in LCDS and recommended by manufacturers, must be met for these stands to be usable.
- Access to cycle parking within the buildings should be as simple and legible as possible. Users should have to negotiate a maximum of two doors to gain access to the cycle parking area. Push-button controls to assist with door opening are highly recommended.
- It is understood short stay cycle parking will be in the public realm. While this appears acceptable in principle, the applicant should take account of footfall with the cycle parking in place on the footway.
- The retail and office uses will be accommodated with cycling welfare facilities such as showers and lockers, which is strongly supported by TfL.

### **Car parking**

- The development will be car free, which is supported by TfL given the sites excellent PTAL rating. However, TfL notes 3 general car parking spaces are to be retained on Kentish Town Road. It is unclear if these bays are within the red line boundary. If so, they should be removed as the retention of car parking spaces would not result in a car free development.
- One blue badge bay will be provided on Kentish Town Road. The distance between the associated building entrance and this bay should be minimal and be easily accessible on firm and level ground.

### **Travel Plan**

- A Framework Travel Plan has been provided in line with Policy T4 (Assessing and mitigating transport impacts) of the London Plan. The targets are set over 5 years, with interim targets and surveys which is welcomed. TfL is supportive of the Plan's aim to promote sustainable transport modes

### **Public realm**

- As part of the s278 agreement, the council and developer should consult TfL buses when undertaking highway works.
- The proposed public realm works should be developed in accordance with TfL's guidance in terms of Healthy Street outcomes. Any tree planting should be thought about sustainability and not just in the short term and should also consider the maintenance of these trees.

### **Delivery and servicing**

- A Delivery and Servicing Plan (DSP) has been submitted, this should be secured by condition.
- It is understood refuse collection currently takes place on Kentish Town Road, and it is anticipated that this arrangement will remain. This appears acceptable in principle.

- All servicing will take place on-street for all uses. Providing this is does not obstruct the operation of buses on Kentish Town Road, the thoughts of Camden as highway authority should be sought on this arrangement.
- Office and commercial deliveries will be consolidated where viable, a delivery booking system will be employed, and occupiers will be encouraged to utilise operators registered with FORS. This is all strongly welcomed by TfL. The booking system should operate to ensure deliveries occur outside of peak highway hours where possible.
- The applicant should consider the provision of cargo cycle spaces, to encourage a mode shift to a more sustainable delivery method.

### **Construction**

- A Construction Management Plan (CMP) has been provided, this should be secured by condition in line with TfL guidance.
- The operation of buses on Kentish Town Road should be protected during construction and operation of the development. The applicant should confirm that the development would not impact the operation of buses, including bus route and journey times in any way on during construction and operation.
- During construction, safe routes for walking and cycling, which are fully accessible for people of all ages and abilities, should always be provided.
- Swept path analysis should be provided, demonstrating how construction vehicles will access and egress the site in a forward gear.
- All deliveries will be undertaken by FORS silver or above operators, and banksmen will be employed, which is welcomed.
- Construction deliveries should be consolidated where possible, and holding areas used to avoid congestion on the surrounding highway network.
- TfL should be informed of the start of finish dates of construction and made aware of any changes to this timeline.

### **Underground**

- The site is situated close to underground tunnels and infrastructure. TfL believe London Underground Infrastructure Protection have been consulted, and their comments should also be taken into consideration.

**Update:** Following revisions TfL are now satisfied with the application and support the scheme as the previous comments have been addressed.

## **4.2 TfL London Underground Infrastructure Protection**

- Though we have no objection in principle to the above planning application there are a number of potential constraints on the redevelopment of a site situated close to underground tunnels and infrastructure. Therefore, we request the following condition should be attached:

*“The development hereby permitted shall not be commenced until detailed design and method statements (in consultation with London Underground) for all of the foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and*

*permanent), have been submitted to and approved in writing by the local planning authority which:*

- provide demolition and foundation details on all structures*
- accommodate the location of the existing London Underground structures and tunnels-provide Impact Assessment*
- and mitigate the effects of noise and vibration arising from the adjoining operations within the structures and tunnels.*

*The development shall thereafter be carried out in all respects in accordance with the approved design and method statements, and all structures and works comprised within the development hereby permitted which are required by the approved design statements in order to procure the matters mentioned in paragraphs of this condition shall be completed, in their entirety, before any part of the building hereby permitted is occupied.*

*Reason: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with London Plan 2015 Table 6.1, draft London Plan policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012"*

- *Officer's response: This condition would be included should planning permission be granted (see Condition 4).*

#### **Local groups/stakeholders**

#### **4.3 Camden Town CAAC objection, summarised below:**

- The Committee wishes to reiterate and support the comments made in the letter of objection from the Twentieth Century Society (dated 12.02.21), noting the importance of the first and second floor elevation to Grand Union House and the value of the nursery building which adjusts the scale of the building as it meets the earlier buildings on Kentish Town Road and provides a gap for the housing on Camden Road to benefit from.
- Support the infill at ground floor to activate the street frontage and see no harm in adding two storeys set slightly back above the existing facade in a well resolved way to financially justify the development.

#### **Design/Scale/heritage:**

- Bulkier than withdrawn scheme with an aggressive roofline with no rationale.
- Bulk does not respect newly listed adjacent buildings.
- The recent listing of the Grimshaw designed Sainsburys and Grand Union Walk presumably includes the original entrance portal to the central car park, which appears to be retained in the CGIs of the proposed scheme. This entry portal 'borrows' symmetrical stair tower elements on concrete and curved cladding panels, one of which serves the newly listed canalside dwellings, the other serving Grand Union House. The current scheme removes the Grand Union House stair tower element, replacing it with a taller simulacrum, however this element is arguably part of the listed structure as it completes the entry portal. The current proposals fail to take

this into account by not accurately evaluating the real boundaries of significance or listing.

- Roof garden appears both enclosed by the facade and open depending on the CGI, so it is unclear how this element may or may not be perceived from the street.
- Frontage needs more activation along Kentish Town Road.
- Facade treatment - appears to be based closely on Lacaton and Vassal's Architecture School in Nantes (building that opens up directly to views across the adjacent river Loire), not Kentish Town Road. In our view to replace a facade by one of Britain's most distinguished architects the rationale needs to be a more robust.

#### Sustainability:

- Concerns that opening of the facade for natural ventilation will be hindered by traffic noise and not used.
- Materials selected (glass and aluminium) have some of the highest embodied carbon materials in construction, with aluminium requiring ten times the amount of energy to manufacture extrusions than the equivalent weight of steel. Glass generates 8.39 tonnes of CO2 per tonne of glass, with the multiple coatings referred to adding significantly to the energy and processing of this material, completely overwhelming the claim of carbon savings noted in the Design Statement when referencing the use of cross laminated timber decking. The re-use of the existing aluminium panels and glazing systems together with the concrete frame is a far more effective low carbon strategy to adopt.

#### **4.4 TRACT objection, summarised below:**

##### Height and Massing

- Height seems excessive and oppressive from street level. Top floor adds excessive height and massing.

##### Townscape, Heritage Assets and Visual Impact

- The roofline is not in keeping with the buildings surrounding the site. It negatively impacts the view of the listed St Michaels Church from Buck St and Stuckley Place.
- Building height, including the escape stair to the canal side, negatively impact The Elephant House when viewed from the Regent's Canal towpath and Kentish Town bridge.
- The façade design fails to capture a building in use, it will appear a visual mess. Advise obscuring the glazing into the office space between finished floor level and desk top c.750mm.
- To maintain quality materials, these should be conditioned

##### Public Realm and ASB

- Concerns existing anti-social behaviour will be pushed into Camden Garden residents.
- Planting should be conditioned to be maintained.
- Open areas and building frontages at street levels should design out ASB.

- The materials used at ground level must deter graffiti and be able to be properly cleaned when it occurs.

#### Housing Quality

- Number of units seems a low offering. Need to know if it will be affordable or social or key worker housing which is needed.
- Amenity space should be added to the roof to improve amenity quality.

#### Neighbouring Amenity

- There will be a negative impact on daylight/sunlight and overlooking to a number of habitable rooms in several properties and should be lowered in height. These properties are:
  - Barnes House, 9-15 Camden Road
  - 11-19 Kentish Town Road
  - Mansion Lock House, 13 Hawley Crescent
  - 33 Kentish Town Road
  - St Michael's Church
- Increased overlooking of a number of properties from the additional height and windows proposed.

#### Camden Town Cumulative Impact Area

- Condition should be attached preventing the site being used as a licensed premises (bars or night clubs) in the future.

### **Adjoining Occupiers**

4.5 Multiple site notices were displayed on Camden Road and Kentish Town Road from the 17<sup>th</sup> March until the 11<sup>th</sup> April 2021. A press advert was placed on 18<sup>th</sup> March 2021 in the Camden New Journal.

4.6 No objections were received during the public consultation.

## **5 Policies & Guidance**

### **5.1 National Planning Policy Framework 2021**

### **5.2 NPPG**

### **5.3 The London Plan 2021**

### **5.4 Mayor's Supplementary Planning Guidance**

### **5.5 Camden Local Plan (2017)**

- G1 Delivery and location of growth
- H1 Maximising housing supply
- H2 Maximising the supply of self-contained housing from mixed-use schemes



H3	Protecting existing homes
H4	Maximising the supply of affordable housing
H6	Housing choice and mix
H7	Large and small homes
C1	Health and wellbeing
C5	Safety and security
C6	Access for all
E1	Economic development
E2	Employment premises and sites
A1	Managing the impact of development
A2	Open space
A3	Biodiversity
A4	Noise and vibration
D1	Design
D2	Heritage
CC1	Climate change mitigation
CC2	Adapting to climate change
CC3	Water and flooding
CC4	Air quality
CC5	Waste
TC1	Quantity and location of retail development
TC2	Camden's centres and other shopping areas
T1	Prioritising walking, cycling and car-free development
T2	Parking and car-free development
T3	Transport infrastructure
T4	Sustainable movement of goods and materials
DM1	Delivery and monitoring

## 5.6 Supplementary Planning Guidance

### Camden Planning Guidance (2018/2019/2021)

Access for All CPG

Air Quality CPG

Amenity CPG

Biodiversity CPG

Community uses, leisure and pubs CPG

Design CPG

Developer Contribution CPG

Employment sites and business premises CPG

Energy efficiency and adaptation CPG

Housing CPG

Planning for health and wellbeing CPG

Public open space CPG

Town centres and retail CPG

Transport CPG

Trees CPG

Water and flooding CPG

**Camden Town Conservation Area appraisal and management strategy  
2007**

**Regent's Canal Conservation Area appraisal and management strategy  
2008**

## 6 Assessment

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

7	<b>Consultation and procedure</b>
8	<b>Land use principles</b>
9	<b>Housing mix, unit size, quality of accommodation and affordable housing</b>
10	<b>Demolition</b>
11	<b>Conservation</b>
12	<b>Design</b>
13	<b>Landscaping and trees, Open space, Nature conservation and biodiversity</b>
14	<b>Impact on neighbouring amenity</b>
15	<b>Basement Impact</b>
16	<b>Air quality</b>
17	<b>Sustainable design and construction</b>
18	<b>Flood risk and drainage</b>
19	<b>Transport</b>
20	<b>Safety and security</b>
21	<b>Refuse and recycling</b>
22	<b>Employment and training opportunities</b>
23	<b>Fire Safety</b>
24	<b>Planning obligations</b>
25	<b>Community Infrastructure Levy (CIL)</b>
27	<b>Conclusion</b>
28	<b>Recommendations</b>
29	<b>Legal comments</b>
30	<b>Conditions</b>
31	<b>Informatives</b>

## **7 Consultation and procedure**

### Consultation

- 7.1 A Statement of Community Involvement (SCI) has been submitted as part of the application which details the consultation that the applicant undertook prior to submitting their application.
- 7.2 Four Communications, a specialist public relations agency, was appointed by the Applicant to deliver a consultation programme in support of the development proposals for the site. Engagement was carried out remotely through digital consultation due to the Covid-19 Pandemic. All stakeholders identified in their stakeholder audit were offered one to one meetings to have a briefing on the scheme, six meetings were held. An advert was published in the Camden New Journal to encourage local people to register for the webinars. A newsletter advertising the public webinars were delivered to 2,400 residents surrounding the site. A website was set up which included details about the scheme, the site, FAQs and the consultation programme. A recording of the webinar is included on the website alongside their contact details to allow residents to get in touch with them. Two public webinars were organised for stakeholders and neighbours to present the scheme and answer any questions. 15 people attended the webinar in total. Throughout the consultation process, a dedicated telephone number and e-mail were promoted and provided. Officers consider this consultation was sufficient.

## **8 Land use principles**

### Principle of development

- 8.1 Policy G1 of the Local Plan sets out how the Council will create conditions for growth to deliver homes, jobs and infrastructure by supporting development that makes the best use of the site, providing a mix of uses in accessible parts of the borough (including self-contained housing) to deliver 16,800 new homes, 695,000sqm of new office floorspace and 30,000sqm of new retail floorspace by 2031. The Council anticipate the most significant growth to be delivered across the Borough, with Town Centres playing a key role in facilitating that growth. The Council will generally expect larger developments in the highly accessible areas such as Camden Town (Town Centre) to include a mix of uses. It is considered for the reasons outlined below in more detail within this 'Land Use' section that the development meets this expectation by significantly increasing the amount of office floorspace, providing 6 affordable homes and introducing commercial/retail units at ground floor fronting Kentish Town Road which creates an active frontage that didn't exist before.
- 8.2 The application site is also located within a highly accessible area (PTAL level 6b - the best), which is well served by public transport.
- 8.3 The existing site comprises 2865sqm in class E floorspace of which 2651sqm is used as office space and 214sqm is used as a gym. An additional 230sqm is a bar which is outside of any use class (sui generis). The proposed development

would introduce 523sqm of residential floorspace and increase the existing office space (Class E) to 6,657sqm with an additional 37sqm of flexible class E use. Overall, the total floorspace will increase by 4336sqm. Condition 36 restricts the class E office floorspace as proposed to solely be used as class E (g) to safeguard its future as an employment site that will continue to meet the needs of the knowledge quarter. Condition 37 restricts the class E commercial at ground floor fronting Kentish Town Road to only be used for town centre uses Class E a (Retail), b (food and drink) and c (professional services) to ensure a vibrant and active town centre frontage.

- 8.4 The proposed development would largely maintain and increase the existing key uses on site and would be in accordance with the character and established mix of uses in the existing buildings and the surrounding area. The proposed development and intensification of business, retail and residential uses would help meet the aspirations of both local and regional policy for this important Town Centre Location, and as such, the principle of development in this location is considered acceptable and in accordance with London Plan Policy and Local Plan Policy G1.

#### Mixed use policy and residential accommodation

- 8.5 Policy H2 requires a mix of uses in new developments, including a contribution to the supply of housing. In Town Centres, where development involves additional floorspace or more than 200sqm (GIA), the Council requires 50% of all additional floorspace to be self-contained housing. We will require self-contained housing to be provided on site, particularly where 1,000sqm (GIA) of additional floorspace or more is proposed.
- 8.6 The proposed development would deliver a mix of uses including employment (E), retail (E) and residential accommodation (C3). These uses are largely all currently on site (with the exception of residential), and the proposal would therefore maintain the overall character of the site while increasing the quantum of each use to conform generally to the Council's aim of securing mixed-use development. The overall increase in floorspace (GIA) would be 4,336sqm, split between non-residential and residential uses as follows:
- Non-residential floorspace uplift = 3,813sqm (87.9%)
  - Residential floorspace uplift = 523sqm (12.1%)
- 8.7 Policy H2, expects a requirement for 2,168sqm of the overall uplift (50% of 4,336sqm) to be provided as self-contained residential housing. The proposals would only provide 523sqm residential floorspace. Although this is lower than the policy requirement, the new residential units provided on site would comprise a good mix of dwelling sizes (discussed further below) and provide a good standard of accommodation. In terms of the quantity of on-site housing, this has been determined in part by the floorspace requirements of the office, as well as the form and adaption of the existing block, and this is discussed in more detail below. Officers considered additional height on the proposed block but felt it would be unlikely to be appropriate due to massing and potential amenity impacts

to neighbouring residential occupiers. It is therefore the optimised level of housing for this particular site.

- 8.8 The development would provide 3x 1-bed units and 3 x 2-bed units; however, rather than providing a combination of market and affordable, 100% of the residential floorspace would be affordable – Camden Intermediate Rented homes. In part, this is a result of the space constraints of the site and the floorspace requirements of the office use, which has prevented a compliant level of market housing provision without additional height and massing. Nevertheless, the affordable housing provision is very much welcomed by the Council.
- 8.9 In summary, the characteristics of the site and its physical constraints mean that the provision of less than 50% of the additional floorspace being in residential use is acceptable (subject to a contribution towards housing by way of a payment in lieu, which would form part of the affordable housing contribution calculated in section 8 below). Economic planning objectives would be achieved, commercial uses would be enhanced providing an active frontage and a significant uplift in residential accommodation would take place as there is none currently on the site. Overall, the proposed amount and balance of uses is appropriate for this site. As such, the proposed development and the provision of residential floorspace is considered to be in compliance with the aspirations of the development plan as a whole, particularly with reference to Local Plan Policy H2, and London Plan policy SD6.

#### Proposed office use

- 8.10 The proposed development would deliver a significant increase in office floorspace from 2,651sqm to 6,657sqm, an increase of 4,006sqm. This development has been designed with two end users in mind to take the whole office space. The site is located within a Town Centre and the draft SALP Knowledge Quarter which identifies that this area should continue to promote a world-class cluster of scientific and knowledge-based institutions and companies that specialise in areas like life sciences, data and technology and the creative industries.
- 8.11 Policy E1 of the Local Plan supports the provision of a range of business and employment floorspace including the intensification of existing employment sites and seeks to direct new office development to the growth areas, Central London and the town centres to meet expected demand. Policy E2 of the Local Plan reiterates that the sites which are suitable for business use will be protected and the intensification of employment uses will be supported provided they are maintained or increased. Policy E2 goes on to say that where premises or sites are suitable for continued business use, the Council will consider higher intensity redevelopment schemes which improve functional efficiency, maintain or, preferably, increase the amount of employment floorspace and number of jobs. Redevelopment should retain as far as possible existing businesses that desire to remain on the site and the re-provided employment floorspace on the proposal site should be designed flexibly to be able to accommodate a range of business



types and sizes, in particular small and medium-sized enterprises (SMEs) and businesses in growth sectors such as the creative industries.

- 8.12 The existing buildings are currently vacant. As such, the proposed development would not displace existing tenants or cause harm to Camden's local economy.
- 8.13 In line with the Employment Sites and Business Premises CPG, an element of affordable SME workspace from large scale employment developments with a floorspace of 1,000sqm (GIA or gross internal area) or more would be secured by a planning obligation. The scheme was revised to include 333sqm of affordable workspace. This is 5% of the total office floorspace, and 8% of the uplift. It is located at 1<sup>st</sup> floor near core and services, with a westerly aspect overlooking Kentish Town Road and it would be at 30% discount on market rate for 10 years. Both the office space and affordable workspace already have an end user in mind. The operator for the majority of the office space will be a local technology media company who are seeking to expand their workforce and wish to remain within Camden. The operator of the affordable workspace will be 'The Neighbourhood Office Ltd' (TNO). Established in 2014 in Bermondsey, TNO is an innovative co-working space for SMEs. TNO will also be dedicated to hosting The Climate Hub - a group of businesses, charities and social enterprises working at the cutting edge to mitigate climate impacts. The Council's Economic Development Team welcome this inclusion and a guaranteed appropriate end user, with a track record, ensures that the space will be occupied from completion. Affordable workspace will be secured by a S106 obligation.
- 8.14 The floorplates have been designed to be flexible with future SMEs in mind and the building could be easily divided up to accommodate multiple businesses if/when the currently proposed end users leave. This ensures flexibility to cater to different industries and occupiers in the future.
- 8.15 At ground floor the majority of the frontage on Kentish Town Road will be occupied by office space, with an office lobby and retail closer to the residential block. To ensure that the site retains an active frontage, a condition will secure details of an active frontage strategy.
- 8.16 Given the location of the site within the Town Centre and the SALP Knowledge Quarter and the existing office use of the site, the increase in office floorspace is considered appropriate in this location, and in accordance with policies E1 and E2 of the Local Plan, and London Plan policies SD6 and E1.

#### Proposed flexible retail use

- 8.17 The Kentish Town Road frontage is designated as part of the Secondary Frontage and is identified as a retail growth area by Policy TC1 of the Local Plan which seeks to promote the additional provision of retail floorspace as part of redevelopment schemes with the Camden Town Town Centre.
- 8.18 The existing site features 214sqm of retail/recreation (Class E) floorspace at present. The proposals are for 251sqm flexible retail floor space at ground within classes E. The flexible commercial space would front Kentish Town Road, with

three units. The proposed offer will provide high quality space with flexibility in mind, for retail, food/drink and professional services, with level access and an increase in active commercial frontage at ground floor along Kentish Town Road. As mentioned above their use will be secured by condition 37.

- 8.19 The proposed mix of uses are considered appropriate in this location, particularly the introduction of retail along the Kentish Town Road frontage is welcomed as it would aid in creating a sense of place and would contribute to the vitality, viability and diversity of this retail frontage.
- 8.20 In addition, it is recommended that the proposed ground floor level 'retail' unit fronting Kentish Town Road which adjoins the office lobby and shows connecting doors the floor plan shall be retained in this location and remain accessible to members of the public during hours of opening, to ensure it is not converted to other ancillary office accommodation and to safeguard the character, function and vitality of the area (condition 30).
- 8.21 With these controls in place, the proposals would comply with policy SD6 of the London Plan and policy TC1 of the Local Plan.
- 8.22 TRACT raised concerns that the Class E use could be used as a pub/night club. Both of these uses are sui generis, not Class E, and therefore would be require planning permission.

#### Loss of class E (recreation/fitness) and bar (Sui Generis)

- 8.23 Although No.16 was originally designed as a creche (Class E) it was last occupied as a recreation/fitness unit (Class E), it is currently in use as a personal training studio. Normally the Council would seek to retain leisure uses but it falls within Class E which covers a wider range of uses which do not require additional planning permission to operate. The scheme does re-provide Class E on site, but there is limited control within this use.
- 8.24 Within Grand Union House there was a bar, however this has again been vacant since April 2020 when it ceased trading as it was no longer viable. It is considered that the site should now have more compatible uses as it is introducing housing beside it. In addition, the proposed class E (office and commercial) introduces an active frontage to Kentish Town Road which contributes to the character and vitality of the Town Centre, as well as the streetscape.

#### Conclusion; land use principles

- 8.25 Overall, the proposed development is considered to have an appropriate mixture of uses for the site that would enhance the existing spaces while benefitting a number of the Council's policy objectives by contributing towards a successful economy and retail function, whilst making an appropriate contribution towards the Borough's supply of housing. As such, the development on balance is considered to be in accordance with the Camden Local Plan and London Plan and is acceptable in this regard.

## **9 Housing mix, unit size, quality of accommodation and affordable housing**

### Policy review

- 9.1 Local Plan Policies H1, H2, H3, H4, H6, H7 and the Housing CPG, and London Plan policy H1 are relevant with regards to new housing, including to tenure and unit size. Local Plan policy H6 is relevant with regards to the amenity of proposed housing.

### Mix of unit sizes

- 9.2 The existing site contains no residential units. The proposal includes six residential units made up of 3x 2Bed and 3x 1Beds.
- 9.3 In accordance with the requirements of the Government's Housing Delivery Test, the Council has published a Housing Delivery Test Action Plan. This sets out a series of actions to ensure that Camden is able to meet its housing requirement in future years. The housing delivery plan has been produced as the data shows that housing completions in Camden in recent years have fallen below the borough's housing delivery target. Between 2016/17 and 2018/19, Camden had a target of 3,360 new homes and 2,924 were delivered. This equates to 87%. Under the 2019 rules if delivery falls below 95%, authorities must publish an action plan to explain how they intend to increase delivery in future years. This should be taken into account when the Council are making decisions on applications which if approved would enable the delivery of additional housing for the borough.
- 9.4 Policy H7 seeks to provide a range of unit sizes to meet demand across the Borough. For intermediate units, table 1 of this policy considers 1 bedroom/studios as high priority, 2-bedroom units to be of medium priority, 3-bedroom units lower priority and 4 bedroom (or more) a lower priority. The proposal would provide an acceptable mix of unit sizes so that half (50%) would be high priority units and half medium. This is acceptable in the context of the small scale of the residential element, and the characteristics of the site and meeting the demand of the tenure (Camden Intermediate Rent). On this basis, the unit mix is considered to be acceptable and in accordance with policy H7.

### Design and layout

- 9.5 The Ministry of Housing, Communities and Local Government (MHCLG) (now the Department for Levelling up, Housing and Communities) released nationally described space standards in March 2015, which are incorporated in the Local Plan. The minimum gross internal floor areas are set by the number of bedrooms and bed spaces/occupiers in each dwelling. The development would provide three 2 bedroom/4 person flats and three 1 bedroom/2 person flats, which require a minimum of 50m<sup>2</sup> and 70m<sup>2</sup> respectively. All of the units comply with the national standards and comfortably exceed them. The 2 bedroom flats would measure 71.4sqm, and the 1 bedroom flats would measure 56.5sqm. The floor plans for the 2bed flat layout were revised to remove underutilised corridor space

and increase the bedroom sizes which is an improvement. All bedrooms in all the proposed units meet the size guidance.

- 9.6 The flats would be located in a separate adjoining block to the southern end of the site at No.16 Kentish Town Road from the first floor upwards, fronting Kentish Town Road. All units would be dual aspect with private balconies to the rear. All units would have private amenity space which meet London Plan standards for units of their size.
- 9.7 The proposed development is therefore considered to provide an acceptable standard of residential accommodation.

#### Access and inclusive design

- 9.8 New build residential developments must comply with the access standards in Part M of the Building Regulations. This includes parts 1 (Visitable dwellings), 2 (Accessible and adaptable dwellings) and M4 (3) wheelchair user dwellings. The Council expects all new build housing development to go above the minimum mandatory Building Regulations with a requirement to meet Building Regulations part M4 (2); and in this case for 10% of the units to meet part M4 (3) (wheelchair housing). Although there are only 6 new units proposed, one unit will be fully wheelchair accessible and would be secured by condition (29). The one bed at 1<sup>st</sup> floor is shown as being the wheelchair unit.

#### Daylight and sunlight (DLSL)

- 9.9 No internal DLSL assessment of the proposed residential units has been submitted. However, the new residential building will have generous windows on the Kentish Town Road frontage to provide good daylighting to all the living/kitchen areas, whilst all the bedrooms are located on the rear elevation with access to private balconies. All units are dual aspect facing west and east. In addition, they will have shallow floor plates which will allow good light penetration from both aspects. The main living space has large windows facing over a large road with a western aspect which will provide good light. It is therefore considered that the new units would have acceptable levels of light.

#### Affordable Housing

- 9.10 Policy H4 of the Local Plan seeks to maximise the supply of affordable housing, in line with aiming to exceed the Borough wide strategic target of 5,300 affordable homes from 2016/17-2030/2031. The Camden Strategic Housing Market Assessment estimates a need for around 10,000 additional affordable homes from 2016-2031. Policy H4 has a sliding scale target that requires an additional 2% affordable housing per capacity for each additional home. Capacity for one additional home is defined within the Local Plan as the creation of 100m<sup>2</sup> of additional residential floorspace (GIA). In assessing capacity, additional residential floorspace is rounded to the nearest 100m<sup>2</sup> (GIA). The affordable housing target of 50% applies to developments with capacity for 25 or more additional dwellings. Schemes providing between 1-9 units will be expected to make a payment in lieu (PiL) of affordable housing, subject to viability.

9.11 Policy H2 states that in considering whether housing should be provided on site and the most appropriate mix of housing and other uses, the Council will take into account criteria (a) to (e) and the following additional criteria:

- f. the need to add to community safety by providing an active street frontage and natural surveillance;
- g. the extent of any additional floorspace needed for an existing user;
- h. the impact of a mix of uses on the efficiency and overall quantum of development;
- i. the economics and financial viability of the development including any particular costs associated with it, having regard to any distinctive viability characteristics of particular sectors such as build-to-let housing; and
- j. whether an alternative approach could better meet the objectives of this policy and the Local Plan.

9.12 The demolition and creation of a new office building has been driven by having two end users in mind who have stated that they require a certain floorspace to operate and take over the space. On site housing can be provided in a way which allows the floorspace to be provided for the end users, and this housing is proposed in a separate block to the office on the adjoining site No. 16 Kentish Town Road. The amount of on-site housing has been determined in part by the constraints of reusing parts of the base structure of Grand Union House, the scale of development considered appropriate for 16 Kentish Town Road, and the floorspace requirements of the offices for the end users..

9.13 Based on the uplift in floorspace of 4,336sqm and in accordance with policy H2, the development would be expected to provide 2,168 sqm of housing with a split between affordable and market as determined by policy H4 (see below paragraph for calculation). The development would provide 523sqm of residential accommodation in the form of 3 x 2-bed and 3x 1 bed units; however, rather than providing a combination of market and affordable (44% of housing floorspace would be expected to be the target for affordable – see below), 100% of the residential floorspace would be affordable at Camden Intermediate Rents. In part, this is a result of the space constraints of the site and the floorspace requirements of the office use, which has prevented a compliant level of market housing provision without additional height and massing.

9.14 Because there is shortfall of onsite housing, a payment in lieu of full on site delivery is required. The payment in lieu is calculated by multiplying the target affordable floorspace by the cost per square metre of £1,500. This equates to a further financial contribution of £2,467,500 in line with policies H2 and H4 of the Camden Local Plan.

9.15 The payment in lieu calculation is shown below.

Total addition to floorspace proposed	4,336 sq m GIA
Self-contained housing floorspace target	$4,336 \times 50\% = 2,168$ sq m GIA
Capacity	$2,168 / 100 = 22$ additional homes
On-site addition to self-contained housing floorspace provision - market	0 sq m GIA
On-site addition to self-contained housing floorspace provision - affordable	523 sq m GIA
Affordable housing percentage target (capacity x 2%)	$22 \times 2\% = 44\%$
Affordable housing floorspace target (= shortfall in this scenario)	$2,168 - 523 = 1,645$ sq m GIA
Payment-in-lieu of affordable housing (shortfall GIA x £1,500 psm)	$1,645 \times £1,500 = £2,467,500$
<b>Total payment</b> (affordable housing shortfall only)	£2,467,500

### Viability

9.16 Policies H2 and H4 both state that the council will take account of the financial viability of a scheme when considering the provision of market and affordable housing. A Financial Viability Assessment has been submitted and this has been reviewed by the Council's independent auditor BPS. After significant negotiations, BPS' final appraisal has been issued and is attached in appendix 1. The agreed Benchmark Land Value (BLV) is £7.33m and the development would provide a marginal deficit of £3,494. A viability summary table is shown below.

<b>Viability summary</b>	
Affordable housing floorspace (%)	100%
Benchmark Land Value (BLV)	£7,330,000
Gross development value (GDV)	£60,524,168
Construction Costs	£30,829,133
CIL and planning obligations	£441,558
Professional Fees	£3,481,576
Other costs total (fees, disposal, finance)	£1,694,674
Developer profit – affordable (% of GDV)	6%
Developer profit – commercial (% of GDV)	15%
Residual Land Value (RLV)	£7,326,506

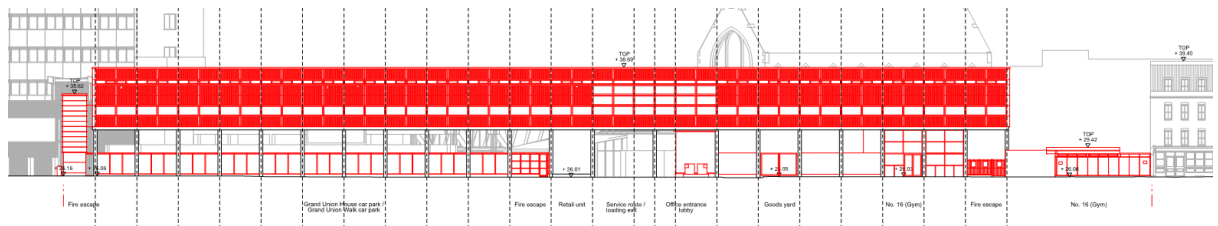


9.17 BPS are therefore satisfied that the appraisal demonstrates that the scheme cannot viably deliver an improved level of affordable housing and that the payment in lieu cannot be paid up front. Therefore, a deferred contribution is required and would be secured with a review mechanism under the S106 legal agreement.

9.18 The review mechanism would use the same key inputs, but by such time that the majority of actual recorded sales, rental values, and build costs, would be available. The review will assess if the applicant is able to make a greater contribution and any identified surplus at that time would then be split between the developer and council at a split of 40% and 60% respectively. The deferred contribution would be capped at £2,467,500.

## 10 Demolition

10.1 The proposal involves the partial demolition of Grand Union House and the complete demolition of the single storey building at 16 Kentish Town Road. In terms of the level of demolition to Grand Union house, this will include the structure above the existing first floor concrete slab (superstructure to remain) and the elevations. This is shown in the demolition drawing below.



*Figure 3: Front elevation (Kentish Town Road) showing the scope of demolition.*

10.2 Policy D2 (Heritage) resists the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area. The GUH building is noted as a positive contributor to the Conservation Area within the Map that is appended to the Conservation Area Statement, however it is not listed within the Conservation Area Statement as a positive contributor. Although the building has a poor and unresolved ground floor environment which is damaging to the streetscape and wider area, it also has some positive features. Its long linear form references the former bakery on the site, and it uses the same hi-tech architectural language as the adjacent high quality Grimshaw buildings. Overall, officers consider the building to make a neutral contribution to the conservation area. No.16 is not recognised as a positive contributor in the conservation area appraisal, nor is it shown as a negative detractor. Whilst the single storey scale is out of character and leaves a gap in the streetscape, this is not sufficient to harm the character of this part of the conservation area. Overall, both buildings are considered to make a neutral contribution to their respective conservation areas.

- 10.3 The existing elevation of Grand Union House at ground floor on Kentish Town Road appears brutal and defensive with its gated car park and anti-climb measures which detracts from the streetscene and Conservation area. This empty, unoccupied space, partially screened from the road, attracts anti-social and criminal behaviour see figure 4. This presents a significant opportunity to improve the street and area in general. Therefore, it's infilling and replacement with a high quality design which reflects the hi-tech architectural style is a great improvement. It will transform its underutilised and problematic space at ground floor to provide improved transparency and surveillance which will address the current anti-social behaviour issues.



*Figure 4: Images of the existing front elevation on Kentish Town Road*

- 10.4 There is limited architectural merit to the upper floors and the development will replace this and enhance the site. The retention of the superstructure at the lower levels allows reuse of materials and significant structural elements which reduces waste and release of embedded carbon which is welcomed. The demolition will allow for an enhanced office layout and flow with enough additional floorspace to

cater for the secured tenants. The existing single storey building at No.16 again appears defensive and does not offer much in terms of street activation or aesthetic design and given its single storey nature and footprint, there would be no merit in retaining or reusing this building. The site can support a higher density than existing and is currently underutilised.

- 10.5 Given the above there is no objection to the loss of these buildings on design and heritage grounds. The development will create a better relationship with the neighbouring listed hi-tech buildings, the streetscape, and the conservation areas, than the existing which has a more limited contribution.
- 10.6 Policy CC1 (Climate change mitigation) requires all proposals that involve substantial demolition to demonstrate that it is not possible to retain and improve the existing building. All proposals for substantial demolition and reconstruction should be fully justified in terms of the optimisation of resources and energy use in comparison with the existing building.
- 10.7 A detailed Whole Life Cycle Assessment is not required in this instance, as the scheme falls somewhere in between substantial refurb and total/substantial demolition. Nonetheless in line with policy CC1, the applicant has provided details within the energy and sustainability statements regarding carbon.
- 10.8 The sustainability statement outlines that a pre-demolition audit will be carried out prior to works commencing on site. This audit will highlight the potential for maximum material recovery through demolition and provide a bill of quantities of tonnages that will arise. A report will be produced detailing materials arising as well as a list of suggested actions to be undertaken so that maximum material recovery is achieved. This will be secured by condition 14 through a 'resource management plan'. The foundations and superstructure up to first floor level are to be retained and reused – the current building already reuses the former bakery' foundations so this will be its second reuse. Although this imposes some limitations in terms of proportions and building line, it allows for resource efficiency and quicker construction.
- 10.9 Furthermore, the flexible floorplates ensure that the building is adaptable for alternative uses in the future. This would enable the use of the building to change in the future with minimal interventions to the building, which meets the aspirations of policy D2 which states that design should be durable in construction and where appropriate should be flexible and adaptable for a range of uses over time.
- 10.10 Overall, the proposed demolition of the existing buildings is considered acceptable in this instance given the low architectural and sustainability quality of the majority of the existing buildings on site, the reuse, recycling and adaption of existing structures and materials, and the sustainability improvements provided (Energy and Sustainability is discussed in more detail in section 17), in accordance with policies D1, D2, and CC1 of the Camden Local Plan 2017.

## **11 Conservation**

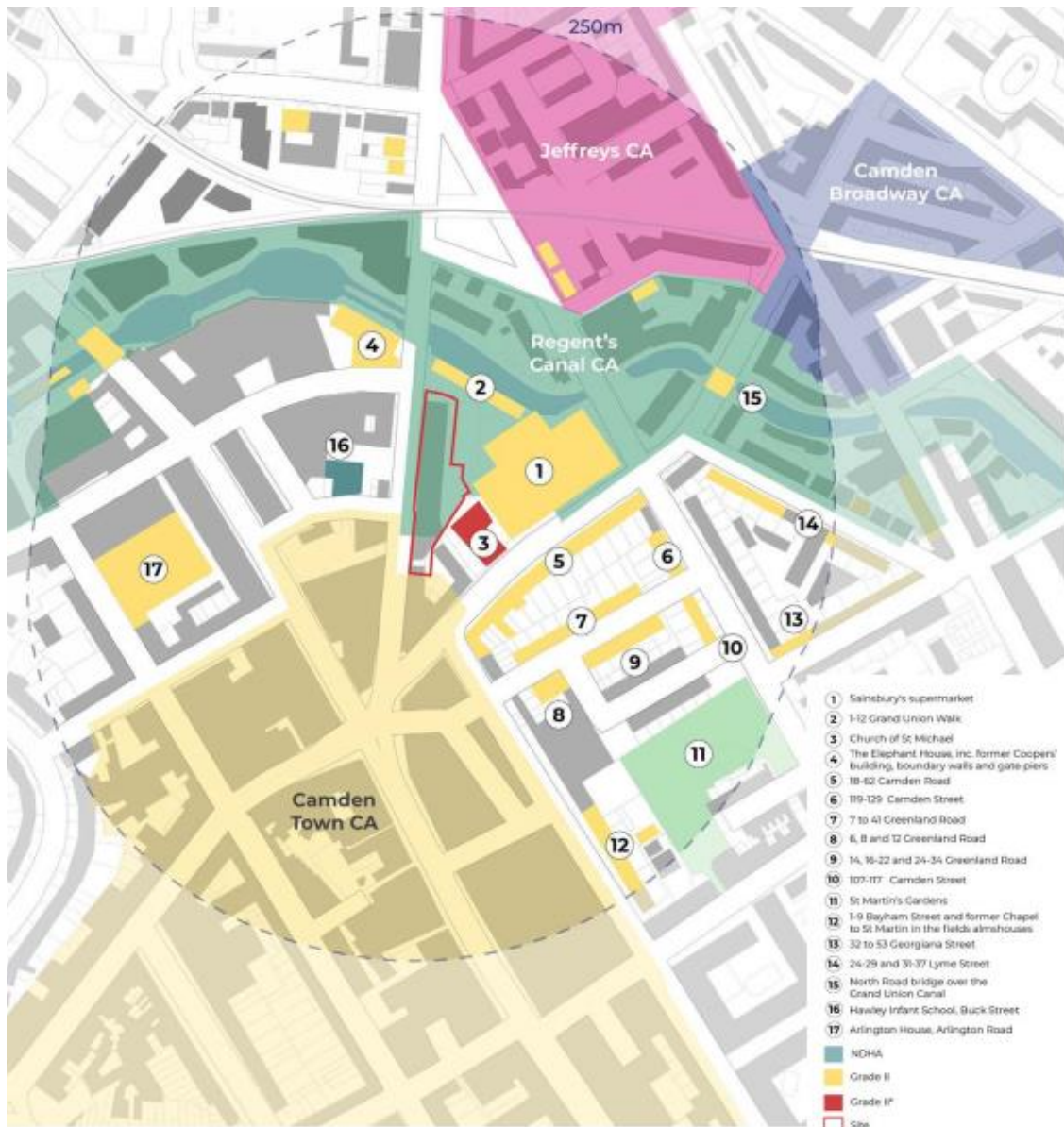
## Legislative background

- 11.1 Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (“the Listed Buildings Act”) states that in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority shall 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.
- 11.2 Section 72 of the Listed Buildings Act also requires local planning authorities to pay **special attention** to the desirability of preserving or enhancing the character or appearance of conservation areas.
- 11.3 The effect of these sections of the Listed Buildings Act is that there is a statutory presumption in favour of the preservation of Listed Buildings and their settings, and conservation areas. Considerable importance and weight should be attached to their preservation. A proposal which would cause harm to their significance should only be permitted where there are strong countervailing planning considerations which are sufficiently powerful to outweigh the presumption.
- 11.4 The duties imposed by the Listed Buildings Act are in addition to the duty imposed by section 38(6) of the Planning and Compulsory Purchase Act 2004, to determine the application in accordance with the development plan unless material considerations indicate otherwise.
- 11.5 Paragraph 195 of the NPPF states:
- “Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal.”*
- 11.6 Reflecting the statutory requirement for special regard and attention to be given to preservation of designated heritage assets, paragraph 199 confirms that great weight should be given to the asset’s conservation. Paragraph 202 states:
- “Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”*
- 11.7 The following section appraises the impact on nearby heritage assets as far as is relevant to the context of the application, before considering how the significance of these assets would be impacted by the proposals. Figure 5 shows a map of the nearby designated heritage assets surrounding the site.

### Identified heritage assets

- 11.8 While the site itself is not listed, it is adjacent to the Grade II listed Sainsbury's superstore identified as (1) on the map in figure 5, and terraced dwellings at Grand Union Walk identified as (2) in figure 5, both part of the Grimshaw development.
- 11.9 Both the housing and the Sainsbury's superstore are successful parts of an ambitious mixed-use scheme. In contrast, Grand Union House (GUH) and the service yard were never as successfully resolved, and were not listed alongside the other two buildings.
- 11.10 The majority of the site – the GUH parcel of land – is within the Regent's Canal Conservation Area, and 16 Kentish Town Road is within the Camden Town Conservation Area.
- 11.11 There are other listed buildings around the site - St Michael's Church (Grade II\*) identified as (3) on the map in figure 5 and immediately to the south east. There is also a grade II listed war memorial in the grounds of the church, between the church and Barnes House. The Elephant House (Grade II) on Kentish Town Road and opposite the site is identified as (4) in figure 5. Further to the east, on the east side of Camden Road, the terrace identified as (5) in figure 5 is in part listed but not in a conservation area (figure 5 incorrectly identified the whole terrace as listed). The row of 23 houses from 18 to 62 Camden Road is grade II listed, and the buildings from 8 to 16 Camden Road is a group of locally listed buildings which are non-designated assets. The former Hawley Infant School on Buck street, opposite the site to the west, is also locally listed and is identified as (16) on figure 5.
- 11.12 The other heritage assets are further from the site or have no notable visual connection and no impact or harm has been identified.





*Figure 5: Location of heritage assets surrounding the site*

11.13 The applicants have submitted a Townscape, Visual Impact and Heritage Assessment that contains 15 verified views from the most sensitive locations surrounding the site that were agreed with officers prior to submission. The viewpoints include Kentish Town Road, Camden Road and buck Street.

Sainsburys and Grand Union Walk (Grade II designated) (1 and 2) – **no harm** (enhanced)

11.14 Both buildings are excellent examples of Hi-Tech architecture, a style which borrows from the worlds of engineering and construction and emerged as a branch of Modernism in the late 1960s. Nicholas Grimshaw is one of the pioneers of Hi-Tech architecture – he received a knighthood for services to architecture in 2002 and is the 2019 recipient of the RIBA Royal Gold Medal. The Grand Union Complex was the first piece of urban design undertaken by his practice. The buildings are sympathetic to their surroundings and are considered to be a rare



and successful incorporation of Hi-Tech architecture into a sensitive urban context.

11.15 Sainsburys supermarket was listed for its architectural and historic interests:

- as a powerful piece of contextual inner-city High-Tech, integrating an overtly modern aesthetic into Camden's historic urban grain;
- in the creative use of structure to meet a challenging brief, boldly and exaggeratedly expressed to striking effect;
- in the technological innovation of its intumescent coating, allowing the frame to be left exposed in a densely developed environment;
- as a resourceful piece of retail planning which successfully meets the complex, space-hungry demands of a supermarket on a tight urban site;
- as the centrepiece of a successful mixed-use scheme which marked a turning point in the career of Nicholas Grimshaw, one of the country's leading proponents of Hi-Tech architecture; and
- as a rare example of the important but typically mundane post-war building type, the supermarket, being designed as a highly original, bespoke piece of architecture; a project made possible by the ambition of the architects, the client, and the local authority.

11.16 1-12 Grand Union Walk, London, is listed at Grade II for the following principal reasons:

- in its bold styling, resourceful planning and creative use of materials and detail, it is a scheme which exploits the canal-side setting with humour and panache;
- as one of few examples of Hi-Tech style applied to housing; and
- as part of an ambitious and successful mixed-use scheme which marked a turning point in the career of Nicholas Grimshaw, one of the country's leading proponents of High-Tech architecture.

11.17 Grand Union House was explicitly excluded from the listing of the two other buildings, despite being designed and built as part of the complex. It has only a limited contribution to the significance of the listed buildings through their setting, largely through the complimentary use of Hi-Tech architecture.

11.18 The Camden Town CAAC objected as they considered that this development does not respect the neighbouring newly listed buildings (Grand Union Walk and the Sainsburys Supermarket). Views 10, 11 and 12 demonstrate impacts on the setting of the Sainsbury's building. The proposal uses complimentary hi-tech design and materials to help it integrate with and reference the rest of the Grimshaw complex.

11.19 View 10 looks from the Sainsburys car park along the rear of the site towards the church of St Michael. This will be read in relation to the other built form overlooking the central Sainsbury's (service) yard, directly opposite the listed supermarket. The curtain walling and form allow the building to still express the linear form and hi-tech vernacular of the existing GUH but do so more successfully and without competing with the listed building. Grand Union Walk houses back onto the service yard with a blank façade so their setting is not impacted from this side.



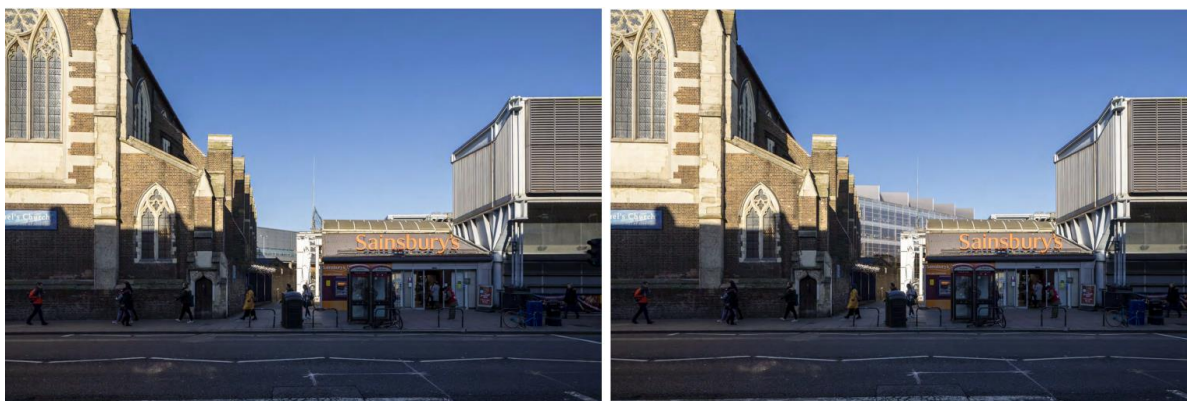
*Figure 6: VIEW 10: Sainsbury's car park: to the rear of the site*

11.20 View 11 is taken from the southern pavement of Lyme Street looking SW and west along Camden Road towards to Sainsburys Supermarket, this view will remain largely unchanged except with a brief glimpse of the zig-zag roof. The roof blends in and compliments the materiality of the listed supermarket.



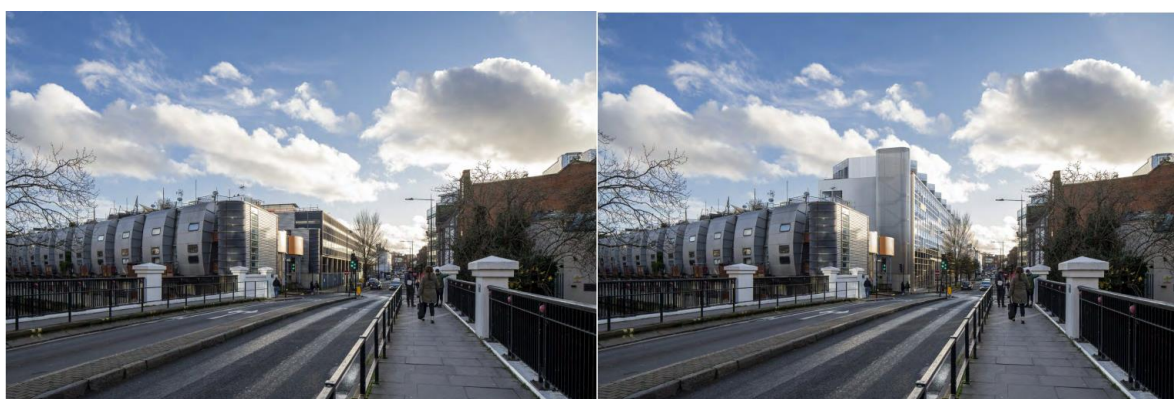
*Figure 7: VIEW 11: Camden Road: Junction with Lyme Street*

11.21 Viewed from the Camden Road Grand Union House forms a backdrop between the church and the listed supermarket (View 12). The east elevation of the proposed commercial building will be partly visible from this location. It will be read in relation to the other built form overlooking the central Sainsbury's service yard. Although higher than the existing GUH building, the top set back storey with a zig-zag elevation will create individual triangular external roof terraces that add visual interest to the background of the view. The curtain walling and metal cladding will form an appropriate background to the listed Sainsbury's store which will remain the focal point of the view.



*Figure 8: VIEW 12: Camden Road: looking West between St. Michael's Church and the lower part of Sainsbury's*

11.22 The proposal's complimentary hi-tech design and materials also help it integrate and tie it to the setting of Grand Union Walk, particularly when viewed from Kentish Town Road Bridge (View 09). The escape stair although now taller, mimics the design of the existing and does not appear as an incongruous feature on the building.



*Figure 9: VIEW 09: Kentish Town Road Bridge*

11.23 For the reasons above the development would not harm the setting of these two listed buildings. It would enhance the surrounding space and provide a stronger contextual backdrop to the listed buildings, enhancing their setting.

#### Church of St Michael (Grade II\* designated) (3) – no harm

11.24 The Church of St Michael, located on Camden Road, is an imposing building in Decorated Gothic. It was the first of the London churches designed by GF Bodley and T Garner, both pupils of George Gilbert Scott, and both exponents of high Victorian ecclesiastical architecture. Built in yellow stock brick with stone dressings the building was begun in 1880 with additions throughout the following decades although an intended tower was never built. The building is listed Grade II\* on account of the architectural significance of the interior decorations which are to Bodley's design.

11.25 TRACT objected on the grounds that they believe that that the roofline of Grand Union House will negatively impact the view of the listed St Michaels Church from Buck Street and Stuckley Place. View 06 highlights the views from Buck



Street at the junction with Stuckley Place. Glimpses of the church roof appearing above the roof of the current Grand Union House are visible from this location. The Council's conservation officer does not consider this to be a principal or significant view. The view of the church is obscured by the GUH building. From the west there are no views which 'frame' the church in any visually aesthetic way. The view does not contribute to the significance of the building. The proposed development will not be a new element in the view, albeit it will have a larger scale and height than the existing Grand Union House. The closing off of this limited and low value view, with a building of greater visual interest than the current GUH building, would be a positive enhancement of the view, the streetscape and the conservation area character and appearance. This will not affect the significance of the asset as its setting has always been urban and its location tightly locked into the surrounding urban grain.



*Figure 10. VIEW 06: Buck Street: junction with Stuckley Place*

- 11.26 View 10 looks from the Sainsburys car park along the rear of the site towards the church of St Michael. The existing arrangement is not very aesthetically pleasing with concrete prevailing and an unattractive undercroft for car parking. The east elevation of the proposed commercial building will be visible almost in its entirety. This will be read in relation to the other built form overlooking the central Sainsbury's (service) yard, including the Grade II listed St Michael's Church. The proposed development seeks to remediate the existing blank east elevation through opening up and providing both overlooking of the service yard, pedestrian link through the site, and the creation of a visual link with the listed Church through architectural expression. The scale and height of the proposal has also taken into consideration the presence of the Church immediately to the east of the site. Albeit higher than the existing building and lower than the proposed GUH, the pitched roof of the Church will remain a prominent element in both mid-distance and close views of the Church. The reflections of the Church on the curtain walling will add visual interest. The curtain walling itself will allow the interior of the office space to be observed from the outside and the openness of the internal layout will allow glimpsed views through to Kentish Town Road.
- 11.27 Views 12 and 13 are taken either side of the Church of St Michael from Camden Road with Grand Union House in the background to the rear of the church. The east elevation of the proposed commercial building will be partly visible from this location in View 12. It will be read in relation to the other built form overlooking the central Sainsbury's service yard, including the Grade II listed St. Michael's Church. The scale and height of the proposal has taken into consideration the

presence of the Church immediately to the SE of the Site. Although higher than the existing GUH building, the Church will remain the primary focal point in the view, along with the Sainsbury's to the right. The top set back storey with a zig-zag elevation will create individual triangular external roof terraces that add visual interest to the background of the view that does not interfere with the strong form of the church.



*Figure 11: VIEW 13: Camden Road: NW from bus stop S*

- 11.28 The east elevation of the proposed commercial building will not be visible in its entirety in View 13. Instead, it will be read in relation to the other built form on Camden Road, most importantly, the Grade II listed Church of St Michael on the right. The top element of the proposals will be somewhat obscured by a mature tree in the churchyard. The residential element of the proposed development will be hardly discernible from this location. The backdrop provides a greater sense of enclosure to the church yard in which sits the grade II listed First World War memorial which was erected in 1920. The church yard and its memorial makes some contribution to the significance of the listed building through their functional relationship, but the increased enclosure does not undermine this contribution. There is no harm to the setting of the listed church, or the war memorial.

#### Elephant House and Coopers' Building (Grade II designated) (4) – no harm

- 11.29 The Elephant House, a former bottle store, and coopers' building were built in 1900-1 by William Bradford, a pre-eminent architect of ornamental breweries, for the Camden Brewery. Brewing had become a major industry by the early 19th Century and although monumental in size, brewery buildings tended, on-the-whole, to be architecturally utilitarian in style. However, by the mid-19th Century the competitiveness of trading had given rise to the emergence of 'ornamental' brewery buildings which, from the 1890s, functioned as advertisements for the brewery's products. The Elephant House and Coopers' Building are listed for their architectural interest, the quality of the brickwork, the delightfulness of the decorative panels of brick and terracotta, and their rarity as a surviving inner-city industrial complex situated on the early-19th Century Regent's Canal.
- 11.30 TRACT objected on the ground that the building height, including the escape stair to the canal side, negatively impacts The Elephant House when viewed from the Regent's Canal towpath and Kentish Town bridge.



11.31 View 08 shows the view from Regent's Canal's towpath looking south-east, the existing (left) and proposed view (right) are shown below. A closer view (view 9) taken from Kentish Town bridge has also been provided (see above).



Figure 12. VIEW 08: Regent's Canal: towpath looking south-east

11.32 At present, a small section of the northern part of the existing building is visible West of the listed houses at Grand Union Walk. The Grade II listed Elephant House (red brick flank wall) is on the other side of the road in the photos above. While the development would now be more visible due to its height, this increase in scale and height will be appropriate to this location as it will address and reinforce the mixed character of this end of Kentish Town Road on a site within Camden town centre. The form of this flank wall with the sky behind it does not make any contribution to the significance of the listed building. Similarly, the view from the bridge (View 9) is not important in revealing the significance of the listed building. The building is opposite the site and its front façade is one of the key elements of significance for the listed building. However, its existing setting is one of a varied urban environment with modern hi-tech architecture opposite. This setting would be preserved, albeit with better resolved architecture. There would be no harm to the setting of the listed building.

18 to 62 Camden Road (Grade II designated) and 8 to 16 Camden Road (locally listed - non-designated) (5) – no harm

11.33 The listed terrace is a collection of 23 houses, some with later shops. They are early 19<sup>th</sup> Century, with shops from mid-19<sup>th</sup> Century. They are three to four storeys (Nos. 26-62 with attic storeys) and provide a strong building line and streetscape opposite the Sainsbury's. Their setting is very much limited to the context of Camden Road and the relationship to the Sainsbury's. Views 12 and 13 from in front of the terrace look away and so its relationship is only really appreciated from views along Camden Road (view 11 for example). However, in those views, the proposal sits to the side and provides a backdrop for the Sainsbury's rather than relating to the listed terrace. There is no harm to the setting of the listed terrace.

- 11.34 The locally listed terrace has a very similar relationship, only with less of a connection and relationship to the Sainsbury's as they sit further south. As such there is also no harm to the setting of the locally listed buildings.

Hawley Infant School (locally listed - non-designated) (16) – no harm

- 11.35 The former Hawley Infant and Nursery School relocated to Hawley Road in 2016 and the site is vacant. It is part of a site earmarked for a Transport and Works Act Order (TWAo) to clear the site and provide a second station entrance to Camden Town Tube Station. The TWAo has not been granted and there is no current known programme for proceeding with it. The building is a late 19th Century school. The site is relatively well hidden from the street behind brick walls, but the tall gables, clay tiled roofs, brick chimney and tops of the upper-level windows with their red brick surrounds give a good indication of the character of the site. The proposal would not interfere with the setting or significance of the non-designated asset and it would remain in its setting of a varied and evolving urban environment. There would be no harm.

Listed buildings impact conclusion

- 11.36 Overall, although there is variety of visibility of the development, particularly in relation to the listed buildings, the development's siting, materiality, detailed design and scale does not harm to the quality of architecture that gives each listing its significance.
- 11.37 The development has been carefully designed to respond to the hi-tech architecture found in the Sainsburys Supermarket and Grand Union Walk and improves their setting. Both the church and the Elephant House complex are architecturally robust buildings which hold their own within the streetscape, which is eclectic with buildings from different centuries in differing architectural styles contributing equally to the visual quality of the built environment. This commonality and contrast of both materials and architectural styles provides a visually interesting environment which leaves open the options for the style of any replacement building.
- 11.38 It is acknowledged that that the proposals would result in a minor visual impact to the setting of the listed heritage assets. However, for the reasons discussed above, officers do not consider this impact to result in harm to the significance of the heritage assets.

Regent's Canal Conservation Area – no harm

- 11.39 GUH and the whole Sainsbury site fall within the Regent's Canal Conservation Area while no.16 Kentish Town Road is located in the Camden Town Conservation Area. The character of Regent's Canal changes dramatically along its course, ranging from enclosed spaces to wider open spaces; hard industrial townscapes to semi-rural sections; buildings butt up against the Canal edge while others are set back with landscaping adjacent to the Canal. The site falls within 'Sub-Area 2' ('Kentish Town Bridge to Gray's Inn Bridge') as outlined in the Regent's Canal CA Assessment.

- 11.40 As discussed in section 10 demolition, the brutal and defensive appearance of the ground floor of Grand Union House attracted anti-social behaviour and detracts from the streetscene and Conservation Area. The new development is highly glazed with revealed structural detail, and in keeping with the Hi-Tech Architectural found in the other listed group buildings, it now provides an open and active frontage for natural surveillance. It is considered that the development causes no harm to the character and appearance of the conservation area and rather enhances it and compliments the neighbouring Hi-Tech listed buildings and the character of this part of the conservation area.

#### Camden Town Conservation Area – no harm

- 11.41 No.16 Kentish Town Road is located on the northern edge of the Camden Town conservation area. Traversed by important thoroughfares, Camden High Street, Kentish Town Road, Camden Road, the northern sector of the conservation area has a more overtly commercial character. As a result of the commercial pressure for redevelopment, the northern sector of Camden Town is architecturally eclectic and where historic buildings survive, there is a greater tendency for alterations. This commercial/industrial mix of buildings can be clearly tied to the presence of the Regent's Canal which defines the northern extent of Camden Town. Unfortunately for the visual quality of the townscape, the architectural quality of the area has, to a greater extent, been compromised by the demise of the commercial viability of the canal, war damage, and continual aesthetic erosion by piecemeal architectural change.
- 11.42 In the late 19<sup>th</sup> Century Kentish Town Road, south of the immediate environs of the canal, was lined with uninterrupted terraced housing, a church and Turkish Baths. By 1935 industrial development had swept the northern residential buildings away to be replaced by commercial and municipal buildings. By 1953 the site of No.16 is identified as 'ruins'. The current building came forward as part of the post-war redevelopment of the site.
- 11.43 No.16 is currently highly screened behind a defensive boundary wall and gates. The low scale results in a hole in the townscape which fails to activate the street. The current defensive nature of the site and lack of street frontage activation is directly addressed. The replacement residential building is considered to open up this site and provide a positive presence within the street scene. While still modest the new building will have a less muted appearance, which reflects the design and material palette of the proposed building at Grand Union House, whilst connecting to the urban grain of the adjacent terrace. The character of this part of the conservation area would be enhanced.

## **12 Design**

### Policy review

- 12.1 Policy D1 of the Camden Local Plan seeks to secure high quality design in all development by requiring development to respond to local character and context, be highly sustainable in design and construction, integrate well to the surrounding streets and townscape, comprise high quality architecture, and be accessible for all. Policy D2 states that the Council will only permit development



within conservation areas that preserves or enhances the character and appearance of the area. London Plan policies D4, D5 and D6 and CPG (Design) also seek to secure high quality design.

### Site description

- 12.2 The site is located on the eastern side of Kentish Town Road 100m north of Camden Town Underground station. The majority of the site is occupied by a single building, Grand Union House, which forms a slender plot of approx. 1800sqm. The single storey building at No.16 Kentish Town Road which adjoins the site is also included. Grand Union House forms the western edge of a wider 1980's campus designed by Nicholas Grimshaw & Partners, which occupies the urban block defined by Kentish Town Road, Camden Road and Regent's Canal. To the rear of the site is the service yard and car park of the neighbouring Sainsbury's store.
- 12.3 The building is not listed but is adjacent to the Grade II listed Sainsbury's superstore and terraced dwellings at Grand Union Walk, both part of the Grimshaw development. As outlined in the heritage section above Officers consider that proposals do not harm the setting of the heritage assets within the vicinity of the site.



*Figure 13: Aerial view of Existing buildings fronting Kentish Town Road*

### Surrounding Townscape and Views

- 12.4 There are no designated views crossing the site. It is however in a prominent location and some key townscape views include:
- Looking south along Kentish Town Road from Kentish Town bridge
  - Looking north from Britannia Junction along Kentish Town Road
  - Looking east along Buck Street
  - Looking north east along Inverness Street
  - Kinetic views along the Regent's Canal

The views tested as part of the application (already discussed in detail in the heritage section above) show that the development would sit comfortably within the street, and the wider townscape of Camden Town and canalside development.

- 12.5 The architecture of Camden Town is eclectic, with a complexity and richness of building styles and urban uses. The background of Victorian London brickwork,

terraced house and warehouse is juxtaposed against Art Deco, British Modernism, Post-modernism and all the complexity of Camden High Street with its colourful buildings and exuberant signage. Nicholas Grimshaw's Sainsbury's campus is an important example of 1980s high-tech architecture. Together, these different architectures create a very particular and assertive urban environment.

- 12.6 The buildings surrounding the site are of various eras, styles and heights. The Victorian and early 20th Century buildings in the centre of Camden are largely 3-4 storeys. Development around Britannia Junction, dating from the early 20th Century, is taller. A collection of commercial buildings on corner sites are 4-5 storeys.
- 12.7 To the south east of the site there is the familiar grain of brick-built London townhouses along Camden Road and beyond. To the west are the canal-side warehouses between Hawley Street and the Regents' Canal that were later transformed into the TV-am studios by Terry Farrell, an important piece of 1980's Post-Modernism. Larger offices and low warehouses cluster around the canal.
- 12.8 The section of Kentish Town Road directly south of the Kentish Town canal bridge is modern in character with Grimshaw's Grand Union House occupying the street frontage on the eastern side of the road. A modern residential building at 29-31 Kentish Town Road, directly opposite the north end of the site, is 5 storeys, and the adjoining development at Mansion Lock House, 13 Hawley Crescent, is 6 storeys tall. The Hawley Wharf development on the northern bank of the canal ranges from 5 to 9 storeys, and presents a 6 storey building facing Kentish Town Road closest to the site.

Site Appraisal:

- 12.9 At ground floor there are two commercial units and the office entrance; however, this level is otherwise unenclosed and dominated by undercroft car parking and a loading dock. Below Grand Union House is a basement car park used by Sainsbury's customers and a UKPN room below the current Grand Union House entrance. The site also includes a one-storey building, 16 Kentish Town Road, which was intended as a crèche when it was constructed as part of the Grand Union campus.
- 12.10 With the existing ground floor of Grand Union House occupied by loading bays and car parking and security infrastructure, the long, blank elevation along Kentish Town Road creates an uninviting frontage to the street. The resulting environment is unwelcoming to pedestrians and cyclists, and has increasingly come to foster anti-social behaviour.
- 12.11 Grand Union House was designed for light-industrial or office use above the first floor, but the spatial arrangement never supported light industrial use. The building was instead carved up into awkward office spaces squeezed between low mezzanines. The building does share certain engaging characteristics with its predecessor the ABC Bakery, most notably its length and the horizontal rhythm of the facade. However, the building's façades lack generous and openable fenestration and its entrances are restricted.

- 12.12 The service yard to the rear creates an inhospitable pedestrian environment. It is overlooked only by the first floor windows of Grand Union House; Grand Union Walk and Sainsbury's offer no windows to the courtyard.
- 12.13 There is an opportunity to significantly improve the contribution this site makes to the townscape through:
- infilling the undercroft parking at ground floor to create an active and engaging street frontage;
  - improving the pedestrian route through the Sainsbury's service yard; and
  - creating a high quality piece of architecture that respects the existing listed buildings and adds to Camden's eclectic and ambitious architectural context.
- 12.14 The scheme has sought to address the opportunities discussed above. The proposal is a building that aims to be an exemplar of sustainable, low carbon development based on the key principles of adaptive reuse.
- 12.15 The design takes a holistic approach to workspace addressing wellbeing, ecology and biodiversity by ensuring access to landscape, daylight and fresh air. By integrating workspace interiors, architecture and urban landscaping, the proposals aim to create a new social and ecological place.
- 12.16 The re-imagining of Grand Union House seeks to complete the Grimshaw campus through creating a piece of exceptional architecture that works with the inherent characteristics of the existing building and responds to the material and architectural legacy of the listed Sainsbury's building and homes of Grand Union Walk.

#### Ground Floor activation

- 12.17 The Kentish Town Road elevation of the proposed building seeks to activate the blank frontage of the existing Grand Union House through the provision of commercial uses at ground floor level which open onto the street. The proposed use aligns with the character of Camden through providing spaces for SMEs and emerging businesses which contribute to the innovative economy of Camden Town.
- 12.18 Three retail units are included at the south end of the site. The first two are on the ground floor of the office building, occupying the double height space beneath the existing first floor slab. There is potential for the adjoining retail unit to be linked to the workspace lobby. The third retail unit occupies the ground floor of the new four storey residential building.
- 12.19 The two main entrances to the offices are from Kentish Town Road either side of the vehicle exit from the Sainsbury's service yard. These large glazed entrance sliding doors will help to create activity on the street, with people entering and leaving the office throughout the day, and will be visually more engaging than

the current condition. As mentioned in the previous section a condition (15) will secure an activation strategy.

- 12.20 Additional entrances are provided below the greenhouse, and a set of large sliding doors for occasional use, will open directly from Kentish Town Road into the main ground floor work space adding extra flexibility and dynamism to the building.
- 12.21 Officers would be concerned that given its highly glazed appearance that the site could become cluttered with deemed consent adverts that would detract and undermine the character and appearance of the proposed building. Therefore condition 35 secures that no advertisements shall be placed on the building externally or internally, so that they are visible from outside the building, until details of those advertisements have first been submitted to and approved in writing by the local authority.

#### Public realm (existing service yard) and site connectivity

- 12.22 It is noted that the public realm around the existing building is poor, with limited pedestrian access through the site and priority is given to vehicles and service/delivery functions. The proposal seeks to improve the route from Kentish Town Road to Camden Road, through widening the pavement in the underpass of the commercial building to provide more generous and inviting space for pedestrians and would improve pedestrian flow along the pavement. The underpass will be clad in reflective tiles to help to brighten the route and render it more inviting compared to the present poorly lit and defensive elevation and underpass. A new crossing aligned to the underpass is also proposed which will improve the link from Camden High Street to Camden Road, although this is only indicative and would be subject to separate consultation by the highways team so should not be given weight.
- 12.23 The increased activity on the street frontage from the active ground floor units will draw activity up the eastern side of Kentish Town Road. This will significantly enhance this section of Kentish Town Road and foster a better connection with the southern end of Kentish Town town centre, Regent's Canal and Camden Gardens. This improved link is very positive in the context of the proposed Camden Highline that would begin at Camden Gardens if permission is granted.
- 12.24 The scheme was revised to show new trees along the pavement of Kentish Town Road, although for clarity this is only indicative of what good come forward in the future. This is not part of the current application and would require a separate consultation if it did come forward. Although some planting is proposed to the rear of the site, it is acknowledged that there are opportunities to further improve the visual environment of the Sainsbury's service yard through greening should be taken to further enhance the pedestrian experience. The planting of new street trees and planted beds are only indicative as they sit outside of the red line and the highways team would again have to go through a separate process to consider this, so these street alterations should not be given weight.

#### Scale and massing

- 12.25 The proposed building is six storeys overall (21.65m), which relates well to the immediate and wider townscape. This height follows a pattern of increasing building height moving north up Kentish Town Road away from Britannia Junction, and is in keeping with the scale of recent new development in the area, including the 5-9 storey buildings of Hawley Wharf and the 6 storey buildings directly opposite the site.
- 12.26 The new proposal for Grand Union House is a similar height to the 2018 scheme, which was also 6 storeys. The primary difference in terms of massing relates to the form of the top floor: by replacing the sawtooth roof form of the 2018 scheme with a flat roof, the maximum building height is reduced by approximately 2.25m.
- 12.27 The primary 6 storey element of the proposal comprises a long, straight elevation which responds to the existing urban grain and character of this part of the townscape, which has been occupied by a singular horizontal building on this site for most of the last century.
- 12.28 The massing is, however, more dynamic than the building that currently exists on site. The top floor zig-zags in plan stepping backwards and forwards from the front building line, and will add visual interest to the top of the building. It will also contrast with the simplicity of the long Kentish Town Road elevation without becoming overbearing. This variety in form will distinguish the upper floors from the body of the building and will soften the top of the building as experienced at street level, reading as a separate roof form.
- 12.29 Thought has been given to the way the building relates to its near neighbours as well as how it fits within the context of the wider area. The building steps down to 5 storeys towards the south of the site, maintaining good daylighting to Barnes House, also 5 storeys. The building steps down again to 4 storeys, reflecting the height of the neighbouring Georgian terrace immediately to the south. This four storey element at the western end signals the end of the main building and the change of use from office to residential.
- 12.30 The overall massing of the proposed development will result in a well-articulated composition, responding positively to the shape of the site and its existing context.

#### Detailed design/Materials

- 12.31 The building envelope explicitly references Grimshaw's metallic material palette and facade composition. The proposed façades use a material language of glass and aluminium which reflects materials pioneered and refined by the high-tech architects of the 1980s. This is considered a successful response to the immediate context and architectural language of the heritage assets and welcomed in this proposal.
- 12.32 The east and west façades are fully glazed curtain wall systems of varying transparency and reflectivity, both creating a lightweight appearance of the

building, and enlivening the façade by providing reflections of adjacent buildings and offering glimpsed views into the internal spaces.

- 12.33 In contrast, the northern flank wall is almost entirely solid, clad in subtly reflective corrugated panels of anodised aluminium. This relationship of blank facade to fully glazed facade, employed again in the wrapping of the core to the south east, emphasises the thinness of the building envelope, which is a distinctive part of the design.
- 12.34 The top floor is composed as simple alternating plains of solid aluminium and glass, oriented to maximise daylight but minimise solar gain. Through their reflectivity will together create complex and ever changing optical effects. The aluminium will be natural anodised, and will offer a blurred reflection of the site surroundings, weather and sunlight.
- 12.35 The glazed bridge link will incorporate a glasshouse garden of exotic plant species, which will add a significant degree of visual interest from the street, and create an engaging elevation.
- 12.36 The proposed design is considered to be a high quality design response that responds well to the architectural language and character of the surrounding high-tech buildings and local context.
- 12.37 While the highly glazed building has the potential to have further excitement and interest added through careful approaches to lighting. A condition (condition 6) is attached to secure a lighting strategy which will also prevent excessive impacts.



*Figure 14: CGI view from Buck Street towards Grand Union House*

- 12.38 The residential entrance/building is located to the southern end of the Kentish Town Road elevation, which is considered an appropriate location given the more domestic character of this street on the upper floors. The facade of the residential element steps forward from Grand Union House clearly separating its volume from the office building. It adopts the architectural language and materiality of Grand Union House, echoing the grid expression of the office element whilst distinguishing it through the use of corrugated anodised aluminium and punched windows.
- 12.39 Like the Grand Union Walk housing it also playfully adapts the language of its larger neighbours in response to domestic scale interiors: the dwellings add a finer, more domestic grain and expression, with a curved roof profile, the clear division between individual townhouses and the inclusion of other natural materials, such as timber balconies.
- 12.40 At ground floor level, the proposed glazed retail facade and residential entrance add activity and visual interest, which is welcome.



### Sustainable design

- 12.41 The existing concrete structure is to be retained up to first floor level and reused to minimise waste and embodied CO<sub>2</sub>, which is supported.
- 12.42 The facades are composed of a precise repeating horizontal grid that will provide a thin but high-performance external envelope, employing solar control glass to avoid overheating. Generous opening vents are incorporated within the grid across the facade, supporting a mixed mode ventilation strategy.
- 12.43 The use of metallic and reflective facade materials in combination with engineered timber floor decks (such as CLT) and soffits is proposed as an evolution of original high-tech logic. Low carbon engineered materials such as CLT or GLT become part of the 'natural' lexicon of high-tech materiality. Sustainability is discussed in more detail in a later section.

### Design Review Panel (DRP)

- 12.44 The proposals were considered by Camden's Design Review Panel at pre-application stage on 29 January 2021 in the form of a chairs review given that the previous scheme had been previously gone (October 2018). The formal written report was issued February 2021 (attached at Appendix 2).
- 12.45 The report's summary section is provided below:

#### *Summary*

*The panel applauds the ambitious work undertaken by the design team to create a new type of workspace for Camden, placing wellness, sustainability, landscape, ecology and biodiversity at its heart. Thoughtful refinement of the design following the appointment of a new design team is supported, and the panel finds significant improvements have been made to the proposed landscape and public realm. The design team are now encouraged to consider any further physical and visual and connections the scheme can create to improve this part of Camden. In particular, the panel suggests there may be potential to open up the route between St Michael's Church and the Leyland DIY store. The quantity and quality of street and internal planting is commended, and the panel would like to see careful and realistic consideration of how this will be maintained throughout the building lifespan. Further activation of the ground floor should be explored, with the panel encouraging greater permeability, especially along the building's northern leg. The panel urges the applicant team consider its public offer and explore the viability of creating community space within the ground floor. Amendments to the roofscape and façade design are welcomed. Careful testing of the glazed facade's promised transparency and potential combination of glass, open and mesh panels is vital. The residential element requires further work so that its ambition aligns with the rest of the proposals. It appears compressed, and the possibility of greater generosity in its layout and height should be tested so its architectural language feels coherent with the rest of the scheme.*



- 12.46 The proposals presented to the Design Review Panel are largely the same, however the residential block's detailed design was revised in line with their feedback, the scheme no longer removes the on-street car parking bays and the pavement planting is now indicative; both these elements are outside of their red line. An Active Frontage Strategy is to be secured (condition 15) which will promote greater interaction with the street along the northern end of the building.

### Conclusion

- 12.47 The application site is located in two conservation areas and while the site does not contain any listed buildings; it is located close to a number of listed buildings as detailed above. The proposals would result in the loss of the existing buildings on site; however, these are considered to contribute little to the street scene or townscape. The proposed replacement building responds to the scale and language of the surrounding area, and is considered to provide a high standard of design and finish.
- 12.48 Assessing the development overall, it takes the opportunity to make significant improvements to the current buildings and their immediate surroundings in a way which would enhance the character and appearance of the area. This high-quality design response draws on surrounding influences, responding creatively to the site and its history, and is welcomed. The proposals show generosity to the public realm and would help to activate and enhance this part of the town centre improving routes around, and through, the site. Entrances directly onto the street will further help to activate Kentish Town Road. The design is innovative and engaging and its transparent and reflective façade would enhance the character of the existing street. The proposal overall will relate well to its context.
- 12.49 Overall, the proposals are considered to be in accordance with policies D1 and D2 of the Camden Local Plan.
- 12.50 The success of the scheme will depend on the detail and execution of the final build, therefore the Council recommend that the architect is retained, this will be secured via a S106 legal agreement.

## **13 Landscaping and trees, Open space**

### Open space contribution

- 13.1 The Local Plan requires an appropriate contribution to open space, with priority given to publicly accessible open space. Policy A2 gives priority to securing new public open space on-site, with provision of space off-site near to the development acceptable where on-site provision is not achievable. If there is no realistic means of direct provision, the Council may accept a financial contribution in lieu of provision.
- 13.2 CPG Public Open Space states that developments exceeding 1,000sqm in floorspace will be expected to contribute towards open space and play facilities,

as will schemes of 11 or more additional dwellings, so only the commercial element triggers a requirement.

- 13.3 The CPG describes public open space as 'open space that can be used and enjoyed by all the community. It is distinct from privately accessible open space such as private or communal gardens or balconies that do not ordinarily provide access for everyone'.
- 13.4 Policy A2 (part m) applies a standard of 0.74m<sup>2</sup> per occupant for commercial developments and 9m<sup>2</sup> per occupant for residential in terms of on-site provision. However as fewer than 11 residential units are proposed the residential contribution of the calculation is not triggered.
- 13.5 The net commercial uplift in the scheme is 3,813sqm. Based on an employment density of 1 worker per 13sqm, there would be around 293.3 additional occupiers. This would equate to a requirement of 217.1sqm overall (0.74sqm *open space requirement* x 293.3 *additional occupiers*).
- 13.6 No new public open space is provided that meets the requirements set out in CPG Public Open Spaces as part of the proposals. Policy A2 acknowledges that achieving the full amount can be challenging, particularly on sites within densely built up parts of the borough such as this, where the majority of the site is already built over. There is also no existing public open space on site at present, and the building occupies almost the full footprint and this structure is being reused. It would not be feasible onsite and there are limited options for offsite provision in a reasonable distance. Therefore, a financial contribution is required towards the provision, maintenance and improvement of open space. A financial contribution of £58,603 would be secured by S106 legal agreement towards public open space which includes capital costs and maintenance costs for 10 years.

#### Landscaping and trees

- 13.7 There is a lack of public open space and soft landscaping features within the site boundary or surrounding it. As such, the proposed development would not necessitate the removal of existing trees or landscaping and it is not necessary to secure details of tree protection measures.
- 13.8 The proposal includes the introduction of new soft landscaping through green roofs is welcomed. The development would also incorporate an internal greenhouse within Grand Union House. The planting to the pavement along Kentish Town Road is indicative, but there are also areas of green indicated to the area of the service yard between the under-croft and church. Full details of the planting and maintenance across the scheme would be secured by condition 17.

#### Nature conservation and biodiversity

- 13.9 Within the submitted sustainability statement, it states that an extended Phase 1 habitat survey were carried out on the existing site. The survey included an external inspection to assess the potential of the existing building on site to support roosting bats. The site study concluded that the existing site is of

negligible ecological and biodiversity value and no roosting bats were discovered.

13.10 While the site is not within a Site of Importance for Nature Conservation (SINC) it is close to Regent's Canal which is a SINC. The Council's Nature Conservation Officer has reviewed the development and does not consider it to have a negative impact on this SINC. The only habitat currently found on site is building and hardstanding, which has very little ecological importance. The proposed loss of this "habitat", therefore, presents no constraint and no mitigation will be required.

13.11 The proposals present the opportunity to incorporate ecological enhancements and improve the biodiversity at an otherwise innocuous urban site. Creating new habitat and improving opportunities for fauna which may be at the site, such as establishing an indoor greenhouse and roof planting, will be in line with the London Plan and the London Borough of Camden Local Plan. Detail of the blue and green roofs and the maintenance of the planting is secured by conditions 10 and 17. New flora planted should preferably be native and of local stock where possible.

13.12 The site has potential to incorporate further enhancements by incorporating bird and bat boxes. Condition 19 has been attached securing details of bird and bat box locations and types and indication of species to be accommodated.

## **14 Impact on neighbouring amenity**

### Policy review

14.1 Camden Local Plan policies A1 and A4 and the Amenity CPG are relevant with regards to the impact on the amenity of residential properties in the area. Any impact from construction works is dealt with in the transport section.

### Daylight and sunlight

14.2 A Daylight, Sunlight and Overshadowing Report has been submitted as part of this application prepared by Point 2 Surveyors Limited which details any impact upon neighbouring properties.

14.3 The methodology and criteria used for the assessment is based on the approach set out by the Building Research Establishment's (BRE) guidance "Site layout planning for daylight and sunlight: A guide to good practice 2011". The report makes use of several standards in its assessment of surrounding buildings which are described in the BRE guidance:

- Vertical Sky Component (VSC) – This relates to daylight on the surface of a window. A measure of the amount of sky visible at the centre of a window. *The BRE considers that daylight may be adversely affected if, after development, the VSC is both less than 27% and less than 0.8 times (i.e. a reduction of more than 20%) its former value.*
- No Sky Line (NSL), also known as Daylight Distribution (DD) – This relates to daylight penetration into a room. The area at desk level ("a working

plane”) inside a room that will have a direct view of the sky. *The DD figure can be reduced by up to 20% before the daylight loss is noticeable (i.e. retain 0.8 times its existing value).*

- Average Daylight Factor (ADF) – This is a calculation which determines the luminance in a room. It makes assumptions including glazing transmittance, the glazed area of the windows, the total area of the room surfaces, and the angle of visible sky reaching the windows. This methodology is not prescribed for existing buildings in the guidance, but it can be a useful informative given the level of accuracy entailed, and taking account of the assumptions made. *The BRE considers appropriate minimum levels of ADF to be 1% for bedrooms, 1.5% for living rooms, and 2% for kitchens.*
- Annual Probable Sunlight Hour (APSH) - A measure of the amount of sunlight that windows of main living spaces within 90 degrees of due south receive and a measure of the number of hours that direct sunlight reaches unobstructed ground across the whole year and also as a measure over the winter period. The main focus is on living rooms. *The BRE considers 25% to be acceptable APSH, including at least 5% during the winter months. Impacts are noticeable if less than these targets, and sunlight hours are reduced by more than 4 percentage points, to less than 0.8 times their former value. It recommends testing living rooms and conservatories.*

14.4 The overshadowing of open spaces is assessed by considering any changes to surrounding outdoor amenity spaces. A Sun Hours on Ground assessment has been undertaken which uses the BRE methodology. *The BRE recommends at least half (50%) of the area should receive at least two hours (120 mins) of sunlight on the 21st March, and the area which can receive some sun on the 21st March is less than 0.8 times its former value.*

14.5 The assessment shows significant impacts on several individual properties in the surrounding blocks. The existing site is in most parts, reflective of the general urban grain and street width to building height ratios in the area, although there is an unusual low-rise block (no. 16) out of character with the otherwise dense urban character. This means that surrounding blocks currently receive uncharacteristically generous levels of light. It is an inevitable consequence of the built-up urban environment that daylight and sunlight will be more limited in dense urban areas, such as surrounding the application site. In such situations there may be many factors to be considered in addition to daylight and sunlight contributing to overall amenity for occupiers of existing buildings. The BRE notes that while the Guidance offers numerical target values in assessing how much light from the sky is blocked by obstructing buildings, *‘these values are purely advisory and different targets may be used based on the special requirements of the proposed development or its location’.*

14.6 The daylight sunlight report identifies several properties that are affected by the proposal. This section of the report discusses the impacts on the following properties:

- 32-52 Camden Gardens (Camden Street)
- 1-28 Camden Gardens (Camden Street)
- Grand Union Walk (overshadowing of roof terraces)

- St Michael's Church
- 22-26 Camden Road
- Barnes House, 9-15 Camden Road
- 3- 5a Camden Road
- 11-19 Kentish Town Road
- 21-23 Kentish Town Road
- United Reformed Church
- 25-27 Kentish Town Road
- Former Hawley Infant Nursery School
- 29 Kentish Town Road
- 31 Kentish Town Road
- 33 Kentish Town Road

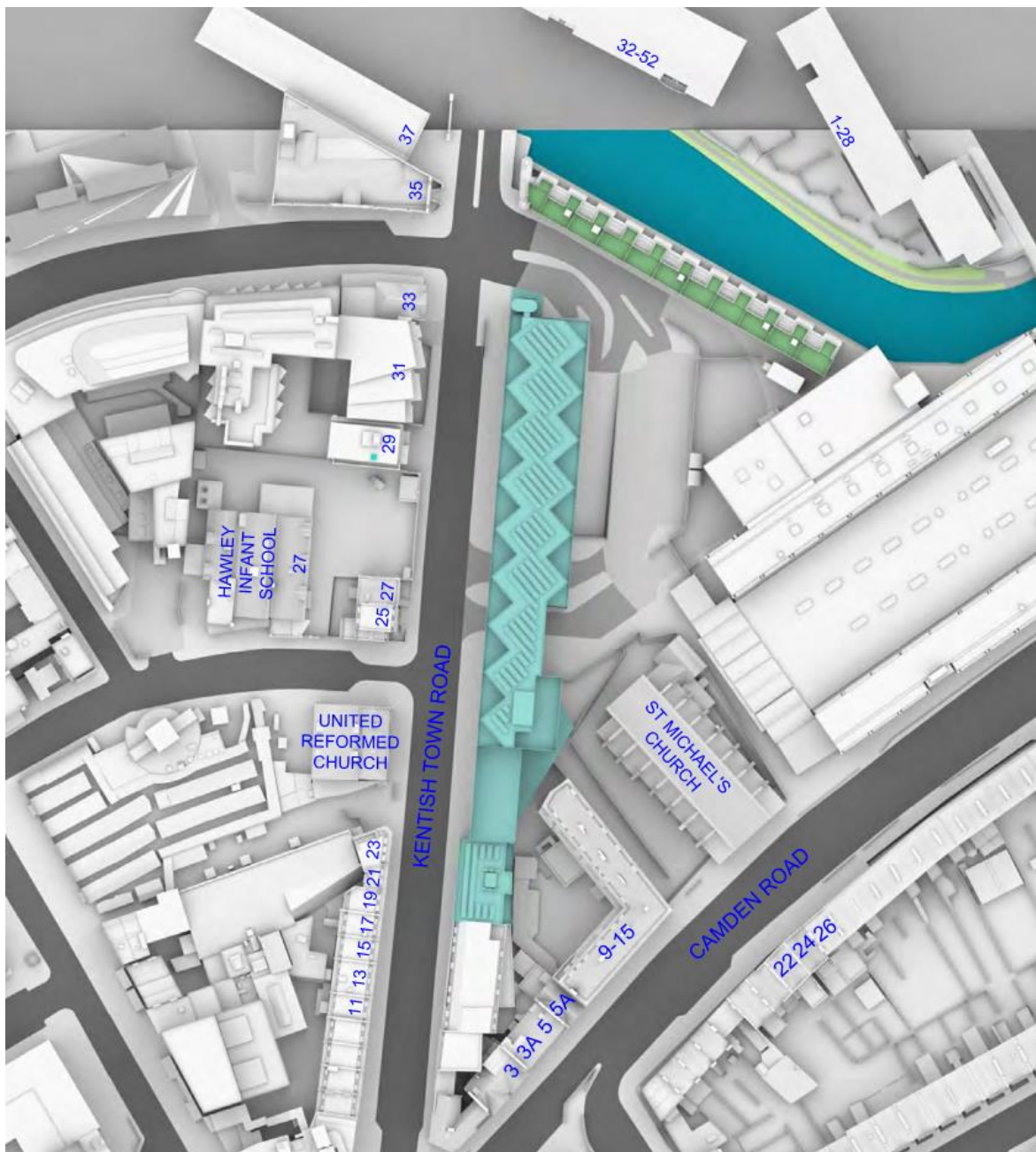


Figure 15: Nearest relevant properties to the application site

#### 32-52 Camden Gardens (Camden Street)

- 14.7 Opposite Grand Union Walk and on the north side of the canal, these properties would fully comply with BRE targets and continue to have an open aspect over the canal. They would retain excellent daylight levels with VSC all more than 27% and no noticeable impact on VSC or NSL. Excellent sunlight levels are retained on the properties far exceeding BRE targets. The impacts are all fully BRE compliant and there will be no noticeable impact on daylight or sunlight.

#### 1-28 Camden Gardens (Camden Street)

- 14.8 Another block opposite Grand Union Walk and on the north side of the canal, these properties would also fully comply with BRE targets and continue to have an open aspect over the canal. They would retain excellent daylight levels with VSC ranging between 19.61% and 33.83% and relative reductions all under 5.86%. There would be no noticeable impact on VSC or NSL. Excellent sunlight levels are retained on the properties as well, far exceeding BRE targets. The impacts are all fully BRE compliant and there will be no noticeable impact on daylight or sunlight.

#### Grand Union Walk (roof terraces)

- 14.9 These houses are directly north of the development, but have no windows facing south – instead there is a blank south elevation (with emergency access doors) facing the proposed development. The homes have roof terraces, with some roof lights on the roof terraces. The impact of overshadowing on these terraces has been tested. There is almost no change between the existing and proposed situations, with more than half continuing to receive more than 120 mins of sunlight on 21 March (see areas in yellow below).

#### St Michael's Church

- 14.10 The impacts on the church are relatively minor and three rooms within the church were tested. Although the majority of windows are BRE compliant, all rooms experience some minor exceedances. One room experiences minor breaches of VSC, between 24% - 29% reductions, to 2 of its 26 windows. However, many windows do not experience any alteration in VSC so the level of change to this room is unlikely to be noticeable. Furthermore, the room is fully NSL compliant. One room is fully VSC compliant but has a reduction in NSL of 32.1%, however the retained level will be more than 50%. The remaining room (R1/10) is fully NSL compliant and experiences a very minor alteration in VSC of only 22.52%, compared to the recommended 20%.
- 14.11 Two rooms are within 90 degrees of due south, one is BRE compliant, and the remaining window only experiences a minor excess reduction in winter sunlight (25% reduction) and the actual retained level is 3% rather than the target 5%. Overall, the impact on light of the church is only a minor adverse effect, especially given its primary function and siting within an existing tight urban grain, and is acceptable.

#### 22-26 Camden Road

- 14.12 Opposite the church and Barnes House on Camden Road, these properties would fully comply with BRE targets and continue to have an unusually open



aspect. They would retain excellent daylight levels with VSC all more than 27% and no noticeable impact on VSC or NSL. There will be no noticeable impact on daylight or sunlight.

Barnes House, 9-15 (odd) Camden Road



*Figure: 16 – Barnes House with Grand Union house in the left foreground*

14.13 To the south east of the site, this block has flats on upper floors with the Mind charity and rear of commercial units on the ground floor. The existing access decks have an impact on the alterations in light to this building because they reduce sky visibility and force the windows beneath to get daylight and sunlight at a shallower angle, directly across the development site. This means that even smaller increases in height on 16 Kentish Town Road are likely to have notable impacts. Because of this, the BRE acknowledges that balconies and decks on existing buildings can be an unreasonable limitation upon a developer and proposes removing the decks for the purpose of the analysis.

14.14 In line with BRE guidance the assessment was done with and without the decks. This demonstrates whether the building itself is a significant limitation or whether impacts come primarily from the design of the neighbouring building.

- 14.15 A total of 76 windows serving 66 rooms were tested. With balconies in place, 49 rooms and associated windows (74%) are fully BRE compliant in terms of any VSC and NSL daylight alterations.
- 14.16 Of the remaining 17 rooms, whilst there are exceedances of VSC reductions of between 21.16% to 50.06%, 15 of them are fully NSL daylight compliant which means that daylight penetration into the actual room will meet BRE Guidelines. The two rooms that exceed the NSL reductions are a kitchen (R6/102) and a bedroom (R33/102). The reductions only marginally exceed the 20% target, being between 22.6% and 25.7%. Furthermore, both still retain good daylight distribution within the rooms of more than 70%. Given the location, close to the boundary in an urban area with a tight urban grain, these impacts are considered notable but reasonable. The impacts on this block are also exacerbated by the presence of the access decks on the building.
- 14.17 Testing without the decks, in line with BRE guidance, 62 rooms and associated windows (94%) are fully BRE compliant in terms of any VSC and NSL daylight alterations.
- 14.18 Of the remaining four rooms, two are small kitchens on the second floor (R6/102 and R9/102), in the corner and overlooking the deck access. While they both exceed the relative reduction target of 20% (25.23% and 22.10% respectively) it is only marginally and they both retain VSC levels of 19.09% and 22.49% which are acceptable in the urban context. They also suffer no noticeable impact on the light penetration into the room with relative reductions below 0.5% in compliance with BRE, and both maintain excellent daylight distribution of more than 95% of the room.
- 14.19 The other two rooms (R33/102 and R33/103) are bedrooms at second and third floor and are the closest windows to the development. The VSC reductions of daylight on both the windows exceed the target. The room on the second floor has a VSC reduction of 34.36%, retaining a VSC of 14% which is low, albeit on the boundary in a tight urban grain. However, this room also retains good daylight distribution at more than 70% of the room area. The room on the third floor is less impacted with a VSC reduction of 25.32%, retaining a VSC in excess of 18% which is considered appropriate for the urban context. Furthermore, it is BRE compliant in terms light inside the room with only a 3% NSL reduction and retaining more than 90% of the room area. Both the second and third floor rooms also retain good radiance daylight within the bedrooms, retaining ADFs both exceeding the target 1%.
- 14.20 With balconies 16 of the rooms assessed (70%) are fully BRE compliant with APSh sunlight. only The BRE only advises testing living rooms and conservatories, although it advises caution blocking too much sunlight. The remaining 7 rooms that do not meet the BRE criteria are all bedrooms or kitchens, and all exceed the 5hrs winter APSh target.
- 14.21 It is the decks on the existing building that restrict the higher summer sun, and when tested without them in place, 23 rooms are fully BRE sunlight compliant.



14.22 In terms of overshadowing, the plan below illustrates that on the 21st of March the courtyard will experience no discernible change in sun-on-ground. The left shows the existing and the right shows the proposed development, with the yellow areas showing which areas receive more than 120 mins of sun-on-ground.

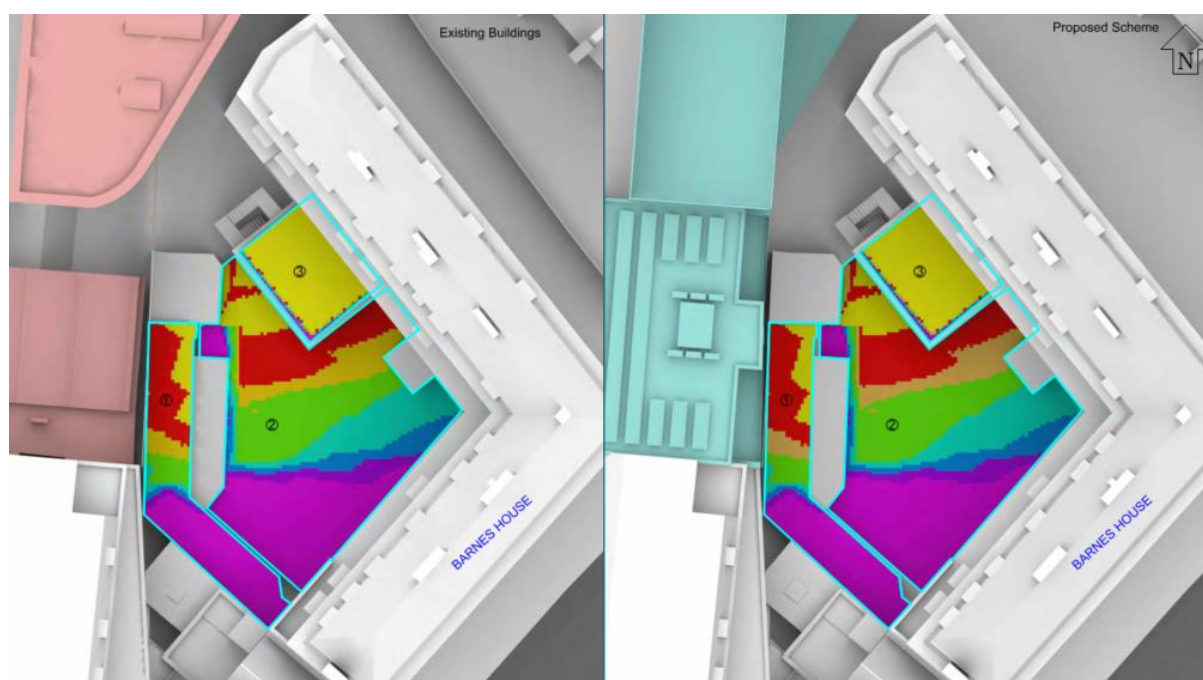


Figure 17: Sun hours on ground (on 21 March) for Barnes House

14.23 Whilst there are daylight impacts on the block, they are focussed on the second and third floor, on the edge of the block closest to the development and right on the boundary. The BRE 'Without Balconies' analysis illustrates that, for the majority of rooms within Barnes House, it is the presence of the deck access that emphasises the impact. Overall, the impacts on the block are considered acceptable, especially taking account of the urban context and the limitations imposed on the building by its own deck access.

### 3- 5a Camden Road

14.24 Whilst there are some low light values retained at these properties, the existing light values are already very low in several cases due to the tight urban grain that already exists. As a result, the relative reductions are all very low – VSC reductions are all between 0 and 8.32% and well within the 20% BRE target. Similarly, the NSL reductions are within the 20% target and range between 0 and 12.3%. The impacts are all fully BRE compliant and there will be no noticeable impact, nor would there be any loss of sunlight.

### 11 to 19 Kentish Town Road

14.25 On the opposite side of Kentish Town Road, this three-storey row of terraced houses is in residential use above ground level. All windows and rooms serving residential units above ground are fully VSC and NSL daylight compliant. Similarly, of the site facing windows orientated within 90 degrees of due south, all are fully BRE compliant for sunlight APSH alterations. The occupants of these buildings will not notice any change to their levels of sunlight amenity.

### 21 and 23 Kentish Town Road

14.26 These two buildings are between 19 Kentish Town Road (see above) and the United Reform Church (see below). These do not appear to be occupied and are not registered with council tax as residential properties so they have not been analysed for their impacts. Nonetheless, in case they become residential in future, officers have considered the likely impacts based on their location in the street and being opposite the lower part of the proposed development.

14.27 Number 19, adjacent to the south, retains VSC values from first floor and up of between 18.26 and 34.28%. The Church building on the north side, and opposite higher elements, retains VSC values from first floor and up of between 18% and 23.2%. The buildings either side of the properties both retain values in excess of 18% VSC, which is acceptable and common for this urban context, and these two buildings are therefore likely to share similar retained levels. Should they come into residential use in future, the impacts would be acceptable and proportionate to their context.

### United Reformed Church

14.28 The church, opposite the site, is not residential and so does not normally need to be tested under BRE guidance. However, the assessment demonstrates that panes facing the development retain reasonable VSC levels for the context. Furthermore, all rooms and associated windows are fully BRE compliant in terms of any APSH sunlight impacts. Overall, the development will have only a minor adverse impact, especially given its primary function and existing urban grain, and is acceptable.

### 25 and 27 Kentish Town Road



*Figure 18 – 25-27 Kentish Town Road in context and photograph*

14.29 The buildings are planned for redevelopment as part of the new Camden Town tube station entrance. However, there is no Transport Works Act Order (TWAo) currently in place and so limited weight should be attached to the future redevelopment at this time.

- 14.30 Within the residential flats at 25-27 Kentish Town Road, there are a total of 27 windows serving 17 rooms. Of the 17 rooms, three of them and their associated windows are fully BRE compliant in VSC and NSL alterations (R2/699, R1/703, R1/722).
- 14.31 Of the remaining 14 rooms, five retain acceptable VSC values for the context, in excess of 18% (R2/701, R2/702, R2/703, R1,711, R1,712) with the south facing windows exceeding BRE sunlight targets. They also retain good daylight penetration into the room, with all but one (which retains 49% daylight distribution in the room) retaining NSLs in excess of half the room, ranging from 50% to 95% NSL.
- 14.32 Six more rooms (R3/699, R1/700, R2/700, R1/702, R1/709, R2/710) would experience VSC relative reductions ranging from 31.16% to 36.56%. However, they would experience acceptable daylight penetration into the room with more than 50% NSL retained in each case, and minor ADF actual reductions of less than 0.5 percentage points.
- 14.33 Of the three remaining rooms, Room R1/710 is a very small fanlight above the entrance door so will not impact on living space quality.
- 14.34 R1/699 is a small window next to the door at basement level, set back at the side of the building. Windows lower to the ground tend to experience worst relative reductions as they tend to have more existing obstruction. In this case, the lower starting position means that even though the relative VSC reduction is 32.15%, the actual reduction is only 4.73 percentage points. The existing daylight distribution is already below 50% of the room and the actual reduction in ADF is 0.07 percentage points.
- 14.35 Room R1/701 is a first-floor window, also set back at the side of the building. It suffers a notable VSC relative reduction of 33.75% and retains a VSC of 16% which is fairly low for this urban context, normally expecting around 18% or above. The daylight distribution is also under 50% retained NSL. The development is likely to have a significant adverse effect on the daylight to this room, however, it would continue to receive good levels of sunlight. It would receive 30 APSH throughout the year compared to the BRE recommended 25%, and 8% APSH during the winter months compared to the BRE recommended 5%.
- 14.36 Most of the 16 assessed rooms within these buildings are fully BRE sunlight compliant. There are six rooms that experience relative reductions in excess of the 20% BRE target, ranging up to 41.2%. However, the shortfalls in the absolute sun hours is minimal and the six rooms retain good levels of sunlight throughout the year of between 18-24% absolute APSH, with winter APSH ranging from 4% to 7%, compared to the 5% target. There will be an impact on sunlight, but it will be minimal given the context and is acceptable.
- 14.37 Overall, these two buildings do suffer some notable impacts, however, many would still receive good levels of daylight and sunlight. Of the worst affected, two

are very small windows next to or above entry doors and would offer little to quality of daylight in any event. The more severe impact is on the first-floor room, set back to the side of 25 Kentish Town Road. The impacts on daylight to this room would be noticeable and greater than would normally be expected in this current urban context, however it would continue to receive more than the recommended levels of direct sunlight which would somewhat mitigate the impact on amenity.

#### Former Hawley Infant Nursery School

14.38 The building is planned for redevelopment as part of the new Camden Town tube station entrance. However, there is no Transport Works Act Order (TWAO) currently in place and so limited weight should be attached to the future redevelopment at this time. However, the former Hawley Infant School building not residential and although education uses can be more sensitive to light impacts than commercial uses, the building is currently vacant after the school moved to a new building in Hawley Road.

14.39 Nonetheless, most rooms and associated windows are fully BRE compliant in terms of any VSC and NSL alterations. The three remaining former classrooms are all NSL daylight compliant and are each served by multiple windows, of which 1 or 2 breach VSC guidance. In consideration of the full NSL compliance and the fact that these rooms are also served by at least one other BRE VSC compliant window, the overall effect to this building is minor were a school use to recommence.

#### 29 Kentish Town Road



*Figure 19 – 29 Kentish Town Road in context and photograph*

14.40 This is on the opposite side of Kentish Town Road and is student accommodation above ground level. It has been tested although it will have transient and regularly changing occupancy, and periods of inoccupancy outside the academic year. The front of the building is heavily glazed even with reductions in daylight on the window, the large window means the internal quality



of the space is less impacted. The spaces served by the windows are studios and whilst they have VSC reductions above the target 20%, all but one window retain levels in excess of 18% VSC, good for this urban context, with the retained levels between 19.47% and 31.25% VSC.

14.41 The one remaining window is on the second floor and set below a projecting balcony, with another projecting balcony directly to the right, both of which restrict its access to the sky meaning increase in height opposite is likely to have a disproportionate impact. Despite the VSC and NSL relative reductions being significantly in excess of the BRE 20% target, the retained daylight distribution in the room remains above 50%.

14.42 All windows apart from two are fully BRE sunlight compliant. These two rooms experience reductions in APSH of 28.6% and 46.2%, with larger winter sunlight losses. Both Studios will retain reasonable sunlight levels for this urban location of 14% Annual/7% Winter and 25% Annual/2% Winter respectively.

14.43 The rooms in the block exceed the BRE guidelines, but for most units, the retained daylight and sunlight levels remain good. Given the urban location, the design of the projection balconies around some windows, and the more transient occupation, the impact on the building is moderate but acceptable.

### 31 Kentish Town Road



*Figure 20 – 31 Kentish Town Road in context and photograph*

14.44 The next block at 31 Kentish Town Road also has a more transient occupation as they are managed as serviced apartments. Nonetheless, they have been tested as some periods of occupancy are likely to extend beyond the minimum four days offered by the operator.

14.45 Of the 22 rooms assessed for daylight, two are fully BRE compliant in terms of any VSC and NSL (R2/34 and R3/34). The rooms all have multiple windows serving them, so whilst the 20 remaining, suffer VSC reductions above the BRE

recommendation of 20%, three rooms experience no alteration in NSL daylight within the room at all with each room's main window retaining a VSC above 25% (R3/33, R4/33, and R1/34).

- 14.46 Most of the significant impacts are on the windows which are inset within the building or under balconies, and many of the main windows servicing the rooms, facing out over the street with full height glazing, retain good daylight levels.
- 14.47 Of the remaining 17 rooms, nine of them see their main window retaining good VSC levels for the urban context, ranging from 20.52% to 29.44% VSC. As a result, half retain daylight distribution in the room of over 50%, despite the deep and narrow floorplans, and all but three of the meet BRE ADF targets. The three that don't meet the ADF targets (R6/31, R1/32, and R6/32) are Living / Kitchen / Diners, and whilst they don't meet the 2% target for kitchens, they exceed the 1.5% target for living rooms with ADFs of between 1.65% and 1.77%.
- 14.48 Of the eight remaining rooms, six are bedrooms which the BRE recognises as less important. Furthermore, these bedrooms are positioned in the recess areas of the building and overshadowed by balconies which gives them lower starting values as their view of sky is already restricted. This means that although the relative reductions are high, in percentage points the reductions are between 4 and 10%. The retained ADFs either exceed the 1% target for bedrooms, or only marginally fall short, ranging from 0.83% to 1.21%.
- 14.49 The remaining two rooms (R1/31 and R3/31) are living / kitchen /diners on the first floor. They are both served by large full height glazed windows. The main/largest windows in both cases retain VSC levels of around 18% (17.44% and 19%) which is not unreasonable in this urban context. However, they suffer notable relative NSL reductions of between 33.9% and 39.7%, both retaining less than 50% NSL daylight distribution within the room. This is largely due to their layouts and deep floor plans, particularly in the case of R1/31. However, due to the size of the windows serving these rooms, the retained ADFs are between 1.3% and 3.6%. Both rooms would also receive very good levels of sunlight, both exceeding the BRE targets for total and winter APSH.
- 14.50 Looking at the block as a whole, only three rooms are not fully BRE compliant relating to any APSH alterations for sunlight. However, these three rooms retain reasonable levels of between 20%-24% APSH throughout the year compared to the recommended 25%, and 3%-6% APSH during the winter months compared to the recommended 5%.
- 14.51 The overall levels of retained sunlight to this property are notable on the lower floors, but considered reasonable in this urban context, particularly when tacking into consideration the type of occupancy and design of the building.

### 33 Kentish Town Road

- 14.52 Only two windows do not meet VSC criteria, but these are very minor shortfalls. All retained VSC levels are well in excess of 18%, ranging from 25.03% to 34.2%. Only room R1/23 does not meet the NSL criteria, but it has a low starting position and as a result, the ADF in this room only drops by 0.02 percentage points. All

rooms tested on the building exceed the BRE sunlight requirements. The impact is minimal on this building.

#### Conclusion – Daylight and sunlight

- 14.53 The proposed scheme would have some localised impacts in terms of light to surrounding properties. The use of a light palette and glass will also mitigate some of the impacts to a degree. Overall, most impacts are consistent with the existing urban context and built forms and whilst rooms would experience reductions, they would retain appropriate levels of daylight and sunlight. There will be some notable and unfortunate impacts to some rooms, with the two most severely affected being a second-floor room in Barnes House, close to the boundary line, and a first-floor room at 25 Kentish Town Road. However, these are not considered to be so severe as to warrant refusal of the application.

#### Outlook

- 14.54 The residential properties closest to the application site are 9-15 Camden Road (Barnes House), located to the east of the site. These properties face onto the proposed office space and residential units. In the existing condition, this part of the GUH building is four storeys in height (a double height level at ground floor with a mezzanine and first above) and measures approximately 12.7m high. Number 16 Kentish Town Road is only one storey in height and is an anomaly in the streetscape. In the proposed condition, this part of the building would be four storeys in height (with a double height level at ground floor) and would measure approximately 13.5m for the residential block and office block, but with the roof garden screen on top of the office section which extends up to around 18.5m high. This will increase the sense of enclosure for the occupiers of Barnes House, both the residential and Mind charity, because they currently enjoy an unusually open aspect over the top of number 16. However, this gap is an anomaly, and the prevailing pattern of the area is three to four story buildings in a tight urban grain. The primary outlook for the residents is out of their main living spaces, rather than the rooms over the deck access, and these views on the opposite sides of the block, over the church yard and Camden Road, are unaffected. On balance, the impact on outlook, whilst it is reduced, is acceptable in the context.

#### Noise and disturbance

- 14.55 The proposals include the addition of roof level plant, towards the Sainsbury's to the rear of the building. A Noise Assessment has been submitted in support of the proposals prepared by Aecom. The final plant specification has not been determined yet, and as such, the purpose of the noise assessment is to determine the noise climate in the vicinity of the site.
- 14.56 The report has been reviewed by the Council's Environmental Health Officer (EHO) who has confirmed this approach is acceptable and appropriate noise guidelines have been followed. Noise emissions from proposed building plant will be considered during detailed design in order to ensure that operational noise does not adversely affect nearby residents (both existing residents as well as future occupants of the proposed development). Overall, the application is considered appropriate in environmental health terms subject to conditions to

ensure the development protects residents within the building and neighbouring buildings from noise and vibration within the development; and a condition to secure details of the external noise level emitted from plant and any necessary mitigation measures to ensure it complies with Camden's noise standards, and ongoing compliance with Camden's noise standards. Conditions 21-24 secure these.

- 14.57 Within Grand Union House the office will include the creation of new roof terraces facing Kentish Town Road and the Sainsburys to the rear at fourth floor and a rooftop garden at third floor. The roof garden at third floor would be closest to the new residential flats proposed at No.16 Kentish Town Road and the existing residential properties at 9-15 Camden Road. Due to its larger scale, conditions have been attached restricting the use to 7am-9pm Monday-Saturday and not on Sundays and to prevent music from being played (Conditions 26-27). The roof terraces at fourth floor are small scale and staggered away from Grand Union Walk, it is unlikely that a significant number of people would be able to use the terraces at any one time and their hours of use have not been restricted. However, a condition will ensure loud music is not played on them. The suggested conditions are considered sufficient to prevent unacceptable noise disturbance.

#### Overlooking

- 14.58 The residential development is limited to the southern end of the site and fronts Kentish Town Road. While the residential flats rear windows and inset balconies would face towards 9-15 Camden Road/Barnes House (flat block). The habitable windows on these nearby residential properties are at an oblique angle rather than directly facing. The north-most recessed balconies are around 10m away from the windows of the closest Barnes House flats, extending to around 24m for those furthest away. The south-most balconies are between 16m and 23m away. Although this is a close relationship at certain points, the Barnes House flats are set at an oblique angle limiting direct views into the flats, and the side of the block that faces the proposed development is deck access. This means that the flats are arranged with most of their primary living accommodation on the other side of the block. The windows that face the development also overlook the deck access so there is already close interaction with other block residents. There is also an L-shaped block arrangement to Barnes House which means that for those flats in the corner of the L shape, there is an existing even closer relationship of around 4.5m. However, this is also mitigated because again, they are at an oblique angle to one another and are designed as deck-facing windows (mainly entrance halls, bathrooms with obscured glazing, or kitchens). As such, the relationship would reflect the tight urban grain of the area, and would be set further away than the existing relationship between the deck access flats themselves. As a result there would not be a harmful level of overlooking.
- 14.59 These properties (9-15 Camden Road/Barnes House) would also neighbour Grand Union House and its office accommodation. Although there is a set back at upper levels of the office space and there would be an oblique angle, there may be a potential for some limited overlooking. The applicant has proposed



obscure glazing in the form of etched translucent glass to mitigate the impact. This would be secured by condition 20.

- 14.60 The rear of the properties on Grand Union Walk have no windows so the development would not result in overlooking to these properties. They do have roof terraces however, but these already overlook the service yard (as well as the canal).
- 14.61 The north elevation of the proposed building is almost entirely blank apart from access doors at ground and a single window at third floor level. The development would also have a small roof garden at fourth floor, however given the higher-level location of the terrace and window, and the proposed planting on the terrace (details conditioned) it is unlikely to result in harmful overlooking to these properties more than 14m away.

#### Amenity Conclusion

- 14.62 As mentioned above there will be some impacts to light for residential properties, with the two most severely affected being a second-floor room in Barnes House, close to the boundary line, and a first-floor room at 25 Kentish Town Road. However, on balance these are not considered to be so severe as to warrant refusal of the application on this basis. The proposed building would alter the outlook from nearby residential properties, but this impact is not harmful, and the proposals would not cause unacceptable harm by way of loss of privacy or noise disturbance subject to conditions. As such, the proposals are considered to accord with policies A1 and A4 of the Local Plan.

### **15 Air quality**

- 15.1 The application site fronts the busy Kentish Town Road. The whole of the Borough of Camden was declared an Air Quality Management Area (AQMA) in 2002 due to concern over the achievement of long-term NO<sub>2</sub> AQS objective and short-term PM<sub>10</sub> AQS objective. The site is in an area of very poor air quality.
- 15.2 Camden's Local Plan requires the submission of air quality assessments for developments which are likely to expose residents to high levels of air pollution. Mitigation measures are expected in developments located in areas of poor air quality. A basic Air Quality Assessment (AQA) has been submitted prepared by WSP. The Council's Air quality pro-forma has also been submitted.
- 15.3 The Council's Air Quality Officer has assessed the submitted information. The information provided indicates that the NO<sub>2</sub> at the site is significantly above the Annual Mean objective. Non-compliance with the hourly mean AQS objective for NO<sub>2</sub> is also indicated from monitoring undertaken on the site in 2017. Mechanical Ventilation with Heat Recovery (MVHR) with NO<sub>x</sub> filtration has been recommended for the residential areas. The commercial spaces will be fitted out by the tenant and therefore to ensure NO<sub>x</sub> filtration is fitted it would need to be added into the tenant lease agreement. Condition 8 requires details of NO<sub>x</sub> filtration installed and its maintenance.

- 15.4 The London Plan 2021 states that the areas which exceed the WHO standards are considered to be poor air quality and that proposals should not create an unacceptable risk to high levels of exposure to poor air quality. The PM10 and PM2.5 levels for the site are over 5% above the WHO standard. The office AHUs will be fitted with the required level of particulate filtration.
- 15.5 No mitigation of particulate matter is proposed for the residential properties which may create an unacceptable risk of exposure. Therefore it is recommended that a detailed air quality assessment including site specific modelling of existing air quality should be conditioned to inform if further schemes of mitigation are required and the best location for the air inlets for the building. NOx and PM filtration should be installed with inlets as high as possible and away from any emissions sources including consideration of the outlets from local takeaways. The windows of the residential units should be sealed on the Kentish Town Road side of the building, unless shown by a detailed AQA that the air quality is good. These measures will be secured by condition 7 as part of the detailed AQA.
- 15.6 If shown by the detailed AQA that NO<sub>2</sub> is over 42µg/m<sup>3</sup> at the air inlet for the MVHR units for the retail and or office units then proposals should consider the exposure of workers to poor air quality.
- 15.7 Some mitigation in the form of sustainable travel is proposed which will be of some benefit to local air quality and mechanical ventilation with some filtration is proposed to reduce the occupants' exposure to the air pollution.
- 15.8 London Plan Policy SI B 1) c) states that development should not 'create an unacceptable risk of high levels of exposure to poor air quality for the residential areas. Further proposals should consider the exposure of workers to poor air quality.'
- 15.9 As the development is not fully compliant with the requirements of London Plan Policy SI B 1) c) to mitigate this the development should implement design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air pollution, or mitigation required. Officers would recommend that as a minimum mitigation (MVHR with NOx and PM filtration, sealed windows and winter gardens) should be provided. Occupiers to be advised of health risks from poor air quality at the site. It is recommended that the details of the mechanical ventilation and filtration for NOx and PMs should be secured through condition and the agreed s106 should include a requirement to advise all occupiers of the air quality issues at the site and associated health risks.

#### Impacts on local air quality

- 15.10 The air quality assessment considers the operational phase of the proposed development and impacts on local air quality due to emissions from road traffic associated with the proposed development. No on-site or on-street parking is provided as part of the proposed development, with existing parking spaces to be removed. The proposed development is car-free. The proposed development seeks to minimise the generation of CO<sub>2</sub> with a highly efficient building envelope

with high efficiency mechanical and electrical services, along with air source heat pump and photovoltaic cells. These measures are welcomed.

15.11 The proposals are air quality neutral which meets the policy requirement.

#### Construction Impacts

15.12 The site is a medium risk for construction dust and appropriate measures to reduce the risk are proposed including real time dust monitoring. These would be secured in the Construction Management Plan as part of the s106 legal agreement, and a condition is recommended for the dust monitoring (condition 9).

### **16 Sustainable design and construction**

16.1 The Local Plan requires development to incorporate sustainable design and construction measures, to ensure they use less energy through decentralised energy and renewable energy technologies. All developments are expected to reduce their carbon dioxide emissions by following the steps in the energy hierarchy (be lean, be clean and be green) to reduce energy consumption. Policies CC1 and CC2 of the Local Plan require development to minimise the effects of and be resilient to climate change and to meet the highest feasible environmental standards. Developments must achieve a 20% reduction in CO2 emissions through renewable technologies (the 3rd stage of the energy hierarchy) wherever feasible. They are also expected to achieve a BREEAM 'Excellent' rating and minimum credit requirements under Energy (60%), Materials (40%) and Water (60%).

16.2 To comply with the London Plan the proposal should be zero carbon and as part of this must secure a minimum 35% reduction on site in regulated CO2 emissions below the maximum threshold allowed under Part L of the Building Regulations 2013. Where the zero carbon target cannot be met fully on-site, the Council may accept the provision of measures elsewhere in the Borough or a financial contribution (charged at £90/tonne CO2/year over a 30-year period) to secure the delivery of carbon reduction measures on other sites. The London Plan requires development to be designed in accordance with the energy hierarchy: be lean (use less energy), be clean (supply energy efficiently), be green (use renewable energy).

16.3 The Council's Sustainability Officers have assessed the details of the submission, which includes an Energy Strategy and a Sustainability Statement (including BREEAM Pre-assessment). They also submitted the Council's proforma for Sustainability and Energy. In summary the Commercial CO2 reduction target of 35% on site is exceeded, achieving more than 53% reductions. There is a 51.5% stage reduction from renewables, significantly exceeding the policy target of 20%. Again, the residential significantly exceeds the 19% on-site target achieving 72.3% reductions, along with more than 68% stage reduction from renewables, again significantly exceeding the 20% target. Whilst the Residential Zero Carbon target is not met fully on-site, this would be overcome via a Carbon Offset financial contribution of £102,002 in line with policy requirements.

16.4 The office areas would exceed policy requirements and achieve BREEAM outstanding with a score of 87%, with the following policy-compliant minimum credits:

- *Energy 81%*
- *Water 78%*
- *Materials 79%*

16.5 The water efficiency target for the residential scheme is confirmed as 105 litres per day per occupant (internal use) in compliance with Policy CC3. This is to be achieved using water efficient sanitary fittings and shall be secured by condition (condition 32).

16.6 The proposals do not include connection to a District Energy Network but there are currently no existing networks near the development.

16.7 The following would be secured by planning condition and S106 obligations:

- Sustainability measures through section 106 sustainability plan, including BREEAM 'Outstanding', individual BREEAM scores listed above and water efficiency targets for residential parts.
- Energy measures through section 106 Energy Efficiency and Renewable Plan:
  - *Non-Residential parts –*
    - *overall minimum 53.5% CO2 reductions beyond Part L 2013 as amended;*
    - *minimum 3.8% Be Lean stage reduction through building efficiency;*
    - *minimum 51.5% Be Green stage reduction through renewables*
  - *Residential parts –*
    - *overall minimum 72.3% CO2 reductions beyond Part L 2013 as amended;*
    - *minimum 12.7% Be Lean stage reduction through building efficiency;*
    - *minimum 68.2% Be Green stage reduction through renewables*
- Carbon Offset contributions to be secured through section 106 legal agreement of £102,002. Solar PV, Air Source Heat Pump and green/blue roof details shall be secured by planning condition (conditions 10, 11 and 12).

#### Carbon assessment

16.8 As mentioned in the Demolition section above a whole life carbon assessment is not required in this instance, as the scheme falls somewhere in between substantial refurb and total/substantial demolition. However, details regarding carbon emissions have been provided in the submitted energy and sustainability statements in line with Policy CC1.

- 16.9 The proposed development has selected materials to be used on site that will have a low embodied energy and all the timber used on site will be sustainably sourced from accredited FSC or PEFC sources. Additionally, a compliant BREEAM life cycle assessment has been carried out to establish the embodied carbon footprint of the development over a 60-year lifecycle and various design options to reduce carbon has been considered. This has included alternative material specifications, resource efficiency initiatives and using alternative methods of construction.
- 16.10 Their sustainability statement states that a pre-demolition audit will be carried out prior to works commencing on site. This welcomed, however this would fall under part of the requirement of the pre-commencement condition (14) that the Council's Sustainability Team's have requested. Condition 14 requires a resource management plan demonstrating how 95% of construction and demolition waste will be reused, recycled or recovered. This will also include the provision of the pre-demolition audit.
- 16.11 As such, given the proposed development would result in lowered carbon emissions over time, the principle of the proposed partial/full demolition of the existing buildings is accepted on energy and sustainability grounds.

## **17 Flood risk and drainage**

- 17.1 Camden Local Plan policy CC3 states major development schemes are expected to:
- Achieve greenfield run-off rates wherever feasible and as a minimum, 50% reduction in run off rates.
  - To include Sustainable Urban Drainage Systems (SuDS), unless demonstrated to be inappropriate.
  - To follow the drainage hierarchy in policy SI 13 of the London Plan.
  - To constrain run-off volumes to greenfield run-of volumes for the 1 in 100 year 6 hour event plus climate change.
- 17.2 A flood risk assessment and outline drainage strategy was submitted in support of the application. The site is shown in the EA Flood Maps as being located within Flood Zone 1, which based on the NPPF, is classified as having a 'low' probability of tidal and fluvial flooding. However, the site is on a previously flooded street which is defined in the Local Plan (section 8.58) as an area at risk of flooding. Following initial concerns raised by the Council's Lead Local Flood Authority (LLFA) Officer as to the level of detail provided, the applicant provided additional information to address these comments.
- 17.3 As the proposed development will comprise of a building that covers the entire site area and needs to retain a servicing access road for Sainsburys, it will not be possible to utilise infiltration devices, ponds or water features for surface water disposal, as they cannot be located at a suitable distance from foundations or boundaries to comply with Building Regulations.

- 17.4 The applicant has explored the possibility to increase the amount of soft landscaping to the rear of the site to further improve drainage on site. However, this is accepted as not feasible because there is no floor depth to this area as it is a concrete slab directly over the basement roadway below. Additional planters would not be appropriate in this area either as it would restrict access to the cycle parking and it might reduce passive surveillance achieved from the ground floor office space. It is acknowledged that the existing site is constrained due to retaining part of the super structure and access for Sainsburys into the service yard.
- 17.5 The development will provide 156m<sup>2</sup> of blue roofs which can attenuate 23.4m<sup>3</sup> of rainwater and 1,387m<sup>2</sup> of biodiverse green roofs which will manage surface water run-off, as well as provide biodiversity and amenity benefits. The proposal will significantly improve the pre-development peak run-off rates and will provide attenuation to achieve greenfield runoff rates.
- 17.6 The Council's Lead Local Flood Authority (LLFA) Officer has confirmed that the proposed SuDS are acceptable, subject to full details of the following being secured by condition:
- Blue and green roof details (condition 10)
  - Provision of a lifetime maintenance plan (condition 5)
- 17.7 The LLFA also requested a flood risk emergency plan, however given that the scheme does not have basement or any sensitive uses on the ground floor, it was considered by officers to be disproportionate and therefore not included.

## **18 Transport**

### Policy review

- 18.1 Camden Local Plan policies T1, T2, T3 and T4 and the Transport CPG are relevant with regards to transport issues.

### Introduction

- 18.2 The site has a PTAL rating of 6b which is considered to be an excellent level of public transport accessibility. The site is located on Kentish Town Road (A400) which forms part of the Strategic Road Network (SRN). SRN roads are near the top of the borough's road hierarchy, second only to the Transport for London Road Network (TLRN) roads, for which TfL is the Highway Authority. Kentish Town Road has northbound one-way working next to the site.
- 18.3 Various transport interchanges are located within a 5-minute walk of the site, including Camden Town station (Northern Line) and Camden Road station (London Overground). In addition, bus stops serving various routes are located nearby on Kentish Town Road, Bayham Street, Camden High Street, Camden Road and Camden Street.

- 18.4 Cyclists and pedestrians make up a significant proportion of the traffic in the vicinity of the site, particularly during peak periods. The site is also conveniently located near various cycle hire docking stations, which are bike hire schemes for short journeys.
- 18.5 Documents submitted in support of the application include a Transport Assessment (TA) was submitted in March 2021 and a Transport Assessment Addendum (TAA) was submitted in September 2021. These observations take account of the TA and the amendments contained in the Transport Assessment Addendum.

#### Cycle parking

- 18.6 Local Plan Policy T1 requires developments to sufficiently provide for the needs of cyclists which also helps to promote health, improved air quality and sustainable transport. The London Plan requires 89 long stay spaces for the office, and 2 long stay for the other commercial space, giving a total of 91. The applicant has provided 114 long stay spaces in total for the office and commercial floorspace, exceeding policy requirements. The London plan requires 11 long stay spaces for the residential and again, this is exceeded with the applicant providing 12 residential long stay spaces. The indicative layouts already show provision of several larger spaces and use of some Sheffield stands to allow for accessible adapted and non-standard bikes across the development. Condition 18 secures final details of the long stay cycle parking including 8 spaces for accessible or non-standard bikes.
- 18.7 The London Plan requires 26 short stay spaces serving the development and the application proposes 37. Whilst the preference is for all short-stay cycle parking to be located on site, the TA maintains there will be a 3m width of footway adjacent to the bays in Kentish Town Road. The minimum length of a bay with a cycle parked on a stand is 2m (London Cycling Design Standards Clause 8.2.3). Provided a 3m gap can be achieved with a 2m stand, this would be accepted. Camden M stands will be provided for short stay parking on the public highway and a financial contribution would be secured as part of s106 legal agreement for their provision where they rest outside the site boundary.
- 18.8 The proposal of 126 Long-Stay and 37 Short-Stay spaces exceeds the requirements of the London Plan and they will be secured by condition 18.

#### Car parking

- 18.9 Policy T2 states that the Council will limit the availability of parking and require all new developments in the borough to be car-free. The application site is located within a town centre, falls within a controlled parking zone and has a PTAL of 6b. Therefore, the proposed development would need to be car-free. The applicant is willing to restrict the ability of residents to apply for an on-street parking permit via legal obligation. Car free development will be secured by a S106 legal agreement.



- 18.10 No new car parking spaces will be created and all existing spaces within the ground floor car park will be removed. The basement car park is owned by Sainsburys and would remain outside the red line.
- 18.11 There is no disabled parking provided on site and the nearest Blue Badge Bay is in Hawley Crescent, near the junction with Stucley Place. The distance from the site is about 160m, which exceeds the Council's recommended maximum distance of 50m. If the Council receives a request for a Blue Badge Bay from an eligible resident, the Council would have to convert a CPZ bay to satisfy the requirement. The exact location would need to be subject to detailed design and consultation, but there are bays directly in front of the site. A contribution of £10,500 for any future disabled bay implementation within the vicinity of the site would be secured by S106.

#### Deliveries and servicing

- 18.12 A draft Delivery and Servicing Management Plan (DSMP) has been prepared in support of the application. The document makes a forecast of delivery trips, indicating there would be 15 delivery trips on an average weekday and 2 delivery trips in the busiest hour.
- 18.13 All deliveries, refuse and recycling collections and other servicing activity would be accommodated from the public highway in the general vicinity of the site. Such activities are most likely to take place from yellow lines directly adjacent to the site on Kentish Town Road. However, such activity could also take place from pay to park parking bays in the general vicinity of the site. An on-street delivery bay is shown, and this would be accepted, provided it had a suitable Traffic Management Order (TMO) with a single yellow line. The details of this are discussed further in the Highway works section below.
- 18.14 Deliveries, refuse and recycling collections and other servicing could have an impact on neighbours if not sufficiently managed. A servicing management plan would therefore be secured as a section 106 planning obligation if planning permission were granted. The DSMP should include a requirement for a trained banksman to supervise deliveries made from the kerbside.

#### Trip generation/ Travel Planning

- 18.15 The TAA includes a revised forecast of trip generation derived from the TRICS trip generation software. Estimates of total person trips are made for the existing office floorspace, the proposed office floorspace and for the residential component of the development. The majority would approach the site via public transport, bike or on foot.
- 18.16 It is noted that redeveloped buildings often have higher capacity and higher attraction rates than their predecessors so the net increase in trip generation could be higher than that indicated by the TRICS trip generation software. Regardless it is considered that the number travelling to the site would result in a significant increase.

- 18.17 The majority of the predicted trips are associated with the office use. This could lead to higher pressure on local transport infrastructure. A draft travel plan has been submitted in support of the planning application. This is welcomed as it demonstrates a commitment to encouraging and promoting trips by sustainable modes of transport.
- 18.18 A strategic workplace travel plan and associated monitoring and measures contribution of £9,762 would be secured as a section 106 planning obligation if planning permission is granted. The Travel Plan would be targeted towards the office use, to encourage staff to make walking, cycling and travel by public transport the natural choice for day-to-day trips.

#### Highway impacts in the Vicinity of the Site

- 18.19 The carriageway and footway directly adjacent to the site on Kentish Town Road is likely to sustain significant damage because of the proposed demolition, excavation and construction works required. The Council would need to undertake remedial works to repair any such damage following completion of the proposed development.
- 18.20 A highways contribution would be secured as a section 106 planning obligation. This would allow the Council to repave the carriageway adjacent to the site, provide new footways along the eastern and western frontage of the building and repair any other damage to the public highway in the general vicinity of the site. The site has a vehicular crossover in Kentish Town Road south of the entrance, which will become redundant and need to be reinstated. The highway works would be implemented by the Council's highways contractor on completion of the development. A cost estimate for the highway works is £88,696.45, this will be secured by S106.
- 18.21 The *Public realm & Landscape plan PHASE 1* drawing shows a zebra crossing in Kentish Town Road, roughly between Buck Street and the site entrance. The full arrangement for a zebra crossing, including, zig-zag markings etc., would take up around 40m and clash with the existing vehicular exit, paid-for parking as well as the loading bay. Although it is indicative as it falls outside their red line and involves public highway and does not form part of this scheme, the Council's highways team have advised that it would not be supported.

#### Landscaping

- 18.22 Revised indicative landscaping plans showing planting along the pavement on in Kentish Town Road have been provided. Although not part of the current proposal it is a future aspiration, it could be considered in the future and it does not form part of the scheme.
- 18.23 The area within the undercroft and the small area of the service yard immediately adjacent to the undercroft would undergo public realm/landscaping improvements.

- 18.24 It is noted that TFL raised in their initial comments that suggestions in the applicant's active travel zone assessment of the pedestrian route towards Kentish Town Station could be further explored within this application. The transport statement submitted outlines that this route could benefit from cleaner air by removing the on-street car parking and widening the pavement to improve comfort with the potential for additional tree planting and places to rest (seating). Originally the scheme proposed to remove the on-street car parking (not in their ownership), widen the footway and plant trees on Kentish Town Road. However, due to lack of detail on the feasibility this element was removed. It is acknowledged that these improvements could be further explored at a later date with a separate consultation. An indicative revised plan was submitted showing the potential to plant on the highway, but it does not form part of this application. If it was acceptable and included, it would be likely that it may not be feasible as it would impact on their viability.
- 18.25 It should also be noted that parking is still required to serve the local businesses and to provide overspill space for servicing to the development site in times of high demand. The existing footway is already generous with a minimum width of 4.6m and widening to 6.5m at the northern end. Also, pedestrian air quality can be improved by increasing the distance between pedestrians and moving traffic. The existing parking bays (2.1m wide) provide a buffer between pedestrians and moving traffic on the 4.6m wide section of footway. Converting the bays to footway, i.e., widening the footway to 6.7m, would not necessarily significantly improve air quality for pedestrians as the separation would remain unchanged.
- 18.26 In addition, no seating/places to rest were included as the site has been subject to anti-social behaviour historically and officers do not think it would be a strong benefit to the site. However, the Council did receive updated comments from TFL when the scheme was revised to say that they do now support the application with no further recommendations.

#### Construction Management Plan (CMP)

- 18.27 The proposal would require a significant amount of demolition and construction works. A large number of construction vehicle movements would be generated during the demolition and construction period. The Council's primary concern is public safety in addition to ensuring that construction traffic does not create (or add to existing) traffic congestion. There is also the need to ensure that there is no cumulative impact with other developments in the area. The proposal is likely to lead to a variety of amenity issues for local people, such as noise, vibration, dust and air quality.
- 18.28 The Council needs to ensure that the development can be implemented without being detrimental to amenity or the safe and efficient operation of the highway network in the local area.
- 18.29 A framework Construction Management Plan (CMP) was submitted with the application. While the information provided in the framework CMP is useful, a more detailed CMP would be secured by a S106 Legal Agreement which would

also ensure liaison with local residents and businesses. The CMP would be submitted and agreed prior to any works commencing on site. The final CMP would require significant input from Council officers, residents, and other stakeholders before being approved.

18.30 The Council would expect construction vehicle movements to and from the site to be scheduled to avoid peak periods to minimise the impacts of construction on the transport network. This is particularly important due to the location of cycle and pedestrian routes adjacent to the site. The contractor would need to register the works with the Considerate Constructors' Scheme. The contractor would also need to adhere to the CLOCS standard.

18.31 In addition, a CMP implementation support contribution of £28,520 and a Construction Impact Bond of £30,000 would be secured as s106 planning obligations in accordance with Policy A1.

## **19 Safety and security**

19.1 Camden Local Plan Policy C5 (safety and security) and the Design CPG are relevant with regards to secure by design.

19.2 TRACT have raised concerns that anti-social behaviour will be pushed into Camden Gardens. Also, that the open areas, frontages and planting should be maintained and design out anti-social behaviour (ASB) including graffiti.

19.3 Camden Gardens is located on the other side of the canal, a significant distance from the development and officers see no reason that development would encourage ASB specifically in this location mentioned. The proposed landscaping will be maintained by condition and the entry/exit to the buildings and landscaping have been designed in conjunction with advice from the designing out crime officer. Graffiti is a social matter rather than a material planning consideration, but the building has not been designed in a way which would encourage it.

19.4 The main issue with the current building is the large undercroft for vehicle/pedestrian access into the Sainsburys car park, this is largely non-active and has been linked with anti-social behaviour, with almost no natural surveillance. The development will improve this existing situation significantly by reducing the number of entry points and creating a natural surveillance through an active frontage.

19.5 The Designing Out Crime Officer was consulted prior to the application being submitted and was involved in the design process. The Officer has confirmed they have no objections to the proposal overall and they have fully advised the applicant on the importance of being able to control access into the building. With regards to the residential units, it was advised that these achieve 'Secured by Design' accreditation, which can be easily achieved.

- 19.6 As mentioned, the proposals will introduce an active frontage more appropriate to Kentish Town Road. An active frontage strategy has been secured under condition 15 to further ensure interest, surveillance and interaction with the street which will discourage crime. These measures are welcomed, and an informative will be added to the decision notice to remind the applicant that it is recommended the scheme is designed to Secured by Design Silver credentials.

## **20 Refuse and recycling**

- 20.1 Camden Local Plan policy CC5 (Waste) and Camden Planning Guidance (Design) are relevant with regards to waste and recycling storage and seek to ensure that appropriate storage for waste and recyclables is provided in all developments.
- 20.2 Separate dedicated waste stores are provided for the commercial uses and for the residential units. The residential waste store is located at ground floor with direct access onto Kentish Town Road. The Office waste store is located to the rear of the building at ground floor beside the servicing road which leads out to Kentish Town Road.
- 20.3 The submitted waste management report outlines that the three retail units will be required to provide waste storage areas within their premises. The individual commercial occupiers' waste stores should have sufficient capacity to allow refuse and recycling to be segregated. The size/ capacity of the waste stores should be sufficient to accommodate the volumes of waste generated by the occupiers' business activities and the frequency that waste will be collected. These waste storage areas are where waste produced by the retail units will be sorted prior to collection. On collection days, the collection operatives will collect the waste directly from the retail units to the RCV which would park on Kentish Town Road.
- 20.4 A condition is recommended prior to the occupation of the development for full details of the location, design and method of waste storage and removal including recycled materials for both the commercial and residential uses. The final details would need to be agreed the Council's Environmental Services Officer (condition 16). An additional condition will also ensure that refuse and recycling bins are not left on the public highway (condition 25).

## **21 Employment and training opportunities**

- 21.1 The proposed development would be likely to generate increased employment opportunities during the construction phase, and as such, the Council would aim to ensure that local people benefit from these opportunities by securing a package of employment and training obligations through a Section 106 legal agreement. The applicant has put forward an enhanced package of benefits covering the construction phase and end user phase of the development. The following table sets out numbers of placements which increase the CITB guidelines:

No.	New Entrants - Skills development	Numbers
1.	School/Curriculum Based Activities / College Site Visits – number	6 (Construction)
2.	School/College Site Workshops – number	4
3.	Work experience	14 (Construction) 1 (End-use)
3a	14-16 years – person weeks	3
3b	16+ years – person weeks	3
4.	Apprentices – New starts	11 (Construction) 1 (End-use)
<b>Skills Culture</b>		
5.	Employment – number of roles created	11 (Construction) 1 (End-use)
6.	Locally procured good and services – value £'s	10%

21.2 The following list includes the other measures included in the enhanced package:

- The main contractor will work with Camden STEAM and Urban Partners to deliver Virtual work experience and will continue to offer this over the duration of the project.
- During the end-use phase of the project the main contractor will look to create a rolling programme of 1 end-use apprenticeship opportunities and 1 end-use placements.
- They will also look to identify minority run businesses from the borough that we can introduce into our supply chain.
- They will look to support the delivery of sector-based work Academies within the borough.
- They will also welcome applications from under-represented groups such as women ethnic minority candidates, care leavers and ex-offenders, while also ensuring these individuals are selected on merit.
- All 18+ covered under this package will be paid London Living wage.

21.3 Overall, the enhanced employment and training package taken together with the measures set out in the Employment, Sites and Business Premises CPG will cover the following:

General:

- Work with Camden STEAM and Urban Partners to deliver Virtual work experience and will continue to offer this over the duration of the project.
- Look to identify minority run businesses from the borough that we can introduce into our supply chain.
- Look to support the delivery of sector-based work Academies within the borough.
- Welcome applications from under-represented groups such as women ethnic minority candidates, care leavers and ex-offenders, while also ensuring these individuals are selected on merit.
- All aged 18+ covered under this package paid London Living wage.

#### Construction phase

- The applicant should work to CITB benchmarks for local employment when recruiting for construction-related jobs.
- The applicant should advertise all construction vacancies and work placement opportunities exclusively with the King's Cross Construction Skills Centre for a period of 1 week before marketing more widely.
- The applicant should provide construction work placement opportunities of not less than 2 weeks each, to be undertaken over the course of the development, to be recruited through the Council's King's Cross Construction Skills Centre.
- Provision of 11 apprentice placements and a support fee of £17,000. Recruitment of construction apprentices should be conducted through the Council's King's Cross Construction Skills Centre. Recruitment of non-construction apprentices should be conducted through the Council's Inclusive Economy team.
- School/curriculum-based activities/college site visits: 6 Construction.
- Work experience: 14 construction for six weeks.
- The applicant must also sign up to the Camden Local Procurement Code.
- The applicant should provide the final updated local employment, skills and local supply plan setting out their plan for delivering the above requirements in advance of commencing on site.

#### End User

- Opportunity to discuss the promotion of the Good Work Camden programme amongst end use occupiers, including the advertising of opportunities on site through Camden's Job Hubs
- During the end-use phase of the project the main contractor will look to create a rolling programme of 1 end-use apprenticeship opportunities and 1 end-use placements.
- School/college workshops: 4
- Work experience: 1 end use for six weeks
- Employment and training contribution is £99,875.

21.4 Officers welcome the applicant's enhanced offer. The scheme would generate the need for 9 construction apprenticeships (construction costs excluding inflation forecast and contingency) however they are offering 11. This is in addition to school visits, work experience and the commitment to hire within



Camden to a range of applicants as outlined above. The applicant also commits to paying London Living Wage to all those involved aged 18+.

21.5 The Employment sites and business premises CPG sets out how the Council will seek to use planning obligations to secure an element of affordable SME workspace from large scale employment developments with a floorspace of 1,000sqm (GIA) or more. As discussed in the land use section, 333sqm of affordable workspace at a 30% market discount for period of 10years will be provided at first floor. The development would also provide a flexible layout which would attract a number of different sized businesses and occupiers including SMEs in the future if the proposed tenants were to leave.

21.6 Overall, the proposals meet the aims and objectives of policies E1 and E2 of the Camden Local Plan.

## **22 Fire Safety**

22.1 Policy D12 (Fire safety) of the London Plan requires all major development proposals to be submitted with a Fire Statement. The application has been supported by a Fire Strategy Report which includes details of the fire strategy and confirms that there will be no connection between the commercial spaces and the residential building. The report has been prepared by authors with the relevant qualifications and experience.

22.2 The fire strategy for the residential is based on guidance in BS9991: 2015 Fire safety in the design, management and use of residential buildings – Code of practice. The fire strategy for the non-residential areas is based on guidance in BS9999: 2017 Fire safety in the design, management and use of buildings – Code of practice.

22.3 The residential building will be designed with a single core in accordance with BS 9251. The residential flats will be designed in accordance with the recommendations of BS 9991.

22.4 The office will be served by three stairs across all floors and an additional staircase between the ground and mezzanine level. Sprinklers are not proposed, instead an Automatic Fire Detection and Alarm system (AFDA) to a Category L1 standard is recommended. The fire detection system will consist of a combination of smoke and heat detectors with manual call points placed at all storey and final exits.

22.5 The retail areas are only at ground floor with separate entrances. will be served by the same cores serving the office levels as well as stairs within the units. Each independent retail unit will be provided with its own fire control panel. The systems should be designed to meet the recommendations detailed in BS 5839-1:2017. The floor area of the retail areas is small and therefore voice alarm is not recommended.

22.6 Further checks to do with fire safety are dealt with under the building control regulations. A compliance condition (condition 34) to ensure the development is implemented in line with this fire strategy has been attached.

## 23 Financial obligations

23.1 The following financial contributions are required to mitigate the impact of the development upon the local area, including on local services. These form part of the heads of terms discussed previously in the report.

23.2

Contribution	Amount (£)
Public open space contribution	£58,603
Highways contribution	£88,696.45
Disabled bay contribution	£10,500
Workplace travel plan monitoring contribution	£9,762
CMP implementation support contribution	£28,520
Construction Impact Bond	£30,000
Carbon offset contribution	£102,002
Apprentice support fee	£17,000
Employment and training contribution	£99,875
<b>Subtotal</b>	<b>£444,958</b>
Affordable housing contribution (deferred)	£2,467,500
<b>Total</b>	<b>£2,912,458</b>

## 24 Community Infrastructure Levy (CIL)

24.1 The proposal would be liable for both the Mayor of London's CIL2 (MCIL2) and Camden's CIL due to the net increase in floorspace and creation of residential units. Based on the MCIL2 and Camden's CIL charging schedules and the information given on the plans, the charges are likely to be £1,255,243. This estimate is based on the uplift of the development and the existing/demolished uses being lawful. The CIL estimate is based on the following calculations:

- E Flexible retail uses MCIL2 – 37sqm x £165 = £6,105
- E office use MCIL2 – 4,006sqm x £185 = £741,110
- C3 residential floorspace - MCIL2 - 523sqm x £80 = £41,840
- E Flexible retail uses Camden CIL – 37sqm x £32 = £1,184
- E office use Camden CIL – 4,006sqm x £32 = £128,192
- C3 residential floorspace Camden CIL – 523sqm x £644 = £336,812

24.2 This would be collected by Camden after the scheme is implemented and could be subject to surcharges for failure to assume liability, submit a commencement notice and late payment, and subject to indexation in line with the construction costs index. An informative would be attached on any decision notice advising the applicant of these charges. The final charges would be decided by Camden's CIL team.

## 25 Conclusion

- 25.1 The proposed development is a well-considered scheme which presents the opportunity to make significant improvements to the local area, deliver notable environmental improvements, and provide a range of significant public benefits.
- 25.2 The proposed development has an appropriate mix of uses for the site that would increase and enhance the existing uses around the site while benefitting a number of the Council's policy objectives by contributing towards a successful economy and retail function and making an appropriate contribution towards the Borough's supply of housing.
- 25.3 Although the development results in some impacts to light of surrounding properties, these impacts are not disproportionate to the dense urban context or tight urban grain. The most significant impacts are not so detrimental as to undermine the quality of accommodation and on balance, the impact is considered acceptable.
- 25.4 The proposals would result in the partial loss of Grand Union House and the loss of the building at No.16 Kentish Town Road on site; however, these contribute little to the streetscene or townscape. The proposals preserve and, in some cases, enhance the setting of the nearby designated heritage assets. However, should Members also consider the development to cause harm, then this must be given considerable weight in the balancing exercise.
- 25.5 The National Planning Policy Framework (NPPF) (paragraph 202) states:
- "Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use."*
- 25.6 Public benefits may follow from many developments and could be anything that delivers economic, social, or environmental objectives, as described in the National Planning Policy Framework. Public benefits should flow from the proposed development. The proposals provide a significant number of public benefits, including environmental, social and economic benefits which are considerable and could be capable of outweighing any identified harm. The most significant of these are listed below.

Environmental benefits:

- Providing a highly sustainable new building which uses low carbon materials and recycle existing material identified in a pre-demolition audit;
- Overall improvement to the townscape and street scene;
- Delivering a building which achieves a BREEAM score of "Outstanding" for the office and retail elements which goes a long way to meeting zero carbon;
- Creating car free development and removing some of the existing office car parking on site;
- Promoting sustainable modes of travel with a focus on cycling and exemplary end of trip facilities;

- Providing urban greening at roof level and along the new terraces to provide biodiversity and ecology benefits; and
- Contributing to new public realm and open space with a contribution of £58,603

#### Economic benefits:

- Providing new high-quality flexible office accommodation in an identified area of economic growth to provide significant numbers of jobs, apprenticeships, and work experience for workers across the construction and end user phases;
- Allowing a Camden based employer to stay and grow in the borough;
- High quality affordable workspace; and
- Investment in the Camden economy through local procurement during construction.

#### Social Benefits:

- Reducing crime and antisocial behaviour through design improvements and increasing natural and passive surveillance on Kentish Town Road;
- Opportunities for local people to undertake apprenticeships and work placements;
- Six new high quality homes;
- Genuinely affordable homes for residents, let at Camden Intermediate Rents;
- Enhancements to several designated heritage assets; and
- Significant contributions towards the provision of local infrastructure and facilities through CIL, financial contributions in the S106.

25.7 Paragraphs 10 and 11 of the NPPF state there is a presumption in favour of sustainable development, which should be a golden thread running through decision making. The dimensions of sustainable development are economic, social and environmental which should be sought jointly. The proposed development would result in significant benefits through all 3 strands of sustainable development without any adverse impacts that significantly or demonstrably outweighing them. The proposal is in accordance with relevant National and Regional Policy, the Camden Local Plan, Camden Planning Guidance and other supporting policy guidance.

## **26 Recommendation**

26.1 Planning Permission is recommended subject to conditions and a Section 106 Legal Agreement covering the following Heads of Terms:

### **Air Quality**

- Owner to advise all residents about air quality issues at the site and associated health risks, prior to the point of sale / tenancy agreement to enable an informed decision by the potential occupant.

### **Affordable housing**

- Deferred affordable housing contribution of £2,467,500 including a review mechanism in accordance with CPG.
- Six units to be secured as Camden Intermediate Rent

### **Affordable workspace**

- Provision of 333sqm of affordable workspace at 30% less than market rate, for 10years
- Annual reports outlining number of businesses accessing the space (and number of new businesses each year), and the size (turnover/employees), sector/activity and status of those businesses to be provided to the Council's economic development team

### **Employment and training**

#### General:

- Work with Camden STEAM and Urban Partners to deliver Virtual work experience and will continue to offer this over the duration of the project.
- Look to identify minority run businesses from the borough that we can introduce into our supply chain.
- Look to support the delivery of sector-based work Academies within the borough.
- Welcome applications from under-represented groups such as women ethnic minority candidates, care leavers and ex-offenders, while also ensuring these individuals are selected on merit.
- All aged 18+ covered under this package paid London Living wage.

#### Construction phase

- The applicant should work to CITB benchmarks for local employment when recruiting for construction-related jobs.
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#### End User

- Opportunity to discuss the promotion of the Good Work Camden programme amongst end use occupiers, including the advertising of opportunities on site through Camden's Job Hubs
- During the end-use phase of the project the main contractor will look to create a rolling programme of 1 end-use apprenticeship opportunities and 1 end-use placements.
- School/college workshops: 4
- Work experience: 1 end use for six weeks
- Employment and training contribution is £99,875.

### **Energy and sustainability**

- BREAAAM Outstanding compliance and post construction review, targets as stated in the energy and sustainability statements for Energy, Materials and Water
- Energy measures including on-site renewables
- Energy provisions to be secured through Energy Efficiency & Renewable Energy Plan to include:
  - *Non-Residential parts –*
    - *overall minimum 53.5% CO2 reductions beyond Part L 2013 as amended;*
    - *minimum 3.8% Be Lean stage reduction through building efficiency;*
    - *minimum 51.5% Be Green stage reduction through renewables*
  - *Residential parts –*
    - *overall minimum 72.3% CO2 reductions beyond Part L 2013 as amended;*
    - *minimum 12.7% Be Lean stage reduction through building efficiency;*
    - *minimum 68.2% Be Green stage reduction through renewables*
- Sustainability measures for the whole development in accordance with approved statements
- Carbon offset contribution of £102,002

### **Landscaping, trees and open space**

- A contribution of £58,603 towards public open space

### **Transport**

- Car free development
- Construction Management Plan (CMP) and associated requirement for a Construction Working Group to be formed prior to commencement.
- CMP implementation support contribution of £28,520 and a Construction Impact Bond of £30,000.
- Provision of a future disabled parking bay on the highway contribution of £10,500. Works to include traffic order, design and consultation.
- Financial contribution of £88,696.45 for highway works directly adjacent to the site. Works to include amongst other things:
  - New ASP flags
  - Utility covers in footway
  - Road markings
  - Traffic order, design and consultation
  - Traffic Management

- Cycle stands on footway
- Post and sign
- Delivery and servicing management plan
- Level Plans are required to be submitted at the appropriate stage showing the interaction between development thresholds and the Public Highway to be submitted to and approved by the Highway Authority prior to any works starting on-site. The Highway Authority reserves the right to construct the adjoining Public Highway (carriageway, footway and/or verge) to levels it considers appropriate.
- Strategic workplace travel plan (for the office) and associated monitoring and measures contribution of £9,762.

### **Project Architect**

- Retention of project architects

## **27 Legal Comments**

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

## **28 Conditions**

1	<p><b>Implementation</b></p> <p>The development hereby permitted must be begun not later than the end of three years from the date of this permission.</p> <p>Reason: In order to comply with the provisions of Section 91 of the Town and Country Planning Act 1990 (as amended).</p>
2	<p><b>Approved drawings</b></p> <p>The development hereby permitted shall be carried out in accordance with the following approved plans:</p> <p>Existing Plans: 0004 Rev.P1; 0005 Rev.P1; 0100 Rev.P1; 0101 Rev.P1; 0102 Rev.P1; 0200 Rev.P1; 0300 Rev.P1 and 0310 Rev.P1.</p> <p>Proposed Plans: 1005 Rev.P2; 1100 Rev.P2; 1101 Rev.P1; 1102 Rev.P1; 1103 Rev.P1; 1180 Rev.P1; 1181 Rev.P2; 1182 Rev.P2; 1183 Rev.P1; 1210 Rev.P1; 1220 Rev.P2; 1230 Rev.P2; 1240 Rev.P2; 1270 Rev.P1; 1300 Rev.P1; 1310 Rev.P1; 1380 Rev.P1; 2010 Rev.P1;</p> <p>DR_P0032_PL_101 Rev A; DR_P0032_PL_102 Rev.C; DR_P0032_PL_103 Rev.B; DR_P0032_PL_111 Rev.C; DR_P0032_PL_211 Rev A; DR_P0032_PL_212 Rev B;</p>



	<p>DR_P0032_PL_121 Rev.C; DR_P0032_PL_131 Rev.C;  DR_P0032_PL_141 Rev A; DR_P0032_PL_142 Rev.B;  DR_P0032_SC_201 Rev.C; DR_P0032_SC_202 Rev.C;  DR_P0032_SC_203 Rev.C; DR_P0032_SC_204 Rev.C;</p> <p>Supporting documents:  Acoustic report by WSP dated Feb 2021;  Affordable Workspace Proposal;  Affordable Workspace Overview dated Nov 2021;  Air Quality Assessment by WSP dated Feb 2021;  Air Quality proforma;  Arboricultural report by WSP dated Feb 2021;  BREEAM Pre-assessment report by WSP dated Feb 2021;  Consolidated 2<sup>nd</sup> addendum by BPS dated 6/12/21  Cover letter by RPS dated 23/9/21;  Construction Management Plan proforma dated 16.2.21;  Design Statement by 6a Architects dated Feb 2021;  Daylight &amp; Sunlight Report by Point 2 Surveyors dated Feb 2021;  Letter from by Point 2 Surveyors dated 19/2/21;  Employment, Skills and Supply Plan  Energy Statement by WSP dated Feb 2021;  Financial Viability Assessment Report by Savills dated Nov 2021;  Fire Strategy Report by WSP dated Oct 2021;  Flood Risk Assessment &amp; Outline Drainage Strategy by WSP dated Feb 2021;  Sustainability: Flooding &amp; SUDS Letter from by WSP dated 3/9/2021;  Heritage Statement by Bridges Associates dated Feb 2021;  Landscaping Statement update by Djao-Rakitime dated Sept 2021;  Regeneration Statement by Quod dated Feb 2021;  Structural Stage 2 Report by WSP dated Feb 2021;  Sustainability Statement by WSP dated Feb 2021;  Statement of Community Involvement by Four Communications dated Feb 2021;  Townscape and Visual Assessment by Bridges Associates dated March 2021;  Transport Assessment by WSP dated Feb 2021;  Transport Assessment Addendum by WSP dated Sept 2021;  Travel Plan by WSP dated Feb 2021;  Waste Management by WSP dated Feb 2021 and  Delivery and Servicing Plan by WSP dated Feb 2021</p> <p>Reason: For the avoidance of doubt and in the interest of proper planning.</p>
3	<p><b>Detailed drawings / samples</b></p> <p>Detailed drawings, or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the local planning authority before the relevant part of the work is begun:</p>

	<p>a) Details including plans, coloured elevations and sections at 1:20 of all new windows (including jambs, head and cill), ventilation grills, external doors, screening, balustrades, parapets, planters and associated elements and lighting fixtures;</p> <p>b) Plan, coloured elevation and section drawings, including fascia, glazing panels of the new shopfronts and awnings at a scale of 1:20;</p> <p>c) Manufacturer's specification details of all facing materials (to be submitted to the Local Planning Authority) and samples of those materials (to be provided on site). Samples of materials to be provided at a suitable size (eg. 1x1m) and alongside all neighbouring materials;</p> <p>d) Plan, coloured elevation and section drawings of pillars and soffit to undercroft at a scale of 1:20;</p> <p>e) Plan, coloured elevation and section drawings of junction of floor plate with glazed front/rear elevation at a scale of 1:20;</p> <p>f) Plan, coloured elevation and section drawings of rooftop plant enclosure at a scale of 1:50. The height of the plant enclosure shall be no higher than that shown in the drawings hereby approved as an absolute maximum. All roof level plant machinery is to be housed within the drawn screening. No enlargement in height or footprint will be permitted, including all screening and lift over run unless otherwise agreed with the Council.</p> <p>g) Detailed drawings of rooftop pergola including materials and fixings</p> <p>h) Detailed drawings of rain water collection including gutters and downpipes</p> <p>The relevant part of the works shall be carried out in accordance with the details thus approved and all approved samples shall be retained on site during the course of the works.</p> <p>Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policies D1 and D2 of the Camden Local Plan 2017.</p>
4	<p><b>TfL London Underground Infrastructure Protection</b></p> <p>The development hereby permitted shall not be commenced until detailed design and method statements (in consultation with London Underground) for all of the foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent), have been submitted to and approved in writing by the local planning authority which:</p> <ul style="list-style-type: none"> <li>• provides demolition and foundation details on all structures</li> </ul>

	<ul style="list-style-type: none"> <li>• accommodate the location of the existing London Underground structures and tunnels-provide Impact Assessment</li> <li>• and mitigate the effects of noise and vibration arising from the adjoining operations within the structures and tunnels.</li> </ul> <p>The development shall thereafter be carried out in all respects in accordance with the approved design and method statements, and all structures and works comprised within the development hereby permitted which are required by the approved design statements in order to procure the matters mentioned in paragraphs of this condition shall be completed, in their entirety, before any part of the building hereby permitted is occupied.</p> <p>Reason: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with London Plan 2015 Table 6.1, draft London Plan policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012.</p>
5	<p><b>SuDS: Construction in accordance with details</b></p> <p>Prior to commencement of above-ground development, a lifetime maintenance plan including named maintenance specialist demonstrating how the sustainable drainage system as approved will be maintained submitted to and approved in writing by the local planning authority. The sustainable drainage system as approved from the Flood Risk Assessment and Outline Drainage Strategy by WSP dated February 2021 and WSP notes from 3/9/21 and 11/10/21, shall be installed as part of the development to accommodate all storms up to and including a 1:100 year storm with a 40% provision for climate change, such that flooding does not occur in any part of a building or in any utility plant susceptible to water and to achieve 2l/s run off rates. The system shall include a green roof area of 1387m<sup>2</sup> on the office building with 18.72m<sup>3</sup> capacity and blue roof area of 156m<sup>2</sup> on the residential building with 23.4m<sup>3</sup> capacity, as stated in the WSP note 11/10/21 and shall thereafter retained and maintained in accordance with the approved maintenance plan.</p> <p>Reason: To reduce the rate of surface water run-off from the buildings and limit the impact on the storm-water drainage system in accordance with policies CC2 and CC3 of the London Borough of Camden Local Plan Policies and Policy SI 13 of the London Plan 2021.</p>
6	<p><b>Lighting Strategy</b></p> <p>Prior to the first use of the office and commercial spaces in the building hereby approved, details of a lighting strategy shall be submitted to and approved in writing with the Local Planning Authority. The office or commercial areas shall not be used until the approved lighting strategy has been fully implemented and the lighting</p>

	<p>for the building shall thereafter be retained and used in accordance with the strategy.</p> <p>Reason: In order to ensure high quality building and streetscape, to prevent excessive light pollution and in the interests of visual amenity in accordance with policies A1, A3, D1 and D2 of the Camden Local Plan 2017.</p>
7	<p><b>Air Quality</b></p> <p>Prior to commencement, a detailed air quality assessment report, written in accordance with the relevant current guidance, for the existing site and proposed development shall be submitted to and approved by the Local Planning Authority.</p> <p>The development shall be at least “Air Quality Neutral” and an air quality neutral assessment for both buildings and transport shall be included in the report.</p> <p>The assessment shall assess the current baseline situation in the vicinity of the proposed development. The report shall include all calculations and baseline data, and be set out so that the Local Planning Authority can fully audit the report and critically analyse the content and recommendations.</p> <p>If required a scheme for air pollution design solutions or mitigation measures based on the findings of the report shall be submitted to and approved by the Local Planning Authority prior to development. This shall include mitigation for when air quality neutral transport and building assessments do not meet the benchmarks.</p> <p>The approved design or mitigation scheme shall be constructed and maintained in accordance with the approved details.</p> <p>Reason: To protect the amenity of residents in accordance with London Borough of Camden Local Plan Policy CC4 and London Plan policy SI 1.</p>
8	<p><b>Mechanical Ventilation with NO2 and PM Filtration</b></p> <p>Prior to occupation evidence that an appropriate NO2 and PM filtration system on the mechanical ventilation intake has been installed and a detailed mechanism to secure maintenance of this system should be submitted to the Local Planning Authority and approved in writing.</p>

	Reason: To protect the amenity of residents in accordance with London Borough of Camden Local Plan Policy CC4 and London Plan policy SI 1.
9	<p><b>Construction related impacts – Monitoring</b></p> <p>Air quality monitoring shall be implemented on site. No development shall take place until</p> <p>a. prior to installing monitors, full details of the air quality monitors have been submitted to and approved by the local planning authority in writing. Such details shall include the location, number and specification of the monitors, including evidence of the fact that they have been installed in line with guidance outlined in the GLA's Control of Dust and Emissions during Construction and Demolition Supplementary Planning Guidance;</p> <p>b. prior to commencement, evidence has been submitted demonstrating that the monitors have been in place for at least 3 months prior to the proposed implementation date.</p> <p>The monitors shall be retained and maintained on site for the duration of the development in accordance with the details thus approved.</p> <p>Reason: To safeguard the amenity of adjoining premises and the area generally in accordance with the requirements of policies A1 (Managing the impact of development) and CC4 (Air quality) of the London Borough of Camden Local Plan 2017.</p>
10	<p><b>Green/Blue Roof details</b></p> <p>Prior to commencement of above-ground development (excluding demolition and any site preparation works), full details in respect of the green and blue roofs in the areas indicated on the approved roof plan shall be submitted to and approved in writing by the local planning authority. Details of the green roofs provided shall include: species, planting density, substrate and a section at scale 1:20 showing that adequate depth is available in terms of the construction and long term viability of the green roof, as well as details of the maintenance programme for green roof. The buildings shall not be occupied until the approved details have been implemented and these works shall be permanently retained and maintained thereafter.</p> <p>Reason: In order to ensure the development undertakes reasonable measures to take account of biodiversity and the water environment in accordance with policies A3, CC2 and CC3 of the London Borough of Camden Local Plan.</p>
11	<b>Details of PV panels</b>

	<p>Prior to commencement of above ground works (excluding demolition and any site preparation works), drawings and data sheets showing the location, extent and predicted energy generation of photovoltaic cells and associated equipment to be installed on the building shall have been submitted to and approved by the Local Planning Authority in writing. The measures shall include the installation of a meter to monitor the energy output from the approved renewable energy systems. A site-specific lifetime maintenance schedule for each system, including safe roof access arrangements, shall be provided. The cells shall be installed in full accordance with the details approved by the Local Planning Authority and permanently retained and maintained thereafter.</p> <p>Reason: To ensure the development provides adequate on-site renewable energy facilities in accordance with the requirements of policies CC1 and CC2 of the Camden Local Plan 2017.</p>
12	<p><b>Air source heat pump details</b></p> <p>Prior to commencement of above ground works (excluding demolition and any site preparation works), details, drawings and data sheets showing the location, Seasonal Performance Factor of at least 2.5 and Be Green stage carbon saving of the air source heat pumps and associated equipment to be installed on the building, shall have been submitted to and approved by the Local Planning Authority in writing. The measures shall include the installation of a metering details including estimated costs to occupants and commitment to monitor performance of the system post construction. A site-specific lifetime maintenance schedule for each system, including safe access arrangements, shall be provided. The equipment shall be installed in full accordance with the details approved by the Local Planning Authority and permanently retained and maintained thereafter.</p> <p>Reason: To ensure the development provides adequate on-site renewable energy facilities in accordance with the requirements of policy CC1 of the London Borough of Camden Local Plan 2017.</p>
13	<p><b>Energy monitoring</b></p> <p>In order to demonstrate compliance with the 'be seen' post-construction monitoring requirement of Policy SI 2 of the London Plan, the legal Owner shall at all times and all in all respects comply with the energy monitoring requirements set out in points a, b and c below. In the case of non-compliance the legal Owner shall upon written notice from the Local Planning Authority immediately take all steps reasonably required to remedy non-compliance.</p> <p>a. Within four weeks of planning permission being issued by the Local Planning Authority, the Owner is required to submit to the GLA accurate and verified estimates of the 'be seen' energy performance indicators, as outlined in Chapter 3 'Planning stage' of the GLA 'Be</p>

	<p>seen' energy monitoring guidance document, for the consented development. This should be submitted to the GLA's monitoring portal in accordance with the 'Be seen' energy monitoring guidance.</p> <p>b. Once the as-built design has been completed (upon commencement of RIBA Stage 6) and prior to the building(s) being occupied (or handed over to a new legal owner, if applicable), the legal Owner is required to provide updated accurate and verified estimates of the 'be seen' energy performance indicators for each reportable unit of the development, as per the methodology outlined in Chapter 4 'As-built stage' of the GLA 'Be seen' energy monitoring guidance. All data and supporting evidence should be uploaded to the GLA's monitoring portal. The owner should also confirm that suitable monitoring devices have been installed and maintained for the monitoring of the in-use energy performance indicators, as outlined in Chapter 5 'In-use stage' of the GLA 'Be seen' energy monitoring guidance document.</p> <p>c. Upon completion of the first year of occupation following the end of the defects liability period (DLP) and for the following four years, the legal Owner is required to provide accurate and verified annual in-use energy performance data for all relevant indicators under each reportable unit of the development as per the methodology outlined in Chapter 5 'In-use stage' of the GLA 'Be seen' energy monitoring guidance document. All data and supporting evidence should be uploaded to the GLA's monitoring portal. This condition will be satisfied after the legal Owner has reported on all relevant indicators included in Chapter 5 'In-use stage' of the GLA 'Be Seen' energy monitoring guidance document for at least five years.</p> <p>Reason: In order to ensure that actual operational energy performance is minimised and demonstrate compliance with the 'be seen' post-construction monitoring requirement of Policy SI 2 of the London Plan 2021.</p>
14	<p><b>Construction and Demolition Waste</b></p> <p>Prior to commencement of development, a resource management plan shall be submitted including a pre-demolition audit and demonstrating how 95% of construction and demolition waste will be reused/recycled/recovered and 95% of excavation waste used for beneficial purposes. The plan shall be thereafter be delivered in accordance with the approved details.</p> <p>Reason: To ensure all development optimise resource efficiency in accordance with policy CC1 of the London Borough of Camden Local Plan Policies and to reduce waste and support the circular economy in accordance with policy SI 7 of the London Plan 2021.</p>
15	<p><b>Active frontage</b></p>



	<p>Prior to occupation an active frontage strategy for the ground floor windows fronting Kentish Town Road shall be submitted to and approved in writing by the local planning authority. Details to include how an active frontage will be maintained through activities and displays. Details of any window coverings should be provided.</p> <p>The active frontage shall be retained in line with the approved details.</p> <p>Reason: To safeguard the character, function, vitality and viability of the area and to secure an active frontage to assist with passive surveillance and pedestrian activity along Kentish Town Road in accordance with policies G1, A1, TC1, TC2 and TC4 of the Camden Local Plan 2017.</p>
16	<p><b>Waste storage / removal</b></p> <p>At least six months prior to completion, details of the location, design and method of waste storage and removal including recycled materials, shall be submitted to and approved by the local planning authority in writing. The facility as approved shall be provided prior to the first occupation of any of the new units and permanently retained thereafter.</p> <p>Reason: To ensure that sufficient provision for the storage and collection of waste has been made in accordance with the requirements of policies A1 and CC5 of the Camden Local Plan 2017.</p>
17	<p><b>Landscaping details</b></p> <p>Prior to commencement of above-ground development (excluding demolition and any site preparation works), full details in respect of all hard and soft landscaping including to ground floor and the terraces at fourth floor, fifth floor and roof level, shall be submitted to and approved in writing by the local planning authority. Details shall include species, indicative images and details of the maintenance programme. The building shall not be occupied until the approved details have been implemented and these works shall be permanently retained and maintained thereafter.</p> <p>Reason: In order to ensure the development undertakes reasonable measures to take account of biodiversity and the water environment in accordance with policies A3, CC2 and CC3 of the London Borough of Camden Local Plan policies.</p>
18	<p><b>Cycle parking</b></p> <p>Prior to first occupation of the development, full details of the following shall be submitted to and approved by the local planning authority:</p> <ul style="list-style-type: none"> <li>at least 114 long stay cycle spaces for the office and commercial elements, including 8 spaces allocated for non-standard cycles;</li> </ul>

	<ul style="list-style-type: none"> <li>• staff lockers, showering facilities;</li> <li>• accessible door widths of 1.2m for all doors on route to the cycle parking;</li> <li>• at least 37 short stay spaces including 2 spaces allocated for non-standard cycles).</li> </ul> <p>The approved cycle parking shall thereafter be provided in its entirety prior to the first occupation of any part of development, and permanently retained thereafter.</p> <p>Reason: To ensure the development provides adequate cycle parking facilities in accordance with the requirements of policies T1 and T2 of the Camden Local Plan 2017.</p>
19	<p><b>Bird and bat boxes</b></p> <p>Prior to first occupation of the development a plan showing details of bird and bat box locations and types and indication of species to be accommodated shall be submitted to and approved in writing by the local planning authority. The boxes shall be installed in accordance with the approved plans prior to the occupation of the development and thereafter retained.</p> <p>Reason: In order to secure appropriate features to conserve and enhance wildlife habitats and biodiversity measures within the development, in accordance with the requirements of policy A3 of the Camden Local Plan 2017.</p>
20	<p><b>Obscure glazing</b></p> <p>Prior to first occupation of the development the glazing on the rear elevation of Grand Union House at first and second floor, beneath the pergola rooftop garden and facing Barnes House, shall be obscure glazed as shown on drawing 1310 Rev.P1 (labelled "Curtain wall with acid-etched translucent glass"). The obscure glazing shall be permanently retained thereafter.</p> <p>Reason: In order to prevent unreasonable overlooking of neighbouring premises in accordance with the requirements of policies A1 and D1 of the London Borough of Camden Local Plan 2017.</p>
21	<p><b>Noise standards</b></p> <p>The design and structure of the development shall be of such a standard that it will protect residents within the same building or in adjoining buildings from noise and vibration from the development, so that they are not exposed to noise levels indoors of more than 35 dBLAeq 16 hrs daytime and of more than 30 dB LAeq 8 hrs in bedrooms at night.</p>

	<p>Reason: To safeguard the amenities of neighbouring noise sensitive receptors in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.</p>
22	<p><b>Noise standards</b></p> <p>Prior to commencement of the development, details shall be submitted to and approved in writing by the Council, of an enhanced sound insulation value DnT,w and L'nT,w of at least 5dB above the Building Regulations value, for the floor/ceiling/wall structures in the residential units, separating different types of rooms/ uses in adjoining dwellings, . Approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.</p> <p>Reason: To ensure that the amenity of occupiers of the development site is not adversely affected by noise in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.</p>
23	<p><b>Noise standards</b></p> <p>Prior to commencement of installation of any plant equipment, including any on the office, commercial, or residential elements of the development, full details (including plans, elevations, manufacturer specifications and sections) of the proposed plant equipment and enclosure shall be submitted to and approved in writing by the Local Planning Authority. The details shall include the external noise level emitted from plant/ machinery/ equipment and mitigation measures as appropriate. The measures shall ensure that the external noise level emitted from plant, machinery/ equipment will be lower than the typical background noise level by at least 10dBA, by 15dBA where the source is tonal, as assessed according to BS4142:2014 at the nearest and/or most affected noise sensitive premises, with all machinery operating together at maximum capacity. Approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.</p> <p>Reason: To safeguard the amenities of neighbouring noise sensitive receptors in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.</p>
24	<p><b>Noise standards</b></p> <p>Prior to use, machinery, plant or equipment and ducting at the development shall be mounted with proprietary anti-vibration isolators and fan motors shall be vibration isolated from the casing and adequately silenced and maintained as such.</p>

	<p>Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.</p>
25	<p><b>Delivery and refuse items</b></p> <p>All refuse and recycling bins, delivery cages, trolleys and any other items linked to deliveries and collection in association with the development hereby permitted are to be stored within the buildings and only brought out onto the public highway when deliveries are being made or refuse collected and returned to within the building immediately thereafter.</p> <p>Reason: In the interests of visual amenity and to prevent obstruction and inconvenience to users of the public highways, in accordance with policies A1, CC5 and T1 of the Camden Local Plan 2017.</p>
26	<p><b>Office terraces hours of use</b></p> <p>The use of the roof terrace at fourth floor associated with the office use shall not be carried out outside the following times 07:00-21:00 Mondays to Saturdays and not on Sundays and Bank Holidays.</p> <p>Reason: To safeguard the amenities of the nearest residential properties and the area generally in accordance with the requirements of policies G1, A1 and A4 of the London Borough of Camden Local Plan 2017.</p>
27	<p><b>No audible music played on office terrace</b></p> <p>No music shall be played on the office premises (including on the roof terraces) in such a way as to be audible within any adjoining premises or on the adjoining highway.</p> <p>Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies G1, D1, A1, and A4 of the London Borough of Camden Local Plan 2017.</p>
28	<p><b>External fixtures</b></p> <p>No lights, meter boxes, flues, vents or pipes, and no telecommunications equipment, alarm boxes, television aerials, satellite dishes or rooftop 'mansafe' rails shall be fixed or installed on the external face of the buildings, without the prior approval in writing of the local planning authority.</p> <p>Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policies D1 and D2 of the Camden Local Plan 2017.</p>

29	<p><b>Accessible and adaptable dwellings</b></p> <p>All units hereby approved shall be designed and constructed in accordance with Building Regulations Part M4 (2) with one unit (the one-bed unit on the first floor) designed and constructed in accordance with Building Regulations Part M4 (3) adaptable, as shown on the approved plans.</p> <p>Reason: To ensure that the internal layout of the building provides flexibility for the accessibility of future occupiers and their changing needs over time, in accordance with the requirements of policy H6 of the Camden Local Plan 2017.</p>
30	<p><b>Public café</b></p> <p>The proposed ground floor commercial unit adjoining the office lobby, and labelled as 'retail' on the approved plan, shall be retained in this location and remain accessible to members of the public during all hours of opening.</p> <p>Reason: To safeguard the character, function, vitality and viability of the area in accordance with policies G1, TC1 and TC3 of the Camden Local Plan 2017.</p>
31	<p><b>Non-road mobile machinery</b></p> <p>All non-road mobile machinery (any mobile machine, item of transportable industrial equipment, or vehicle - with or without bodywork) of net power between 37kW and 560kW used on the site for the entirety of the demolition and phases of the development hereby approved shall be required to meet Stage IIIA of EU Directive 97/68/EC. The site shall be registered on the NRMM register for the demolition and construction phases of the development.</p> <p>Reason: To safeguard the amenities of the adjoining occupiers, the area generally and contribution of developments to the air quality of the borough in accordance with the requirements of policies CC1, CC2 and CC4 of the Camden Local Plan 2017.</p>
32	<p><b>Water use</b></p> <p>The development hereby approved shall achieve a maximum internal water use of 105litres/person/day. The dwellings shall not be occupied until the Building Regulation optional requirement has been complied with.</p> <p>Reason: To ensure the development contributes to minimising the need for further water infrastructure in an area of water stress in</p>

	accordance with policies CC1, CC2 and CC3 of the Camden Local Plan 2017.
33	<p><b>External doors</b></p> <p>All external doorways, except for fire doors or for access to utilities, should not open outwards towards the public highway / footway / courtyard spaces. The proposed doors must either open inwards or have a sliding door so they do not restrict the flow of pedestrians or risk being opened onto those passing by.</p> <p>Reason: In order to enhance the free flow of pedestrian movement and promote highway safety and amenity in accordance with policies D1 and T1 of the Camden Local Plan 2017.</p>
34	<p><b>Fire strategy</b></p> <p>The development shall be implemented in accordance with approved fire strategy.</p> <p>Reason: In order to provide a safe and secure development in accordance with policy D12 of the Publication London Plan 2020.</p>
35	<p><b>Advertisements</b></p> <p>Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 2015 and the Town and Country Planning (Control of Advertisements) Regulations 2007 (or any orders or regulations revoking and re-enacting those instruments, with or without modification), no advertisements shall be placed on the building externally or internally, so that they are visible from outside the building, until details of those advertisements have first been submitted to and approved in writing by the local authority. Advertisements shall thereafter be displayed in full accordance with the approved details, including any specified limited period for display.</p> <p>Reason: To ensure that an active frontage is retained and reduce the amount of visual clutter on the building, and protect its appearance, in accordance with policies G1, A1, D4, TC1, TC2 and TC4 of the Camden Local Plan 2017.</p>
36	<b>Class E (g) use</b>

	<p>Notwithstanding the provisions of the Town and Country Planning (Use Classes) Order 1987 or the Town and Country Planning (General Permitted Development) Order 2015 (or any orders revoking and re-enacting those orders with or without modification), the areas shown on the approved plans as 'office', and 'office lobby', shall only be used for purposes within Use Classes E(g) (offices, research and development, or light industry), or a mix of those uses, and for no other purposes whatsoever.</p> <p>Reason: To safeguard future employment sites and premises in the borough that meet the needs of industry and knowledge quarter and other employers and to safeguard the amenity of the future and existing occupiers of the development site in accordance with policies G1, A1, E1 and E2 of the Camden Local Plan 2017.</p>
37	<p><b>Class E flexible use a, b and c</b></p> <p>Notwithstanding the provisions of the Town and Country Planning (Use Classes) Order 1987 or the Town and Country Planning (General Permitted Development) Order 2015 (or any orders revoking and re-enacting those orders with or without modification), the ground floor units marked on the ground floor plans as "retail" shall only be used for purposes within Use Classes E(a), (b), and (c) (retail, food and drink, and professional services), or a mix of those uses, and for no other purposes whatsoever.</p> <p>Reason: To safeguard the character, function, vitality and viability of the area and to secure an active frontage to assist with passive surveillance and pedestrian activity along Kentish Town Road in accordance with policies G1, A1, TC1, TC2 and TC4 of the Camden Local Plan 2017.</p>

## 29 Informatives

1	<p>This proposal may be liable for the Mayor of London's Community Infrastructure Levy (CIL) and the Camden CIL. Both CILs are collected by Camden Council after a liable scheme has started, and could be subject to surcharges for failure to assume liability or submit a commencement notice PRIOR to commencement. We issue formal CIL liability notices setting out how much you may have to pay once a liable party has been established. CIL payments will be subject to indexation in line with construction costs index. You can visit our planning website at <a href="http://www.camden.gov.uk/cil">www.camden.gov.uk/cil</a> for more information, including guidance on your liability, charges, how to pay and who to contact for more advice.</p>
2	<p>Your proposals may be subject to control under the Building Regulations and/or the London Buildings Acts that cover aspects including fire and emergency escape, access and facilities for people with disabilities and sound insulation between dwellings. You are advised to consult the Council's Building Control Service, Camden Town Hall, Judd St, Kings Cross, London NW1 2QS (tel: 020-7974 6941).</p>



3	<p>Your proposals may be subject to control under the Party Wall etc Act 1996 which covers party wall matters, boundary walls and excavations near neighbouring buildings. You are advised to consult a suitably qualified and experienced Building Engineer.</p>
4	<p>All works should be conducted in accordance with the Camden Minimum Requirements - a copy is available on the Council's website at <a href="https://beta.camden.gov.uk/documents/20142/1269042/Camden+Minimum+Requirements+%281%29.pdf/bb2cd0a2-88b1-aa6d-61f9-525ca0f71319">https://beta.camden.gov.uk/documents/20142/1269042/Camden+Minimum+Requirements+%281%29.pdf/bb2cd0a2-88b1-aa6d-61f9-525ca0f71319</a> or contact the Council's Noise and Licensing Enforcement Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No. 020 7974 4444)</p> <p>Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. You must secure the approval of the Council's Noise and Licensing Enforcement Team prior to undertaking such activities outside these hours.</p>
5	<p>This approval does not authorise the use of the public highway. Any requirement to use the public highway, such as for hoardings, temporary road closures and suspension of parking bays, will be subject to approval of relevant licence from the Council's Streetworks Authorisations &amp; Compliance Team London Borough of Camden 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No 020 7974 4444) . Licences and authorisations need to be sought in advance of proposed works. Where development is subject to a Construction Management Plan (through a requirement in a S106 agreement), no licence or authorisation will be granted until the Construction Management Plan is approved by the Council.</p>
6	<p>This permission is granted without prejudice to the necessity of obtaining consent under the Town and Country Planning (Control of Advertisements) (England) Regulations 2007. Application forms may be obtained from the Council's website, <a href="http://www.camden.gov.uk/planning">www.camden.gov.uk/planning</a> or the Camden Contact Centre on Tel: 020 7974 4444 or email <a href="mailto:env.devcon@camden.gov.uk">env.devcon@camden.gov.uk</a>).</p>
7	<p>Your attention is drawn to the fact that there is a separate legal agreement with the Council which relates to the development for which this permission is granted. Information/drawings relating to the discharge of matters covered by the Heads of Terms of the legal agreement should be marked for the attention of the Planning Obligations Officer, Sites Team, Camden Town Hall, Argyle Street, WC1H 8EQ.</p>

8	Mitigation measures to control construction-related air quality impacts should be secured within the Construction Management Plan as per the standard CMP Pro-Forma. The applicant will be required to complete the checklist and demonstrate that all mitigation measures relevant to the level of identified risk are being included.
9	All references to use classes within this permission are to the use classes as stated in the Town and Country Planning (Use Classes) Order 1987 as at 31 August 2020.
10	It is recommended that the residential units achieve 'Secured by Design – Silver' accreditation. You can find further information about 'Secured by Design' by reading the following guide: <a href="https://www.securedbydesign.com/images/downloads/HOMES_BROCHURE_2019.pdf">https://www.securedbydesign.com/images/downloads/HOMES_BROCHURE_2019.pdf</a>
13	The correct street number or number and name must be displayed permanently on the premises in accordance with regulations made under Section 12 of the London Building (Amendments) Act 1939.
14	Under Section 25 of the GLC (General Powers) Act 1983, the residential accommodation approved is not permitted for use as holiday lettings or any other form of temporary sleeping accommodation defined as being occupied by the same person(s) for a consecutive period of 90 nights or less. If any such use is intended, then a new planning application will be required which may not be approved

## **APPENDIX 1 – Financial Viability Appraisal by BPS – consolidated 2<sup>nd</sup> addendum**

**Grand Union House,  
20 Kentish Town Road,  
Camden NW1 9NX  
Consolidated 2<sup>nd</sup> Addendum**

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Prepared on behalf of London Borough of Camden

6<sup>th</sup> December 2021

2020/5557/PRE  
2021/0911/P



215a High Street, Dorking, RH4 1RU  
[www.bps-surveyors.co.uk](http://www.bps-surveyors.co.uk)  
Tel: 01483 565 433

## 1.0 INTRODUCTION

- 1.1 BPS Chartered Surveyors have been instructed by the London Borough of Camden ('the Council') to comment on Savills' response, dated 24<sup>th</sup> September to the BPS Addendum of 25<sup>th</sup> July 2021 on the above scheme and present the position subsequently agreed between the respective parties.
- 1.2 Our initial April 2021 report was issued in response to Savills' Financial Viability Assessment (FVA) dated February 2021, prepared on behalf of Sellar Developments ('the Applicant') in connection with a planning application for the redevelopment of the above site. Our original report was followed by a rebuttal from Savills in May 2021.
- 1.3 This addendum should therefore be read in conjunction with the above reports. We confirm that we have not been instructed to review Savills' report dated November 2021.
- 1.4 In our last report we considered the BLV appraisal by reference to two scenarios, Scenario A (assuming that the property is presented in its current condition) and Scenario B (assuming that the property is presented in its pre strip-out condition). We note below the matters that remained outstanding between the parties at the date of our July 2021 report were as follows:

	Savills		BPS			
	100% Private Housing	100% Affordable Housing	Scenario A 100% Private Housing	Scenario A 100% Affordable Housing	Scenario B 100% Private Housing	Scenario B 100% Affordable Scenario
BLV	£9,520,000	£9,520,000	£3,069,000	£3,069,000	£6,980,000	£6,980,000
Private resi GDV	£3,690,000	-	£3,840,000	-	£3,840,000	-
AH GDV	-	£1,343,570	-	£1,343,570	-	£1,343,570
Retail GDV	£1,200,000	£1,200,000	£1,200,000	£1,200,000	£1,200,000	£1,200,000
Office GDV	£58,281,310	£58,281,310	£58,281,310	£58,281,310	£58,281,310	£58,281,310
Total GDV	£63,171,310	£60,824,880	£63,321,310	£60,824,880	£63,321,310	£60,824,880
Finance Rate	6.75%	6.75%	6.50%	6.50%	6.50%	6.50%
Developer Profit	15.30%	14.82%	15.15%	14.80%	15.15%	14.80%
Surplus/Deficit	<b>£770,000</b>	<b>£420,000</b>	<b>£6,397,384</b>	<b>£4,838,956</b>	<b>£1,514,772</b>	<b>£42,436</b>

- 1.5 The BPS July 2021 report conclusions included:

*We conclude that the proposed scheme with 100% Affordable Housing shows a significant surplus of £4,838,956 (under Scenario A) and a small deficit of £42,436 (under Scenario B).*

*We are of the view, therefore, that the scheme is likely to remain viable delivering 100% Affordable Housing in addition to the commercial space proposed. We revert to the Planning Officer's judgement and knowledge of the history of the site to recommend which Scenario is the most appropriate.*

- 1.6 This addendum summarises the position now agreed with Savills and provides comment upon the inputs agreed to assess the viability position. We have addressed each of the previously outstanding points in turn.
- 1.7 In addition, the Affordable Housing has now been agreed as Camden Intermediate Rent and an additional Affordable Workspace provision has also been agreed and this now forms part of our analysis below.

## 2.0 SUMMARY OF PREVIOUSLY OUTSTANDING POINTS

- 2.1 Savills have provided revised costs of £30.54m reportedly to reflect construction cost inflation. Our Cost Consultants have reviewed their figures.
- 2.2 Savills contest BPS' use of Scenario A which illustrates the BLV assuming that the property is presented in its current condition.
- 2.3 Savills contend that Scenario B (condition before strip out) is more appropriate because the landowner is not seeking to benefit financially from the strip out but was simply preparing the property for redevelopment. Savills have now provided new expenditure figures and documentary evidence supporting this claim which confirm that the landowner has expended considerable sums in management, maintenance and repair etc, rather than simply having allowed the property to be run down.
- 2.4 We have reviewed this additional information and consider that it provides adequate proof of intention, we have therefore agreed to base our benchmark figure on Scenario B in consequence.
- 2.5 Based on this change of approach the Affordable Housing offer has now been amended and agreed with the Council.
- 2.6 Provision of Affordable Workspace has also been agreed with the Council.
- 2.7 The Council have confirmed updated s106 costs of £441,558 which have now been incorporated into our appraisal.



### 3.0 DEVELOPMENT COSTS

- 3.1 Savills have provided updated costs prepared by Core 5 as at 3Q 2021. These costs have been reviewed by our Cost Consultants, Geoffrey Barnett Associates ('GBA').
- 3.2 Previously accepted costs for 1Q 2021 were £27,583,500 including 5% contingency. Updated costs in Core 5's Cost Plan for 3Q 2021 are £30,540,000 which includes 7.50% contingency.
- 3.3 GBA advise that 5.00% contingency is appropriate for the proposed scheme. They further advise that the All-in-One TPI to 4Q 2021 (the date of GBA's report) represents a 5.18% increase from 1Q 2021.
- 3.4 GBA therefore make the following conclusion:

*We conclude the updated construction costs at £29,830,500 are £817,367 higher than expectation. [Note this figure is inclusive of contingency]*

*There has been an increase in construction costs influenced by shortage of materials and labour, however the current increase in BCIS All-in -One Tender Price Indices (TPI) is 5.18% since 1Q 2021 which is lower than the proposed 8.15%.*

- 3.5 We have therefore re-run our appraisal with a base construction cost of £27,631,555 to which we have added a 5% contingency, in line with GBA's advice. Their full report is included in Appendix 2.

#### **4.0 BENCHMARK LAND VALUE**

- 4.1 Savills have rejected our proposed use Scenario A (current condition) BLV of £3.069m and appear to support a BLV of £6,980,000 which is in line with our previous assessment of Scenario B (pre strip-out condition).
- 4.2 We note the significant additional expenditure of £573,000 claimed by the applicant over a four year period since July 2017, which has now been fully evidenced. We therefore accept the use of Scenario B in this instance to calculate BLV.
- 4.3 The parties have agreed an EUV+ approach is appropriate to assess the BLV. We note the £1,816,000 third party enabling costs which we have deducted from the 20% Landowner Premium, resulting in an agreed BLV of £7.33m.

## 5.0 PROPOSED AFFORDABLE HOUSING

- 5.1 We have received instructions from the Council to review a scenario with 100% Affordable Housing offered as Camden Intermediate Rent.
- 5.2 For the CIR assessment, we have assumed no average rental growth and have discounted the cashflow over a 60 year period (after deductions for management, maintenance, repairs and voids/bad debts). We have based our calculations on our own cashflow and on the weekly rent benchmarks below, agreed between the parties:

	2021/22
1 bedroom	£229
2 bedrooms	£269

- 5.3 We calculate the residential element of the proposed scheme, offered as CIR, has a total GDV of £1,497,146 (£365.07 psf).
- 5.4 We do recommend, however, that this value is reviewed in the light of an RP offer, in line with best practice.

## **7.0 PROPOSED AFFORDABLE WORKSPACE**

- 7.1 We have instructions from the Council to review a scenario which includes 5% of the total office space (333 sq m GIA) to be let at 70% of the Market Rent for 10 years, at which point it will return to Market Rent levels.
- 7.2 This results in a revised GDV for the total office element of the proposed scheme of £57,655,169.

**8.0 APPRAISAL RESULTS AND CONCLUSION**

- 8.1 We therefore present below the viability position now agreed between ourselves and Savills which reflects 100% Affordable Housing offered as CIR, plus 5% Affordable Workspace. We have included our revised appraisal in Appendix 1 which demonstrates a small deficit. Scenario Analysis (also provided in Appendix 1) shows that only minor shifts in income and revenue are required to erode this surplus.
- 8.2 We have summarised below the current position of the respective parties, in relation to Scenario B with 100% Affordable Housing:

100% AH 5% AW	Agreed Position
BLV	£7,330,000
Total GDV	£60,524,169
Finance Rate	6.50%
Developer Profit	14.14%
Surplus/ Deficit	<b>-£3,494</b>

- 8.3 We conclude that the proposed scheme with 100% Affordable Housing (CIR) and 5% Affordable Workspace, shows a nominal deficit of £3,494. We are of the view, therefore, that the scheme is marginally unviable at the proposed level of Affordable space and is incapable of viably offering additional Affordable Housing or Workspace.
- 8.4 We note from the scenario analysis that the deficit is marginal and recommend that the viability position is subject to review as part of the s106 Agreement.

## 10.0 QUALITY STANDARDS CONTROL

This report is provided for the stated purpose and for the sole use of the named clients. This report may not, without written consent, be used or relied upon by any third party.

The author(s) of this report confirm that there are no conflicts of interest and measures have been put in place to prevent the risk of the potential for a conflict of interest. In accordance with the RICS Professional Statement *Financial Viability in Planning: Conduct and Reporting* September 2019, this report has been prepared objectively, impartially, and with reference to all appropriate sources of information.

The following persons have been involved in the production of this report:



**Clare Jones**  
RICS Membership no. 0095561  
For and on behalf of BPS  
Chartered Surveyors



**Andrew Jones MRICS**  
RICS Membership no. 0085834  
For and on behalf of BPS  
Chartered Surveyors

## 11.0 LIMITATION OF LIABILITY/ PUBLICATION

This report is provided for the stated purpose and for the sole use of the named clients. It is confidential to the clients and their professional advisors and BPS Chartered Surveyors accepts no responsibility whatsoever to any other person.

Neither the whole nor any part of this valuation report nor any reference hereto may be included in any published document, circular, or statement, or published in any way, without prior written approval from BPS of the form and context in which it may appear.

The outbreak of the Novel Coronavirus (COVID-19), declared by the World Health Organisation as a “Global Pandemic” on 11 March 2020, has impacted global financial markets. Travel restrictions have been implemented by many countries.

Market activity is being impacted in many sectors. As at the valuation date, we\*\* consider that we can attach less weight to previous market evidence for comparison purposes, to inform opinions of value. Indeed, the current response to COVID-19 means that we are faced with an unprecedented set of circumstances on which to base a judgement.

Our valuation(s) is / are therefore reported on the basis of ‘material valuation uncertainty’ as per VPS 3 and VPGA 10 of the RICS Red Book Global. Consequently, less certainty - and a higher degree of caution - should be attached to our valuation than would normally be the case. Given the unknown future impact that COVID-19 might have on the real estate market, we recommend that you keep the valuation of [this property] under frequent review.

## Appendix 1: BPS Appraisal

Grand Union House v3

Camden

Commercial + Aff workspace + Affordable Homes CIR

Scenario B - Pre Strip-out Condition Assumed



**APPRAISAL SUMMARY****BPS SURVEYORS**

**Grand Union House v3**  
**Camden**  
**Commercial + Aff workspace + Affordable Homes CIR**

**Appraisal Summary for Phase 1**

Currency in £

**REVENUE**

<b>Sales Valuation</b>	<b>Units</b>	<b>ft²</b>	<b>Sales Rate ft²</b>	<b>Unit Price</b>	<b>Gross Sales</b>
Affordable Residential	6	4,101	289.17	197,648	1,185,886

**Rental Area Summary**

	<b>Units</b>	<b>ft²</b>	<b>Rent Rate ft²</b>	<b>Initial MRV/Unit</b>	<b>Net Rent at Sale</b>	<b>Initial MRV</b>
Market Office	1	54,156	55.00	2,978,580	2,978,580	2,978,580
Retail	3	2,540	30.00	25,400	76,200	76,200
Aff Workspace Reversion	1	2,850	55.00	156,750	156,750	156,750
<b>Totals</b>	<b>5</b>	<b>59,546</b>			<b>3,211,530</b>	<b>3,211,530</b>

**Investment Valuation****Market Office**

Market Rent	2,978,580	YP @	5.0000%	20.0000	
(1yr 6mths Rent Free)		PV 1yr 6mths @	5.0000%	0.9294	55,367,551

**Retail**

Market Rent	76,200	YP @	6.0000%	16.6667	
(1yr Rent Free)		PV 1yr @	6.0000%	0.9434	1,198,113

**Aff Workspace Reversion**

Market Rent	156,750	YP @	5.0000%	20.0000	
(10yrs Rent Free)		PV 10yrs @	5.0000%	0.6139	1,924,618

**Aff Workspace Term**

Manual Value					848,000
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**Total Investment Valuation****59,338,282****GROSS DEVELOPMENT VALUE****60,524,169**

Purchaser's Costs		(4,035,003)	
Effective Purchaser's Costs Rate	6.80%		(4,035,003)

**NET DEVELOPMENT VALUE****56,489,165****NET REALISATION****56,489,165****OUTLAY****ACQUISITION COSTS**

Fixed Price	7,330,000		
Fixed Price		7,330,000	
			7,330,000
Stamp Duty		356,000	
Effective Stamp Duty Rate	4.86%		
Agent Fee	1.00%	73,300	
Legal Fee	0.80%	58,640	
			487,940

**CONSTRUCTION COSTS**

<b>Construction</b>	<b>ft²</b>	<b>Build Rate ft²</b>	<b>Cost</b>
Construction Costs	79,966	345.54	27,631,555
Contingency		5.00%	1,381,578
Third Party Payment			1,816,000
			30,829,133

**Section 106 Costs**

Borough CIL		126,144	
Mayoral CIL		315,360	
S106		441,558	
			883,062

**PROFESSIONAL FEES**

**APPRAISAL SUMMARY****BPS SURVEYORS****Grand Union House v3****Camden****Commercial + Aff workspace + Affordable Homes CIR**

Professional Fees	12.00%	3,481,576	3,481,576
<b>MARKETING &amp; LETTING</b>			
Letting Agent Fee	10.00%	305,478	
Letting Legal Fee	5.00%	152,739	458,217
<b>DISPOSAL FEES</b>			
Sales Agent Fee	1.00%	564,892	
Sales Legal Fee	0.50%	282,446	847,337
<b>MISCELLANEOUS FEES</b>			
Developer Profit Commercial	15.00%	8,484,850	
Developer Profit Affordable Housing	6.00%	71,153	8,556,003
<b>FINANCE</b>			
Debit Rate 6.500%, Credit Rate 0.100% (Nominal)			
Land		1,318,498	
Construction		2,300,894	
Total Finance Cost			3,619,392
<b>TOTAL COSTS</b>			<b>56,492,660</b>
<b>PROFIT</b>			<b>(3,494)</b>

**Performance Measures**

Profit on Cost%	-0.01%
Profit on GDV%	-0.01%
Profit on NDV%	-0.01%
Development Yield% (on Rent)	5.68%
Equivalent Yield% (Nominal)	5.02%
Equivalent Yield% (True)	5.18%
IRR% (without Interest)	6.23%
Profit Erosion (finance rate 6.500)	N/A

Grand Union House v3

Camden

Commercial + Aff workspace + Affordable Homes CIR

### Table of Profit Amount and Gross Development Value

Rent: Rate /ft <sup>2</sup>					
Construction: Rate /ft <sup>2</sup>	-10.000%	-5.000%	0.000%	+5.000%	+10.000%
-10.000%	-£1,031,542	£1,206,067	£3,443,676	£5,681,285	£7,918,895
310.99 /ft <sup>2</sup>	£54,675,140	£57,599,655	£60,524,169	£63,448,683	£66,373,197
-5.000%	-£2,755,127	-£517,518	£1,720,091	£3,957,700	£6,195,309
328.26 /ft <sup>2</sup>	£54,675,140	£57,599,655	£60,524,169	£63,448,683	£66,373,197
0.000%	-£4,478,712	-£2,241,103	-£3,494	£2,234,115	£4,471,724
345.54 /ft <sup>2</sup>	£54,675,140	£57,599,655	£60,524,169	£63,448,683	£66,373,197
+5.000%	-£6,202,298	-£3,964,689	-£1,727,079	£510,530	£2,748,139
362.82 /ft <sup>2</sup>	£54,675,140	£57,599,655	£60,524,169	£63,448,683	£66,373,197
+10.000%	-£7,925,883	-£5,688,274	-£3,450,665	-£1,213,056	£1,024,553
380.10 /ft <sup>2</sup>	£54,675,140	£57,599,655	£60,524,169	£63,448,683	£66,373,197

### Sensitivity Analysis : Assumptions for Calculation

#### Rent: Rate /ft<sup>2</sup>

Original Values are varied by Steps of 5.000%.

Heading	Phase	Rate	No. of Steps
Market Office	1	£55.00	2.00 Up & Down
Retail	1	£30.00	2.00 Up & Down
Aff Workspace Reversion	1	£55.00	2.00 Up & Down

#### Construction: Rate /ft<sup>2</sup>

Original Values are varied by Steps of 5.000%.

Heading	Phase	Rate	No. of Steps
Construction Costs	1	£345.54	2.00 Up & Down

## Appendix 2: GBA Report

**REPORT 19 OCTOBER 2021**

**1.0 REVIEW & COMMENTARY:**

- 1.1 We have previously reported on this scheme in April 2021. We accepted construction costs on condition that contingency is reduced to 5%.
- 1.2 This Report is related to construction costs in Core Five Planning Cost Plan updated for 3Q2021 prices.
- 1.3 Accepted construction costs (1Q2021) were as follows:

Total works (1Q2021)	£26,270,000
Contingency reduced to 5%	<u>£1,313,500</u>
Total	<b><u>£27,583,500</u></b>

- 1.4 Updated construction costs for 3Q2021 as shown in Core Five's cost plan are £30,540,000. However, appraisal summary uses 5% contingency and the sum we are appraising against is as follows:

Total works (3Q2021)	£28,410,000
Contingency 5%	<u>£1,420,500</u>
Total	<b><u>£29,830,500</u></b>

- 1.5 Uplift in costs therefore calculated to 8.15%
- 1.6 BCIS Tender Price Indices (TPI) are typically used for adjusting estimates and budgets to different dates. All-in-one TPI for 1Q2021 was 328, all-in-one TPI for 3Q2021 was 339, which equates to 3.35% increase. However, the All-in-one TPI for 4Q2021 (the date of our review) is 345, which equates to 5.18% increase since 1Q2021.
- 1.7 With use of BCIS All-in-one TPI the updated construction costs are as follows:

Total works (updated to 4Q2021)	£27,631,555
Contingency 5%	<u>£1,381,578</u>
Total	<b><u>£29,013,133</u></b>

**2.0 CONCLUSION:**

- 2.1 We conclude the updated construction costs at £29,830,500 are £817,367 higher than expectation.
- 2.2 There has been increase in construction costs influenced by shortage of materials and labour, however the current increase in BCIS All-in one Tender Price Indices (TPI) is 5.18% since 1Q2021, which is lower than proposed 8.15%

**GRAND UNION HOUSE  
REVIEW OF CONSTRUCTION COSTS IN UPDATED  
VIABILITY REPORT 24/09/21**



Geoffrey Barnett  
Associates



BCIS All-in TPI #101

Base date: 1985 mean = 100 | Updated: 24-Sep-2021 | #101

Date	Index	Equivalent sample	Percentage change		
			On year	On quarter	On month
4Q 2019	333	56	0.9%	-0.6%	
1Q 2020	335	Provisional	1.2%	0.6%	
2Q 2020	335	Provisional	0.0%	0.0%	
3Q 2020	330	Provisional	-1.5%	-1.5%	
4Q 2020	328	Provisional	-1.5%	-0.6%	
1Q 2021	328	Provisional	-2.1%	0.0%	
2Q 2021	331	Provisional	-1.2%	0.9%	
3Q 2021	339	Provisional	2.7%	2.4%	
4Q 2021	345	Forecast	5.2%	1.8%	
1Q 2022	351	Forecast	7.0%	1.7%	
2Q 2022	354	Forecast	6.9%	0.9%	
3Q 2022	354	Forecast	4.4%	0.0%	
4Q 2022	353	Forecast	2.3%	-0.3%	
1Q 2023	353	Forecast	0.6%	0.0%	
2Q 2023	357	Forecast	0.8%	1.1%	
3Q 2023	360	Forecast	1.7%	0.8%	
4Q 2023	365	Forecast	3.4%	1.4%	
1Q 2024	368	Forecast	4.2%	0.8%	
2Q 2024	371	Forecast	3.9%	0.8%	
3Q 2024	374	Forecast	3.9%	0.8%	
4Q 2024	379	Forecast	3.8%	1.3%	
1Q 2025	384	Forecast	4.3%	1.3%	
2Q 2025	386	Forecast	4.0%	0.5%	
3Q 2025	389	Forecast	4.0%	0.8%	
4Q 2025	395	Forecast	4.2%	1.5%	
1Q 2026	399	Forecast	3.9%	1.0%	
2Q 2026	401	Forecast	3.9%	0.5%	

## **APPENDIX 2 – Design Review Panel Report**

**London Borough of Camden Design Review Panel**

**Report of Chair's Review Meeting: Grand Union House**

Friday 29 January 2021  
Conference call

**Panel**

Catherine Burd (chair)  
Barbara Kaucky

**Attendees**

Kevin Fisher	London Borough of Camden
Richard Limbrick	London Borough of Camden
Sofie Fieldsend	London Borough of Camden
Victoria Hinton	London Borough of Camden
Rose Todd	London Borough of Camden
Angela McIntyre	Frame Projects
Kiki Ageridou	Frame Projects

**Apologies / report copied to**

Bethany Cullen	London Borough of Camden
Richard Wilson	London Borough of Camden
Edward Jarvis	London Borough of Camden
Deborah Denner	Frame Projects

**Confidentiality**

This is a pre-application review, and therefore confidential. As a public organisation Camden Council is subject to the Freedom of Information Act (FOI), and in the case of an FOI request may be obliged to release project information submitted for review.



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## 1. Project name and site address

Grand Union House, 16-20 Kentish Town Road Camden, London

## 2. Presenting team

James Sellar	Sellar Property Group
Jonathan Cohen	Sellar Property Group
Tom Emerson	6A Architects
John Ross	6A Architects
Irene Djao-Rakitiné	Djao-Rakitiné
Nick Bridges	Bridges Associates
Jonathan Waugh	RPS Group

## 3. Planning authority briefing

Grand Union House is located on the eastern side of Kentish Town Road, with a Grade II listed Sainsbury's supermarket behind the site, and access to its servicing yard to the north. The Grade II listed St Michael's Church, a welfare centre and a block of flats are to the south.

The proposed scheme comprises four storeys in height and will partially demolish the existing Grand Union House, reusing the structure and infilling the undercroft to provide office accommodation. The existing undercroft is partly used as a private car park and is gated; it also provides a vehicle exit for Sainsbury's supermarket servicing vehicles to the rear and a pedestrian route which leads into Sainsbury's and onto Camden Road. Sainsbury's servicing will be accommodated within their existing site.

The majority of the site is located within the Regent's Canal Conservation Area. In 2019 the neighbouring Grimshaw properties including Grand Union Walk and the Sainsbury's supermarket were designated as Grade II listed. Officers consider the site to be of neutral contribution. The site is also located within the designated Camden Town, town centre.

A full planning application reference 2018/6092/P was submitted in 2018 although this was withdrawn. The application, with a different design and design team, was presented to the panel for a full review in October 2018.

Officers would welcome the panel's views on the overall mass and height of the development, and the detailed design of the building in terms of proportions and materials. They also welcome the panel's comments on routes through and around the site, any impact on the character and appearance of the Conservation Area, long views of the proposal, and the scheme's contribution to the street scene at ground floor.



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## 4. Design Review Panel's views

### *Summary*

The panel applauds the ambitious work undertaken by the design team to create a new type of workspace for Camden, placing wellness, sustainability, landscape, ecology and biodiversity at its heart. Thoughtful refinement of the design following the appointment of a new design team is supported, and the panel finds significant improvements have been made to the proposed landscape and public realm. The design team are now encouraged to consider any further physical and visual and connections the scheme can create to improve this part of Camden. In particular, the panel suggests there may be potential to open up the route between St Michael's Church and the Leyland DIY store. The quantity and quality of street and internal planting is commended, and the panel would like to see careful and realistic consideration of how this will be maintained throughout the building lifespan. Further activation of the ground floor should be explored, with the panel encouraging greater permeability, especially along the building's northern leg. The panel urges the applicant team consider its public offer and explore the viability of creating community space within the ground floor. Amendments to the roofscape and façade design are welcomed. Careful testing of the glazed facade's promised transparency and potential combination of glass, open and mesh panels is vital. The residential element requires further work so that its ambition aligns with the rest of the proposals. It appears compressed, and the possibility of greater generosity in its layout and height should be tested so its architectural language feels coherent with the rest of the scheme. These points are expanded below.

### *Public realm and routes*

- The panel welcomes the significant improvements made to the public realm and landscape.
- The relocation of car parking from ground to basement level will significantly improve the scheme's ground plane.
- The panel notes the dead-end route between St Michael's Church and the Leyland DIY store and urges the design team to explore if the proposals can improve the quality and connectivity here. Connecting this route to the back of the site would improve this part of Camden Road, and provide an alternative route to the bike store for building occupants.
- The panel would like to see the exploration of further visual connections from Camden Road to help improve this part of Camden.
- The panel notes that use class E covers a wide range of commercial activities, with different servicing requirements, and would like to ensure that the specific uses proposed at planning stage are secured and delivered.
- The panel questions if the ground floor can have a more generous public offer, with more physical permeability for the public along Kentish Town Road.



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- The panel have mixed views about the omission of the small scale retail units proposed at the previous review, and the rhythm and value they added to the streetscape.
- While the café and retail spaces on the southern leg of the building are welcomed, a publicly accessible space in the northern leg of the building would reduce the singularity of this element along Kentish Town Road.
- Based on the commercial uplift of the scheme, there may be an incentive to provide a ground floor community space with real public value along Kentish Town Road. The applicant team should explore the viability of this with Camden officers.
- Lighting will be integral to the quality of the public realm and the façade appearance.

## *Planting*

- The ambitious quantity and quality of street planting, and its contribution to the biodiversity and sustainability strategy is to be commended.
- However, the panel has concerns about the ongoing cost of maintenance and would like to see mechanisms for this embedded into the scheme now so this can be secured as part of any planning permission.

## *Roofscape*

- The panel welcomes changes to the form of the roofscape, which in its view improve the overall appearance of the building.

## *Façade appearance*

- The panel is encouraged by the emerging façade appearance. It encourages the design team to continue to interrogate the design to ensure the ambition can be delivered in reality.
- As drawn the façade has a very transparent quality. The panel highlights the importance of this transparency and encourages the design team to ensure this can be delivered. This may result in using more than one type of glass across the façade.
- The panel encourage experimentation with different types of glazed, solid and mesh panels, in conjunction with how the building is lit internally and externally. It suggests there is scope for difference in levels of transparency across the facade.



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- The panel has varying views on the glazed screen to the contemplation garden. Some of the panel feel the screen would work better as a pergola, another option could be to make openings in the screen.
- The design team should test how openings to the screen would affect its appearance in the street and townscape. The level of transparency of glazing here should be carefully tested with the panel encouraging as much transparency as possible.
- Consideration to be given to how the glass is cleaned, and any fixed guarding or safety equipment incorporated.
- The panel encourages the design team to explore incorporating off-the-shelf, readymade industrial elements in the spirit of the Grimshaw original.

### *Residential building*

- In the panel's view the plan and elevations of the residential building are compressed and underwhelming. It would like to see more ambition here, in line with the rest of the proposals.
- The design team should look at Grimshaw's Grand Union Canal Walk Housing, as an alternative to standard residential layouts and sizes.
- Homes should be designed with the same innovative approach towards health and wellbeing taken by the rest of the scheme, especially in a post Covid-19 world.
- The design team should explore if the residential footprint can be expanded, or if proposals can become one storey taller to allow them to feel less compressed.
- While there are considerations about rights to light and daylight to existing properties, the panel considers that, in townscape terms, there is no requirement for the residential building to step down in height.
- The relaxation of both the layout in plan and the height will help the residential building feel more coherent with the architectural language of the rest of the scheme.
- The panel suggests there is the potential for a luscious roof garden above the residential building for its residents to enjoy, similar to the contemplation garden proposed on top of the office building.



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## *Entrances / Cycle storage*

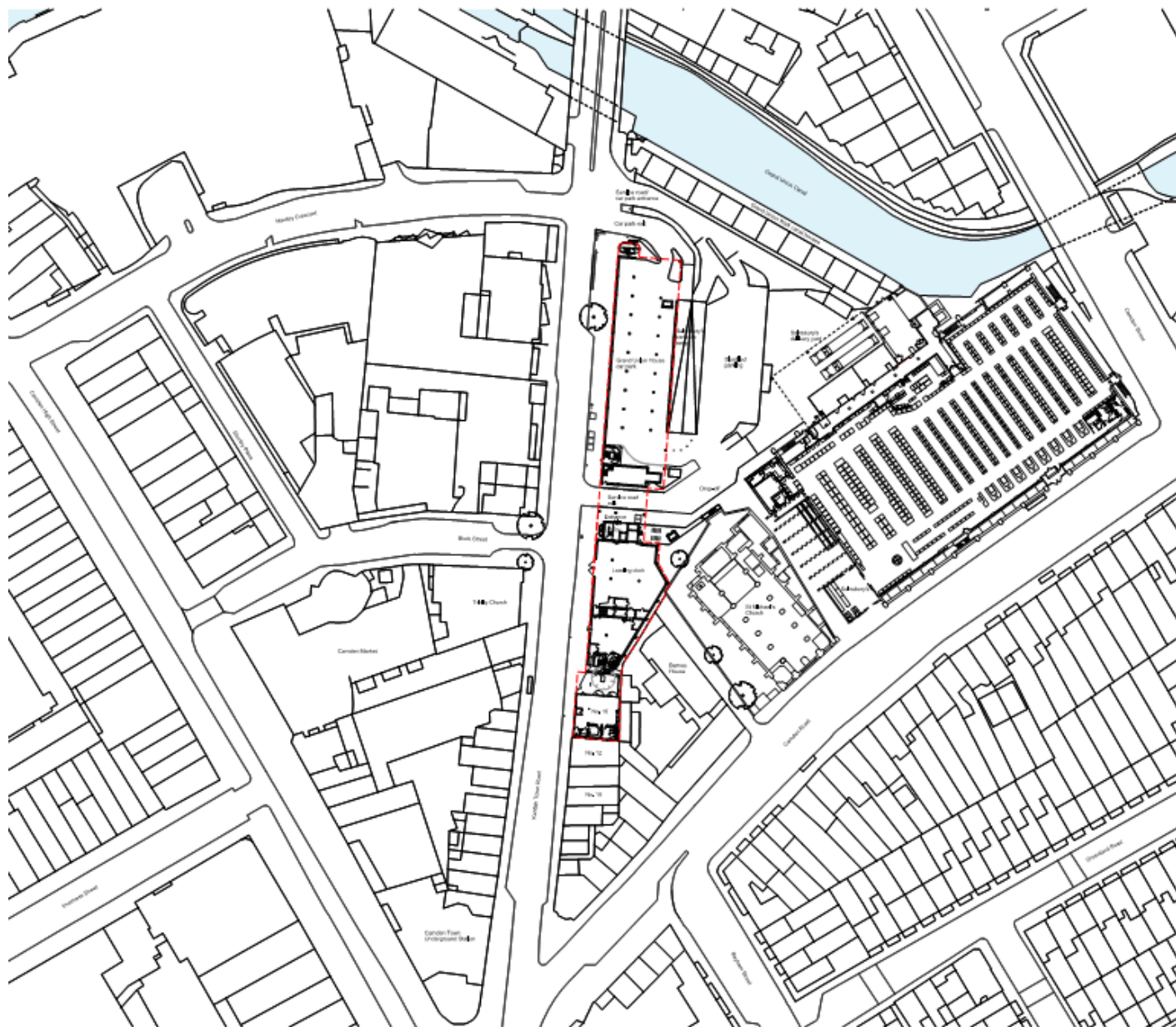
- The panel is encouraged the layout has been tested for different types/ sizes of potential office occupants. It encourages further review of the potential routes into the building for the different scenarios, and e.g. if users are arriving by bike.
- It cautions against cycle storage opening directly to unmonitored external spaces, as this could result in easy access for bike thieves.

## *Next Steps*

The panel has confidence that the design team will be able to refine the scheme in response to the comments above, in consultation with planning officers.

It would support the use of planning conditions to ensure the current design team are retained to follow through the quality of design to construction stage.











Existing street facade

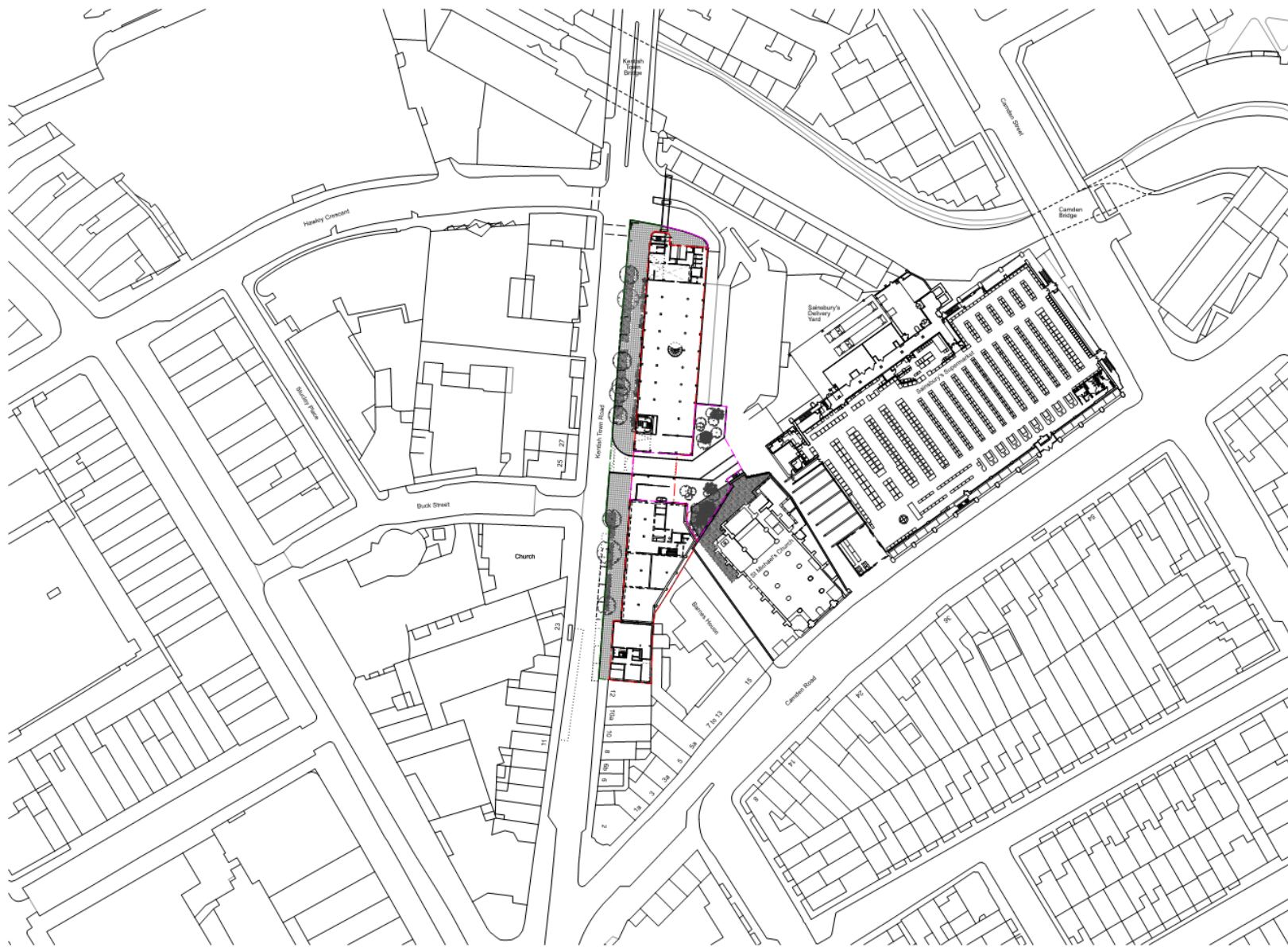


Existing rear facade

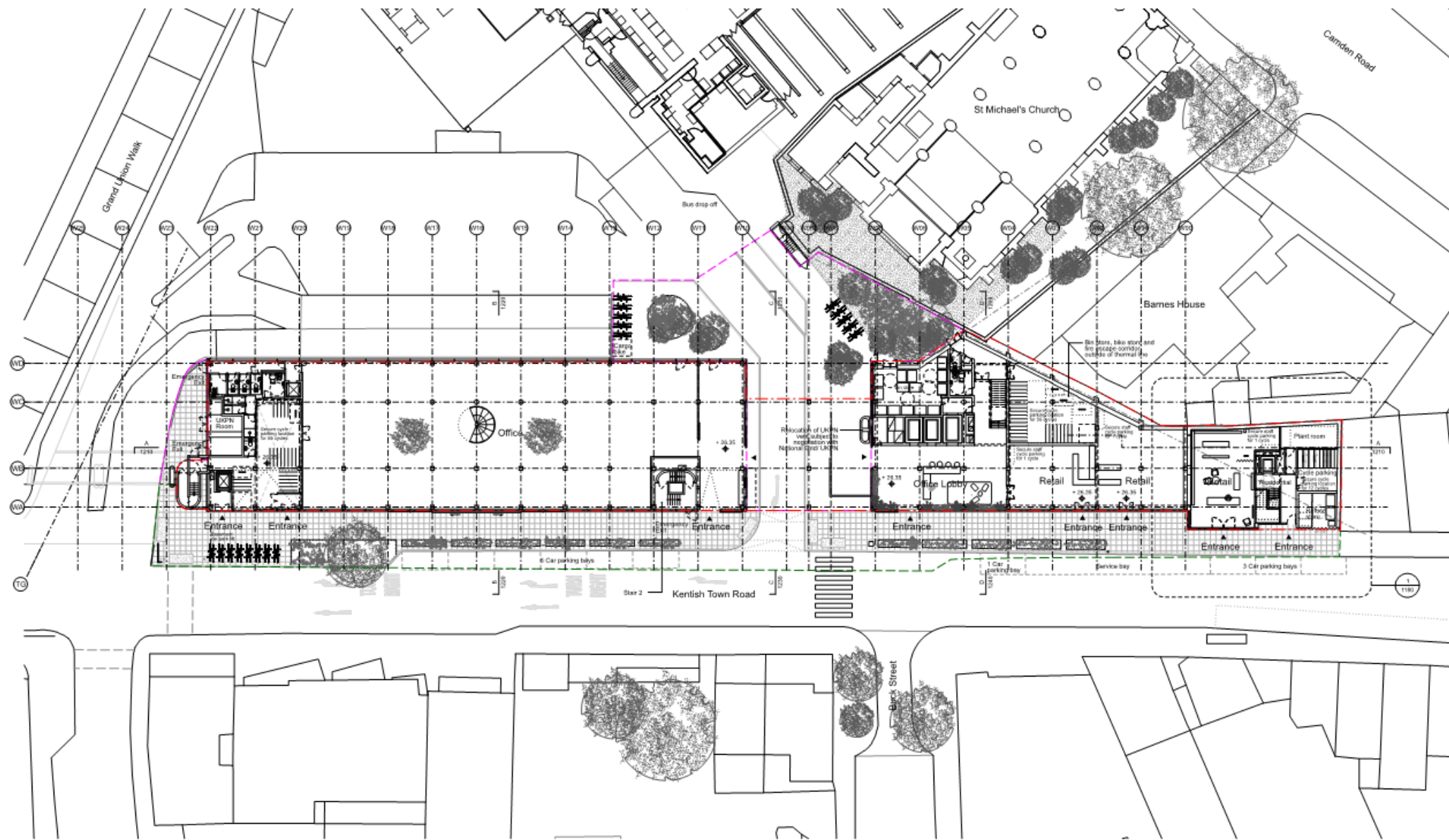


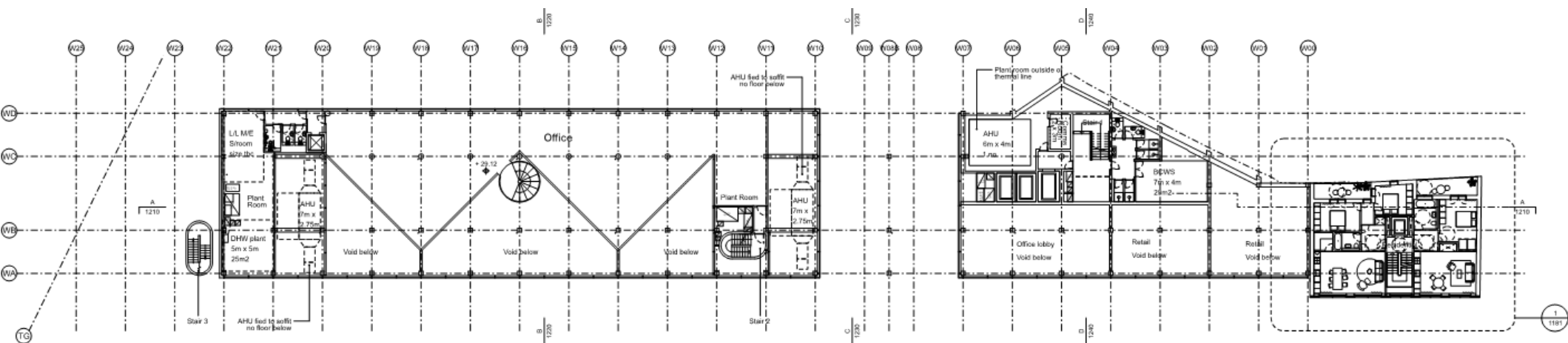


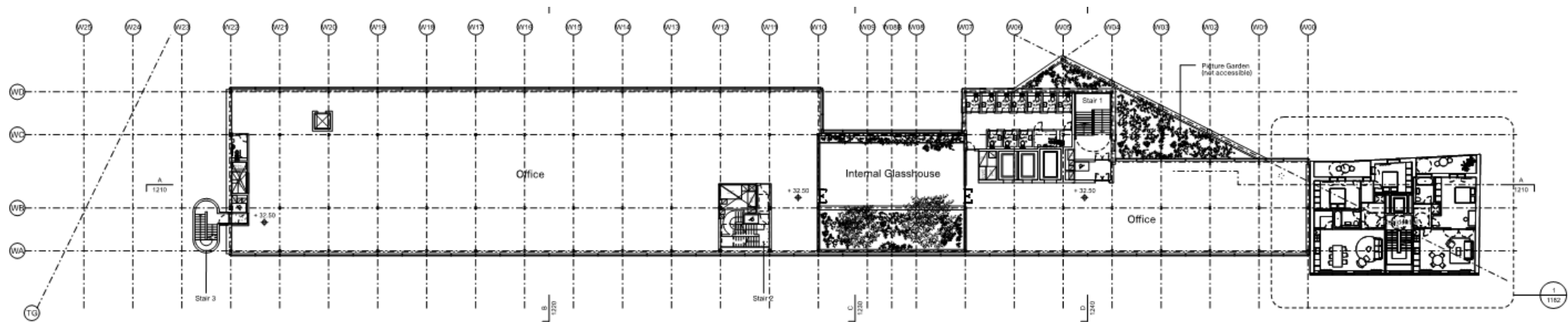


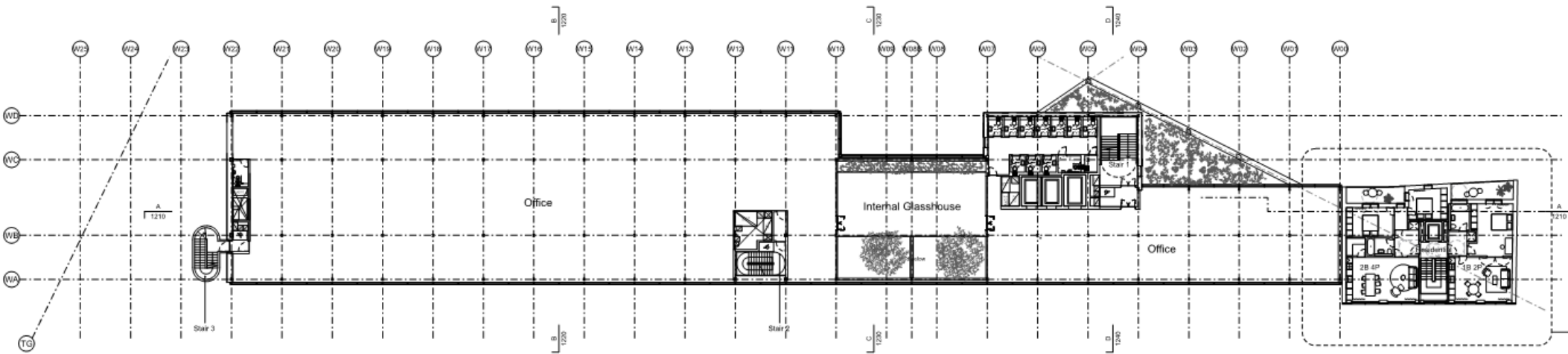


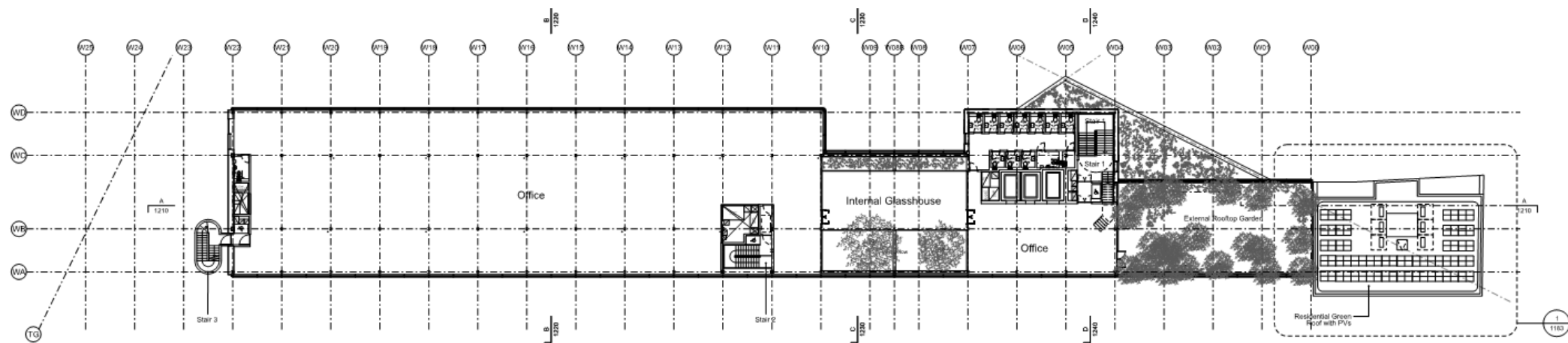


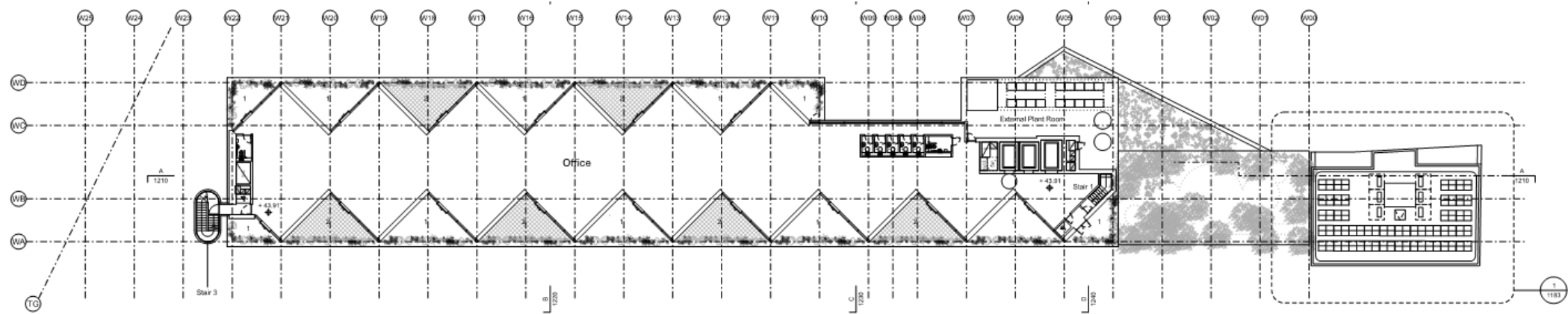




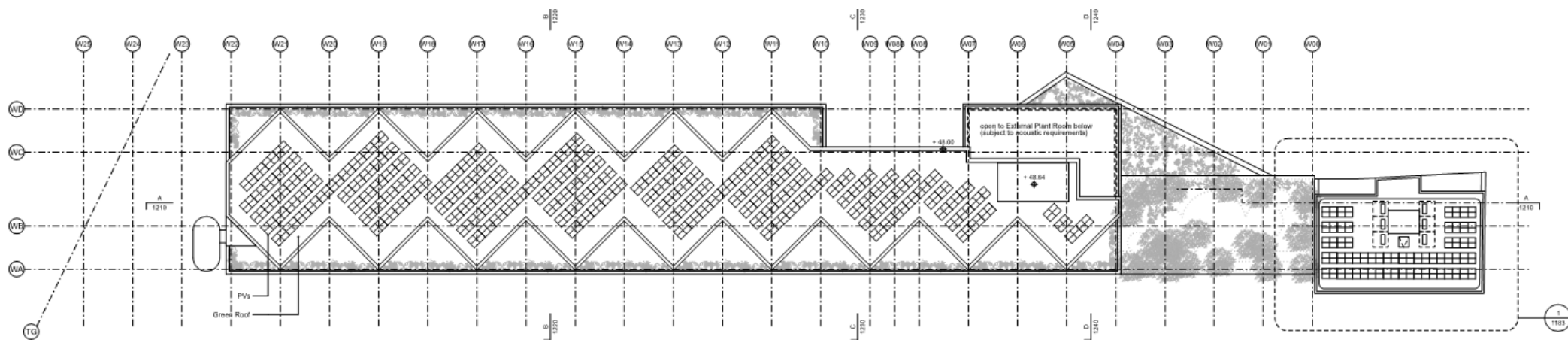


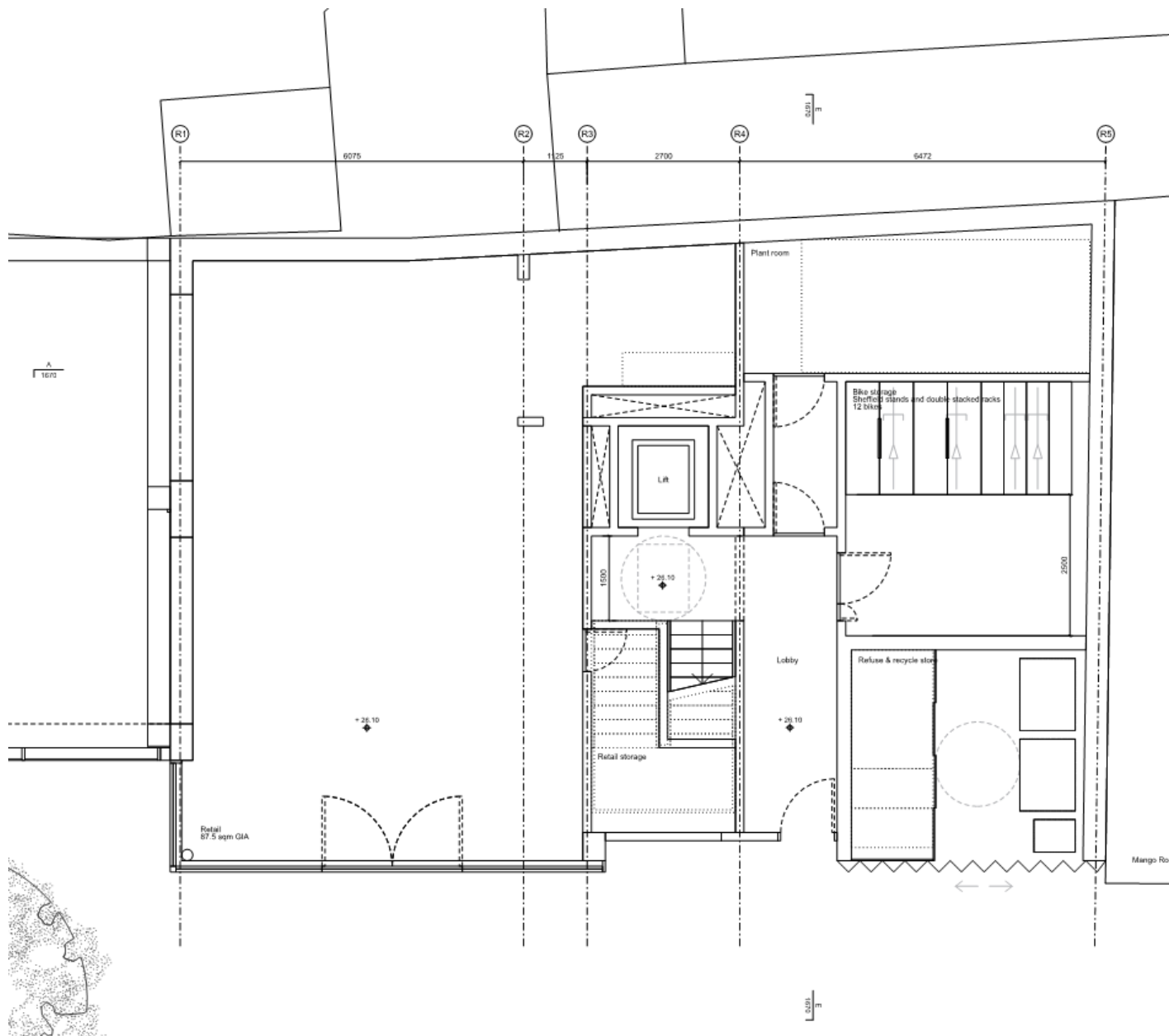


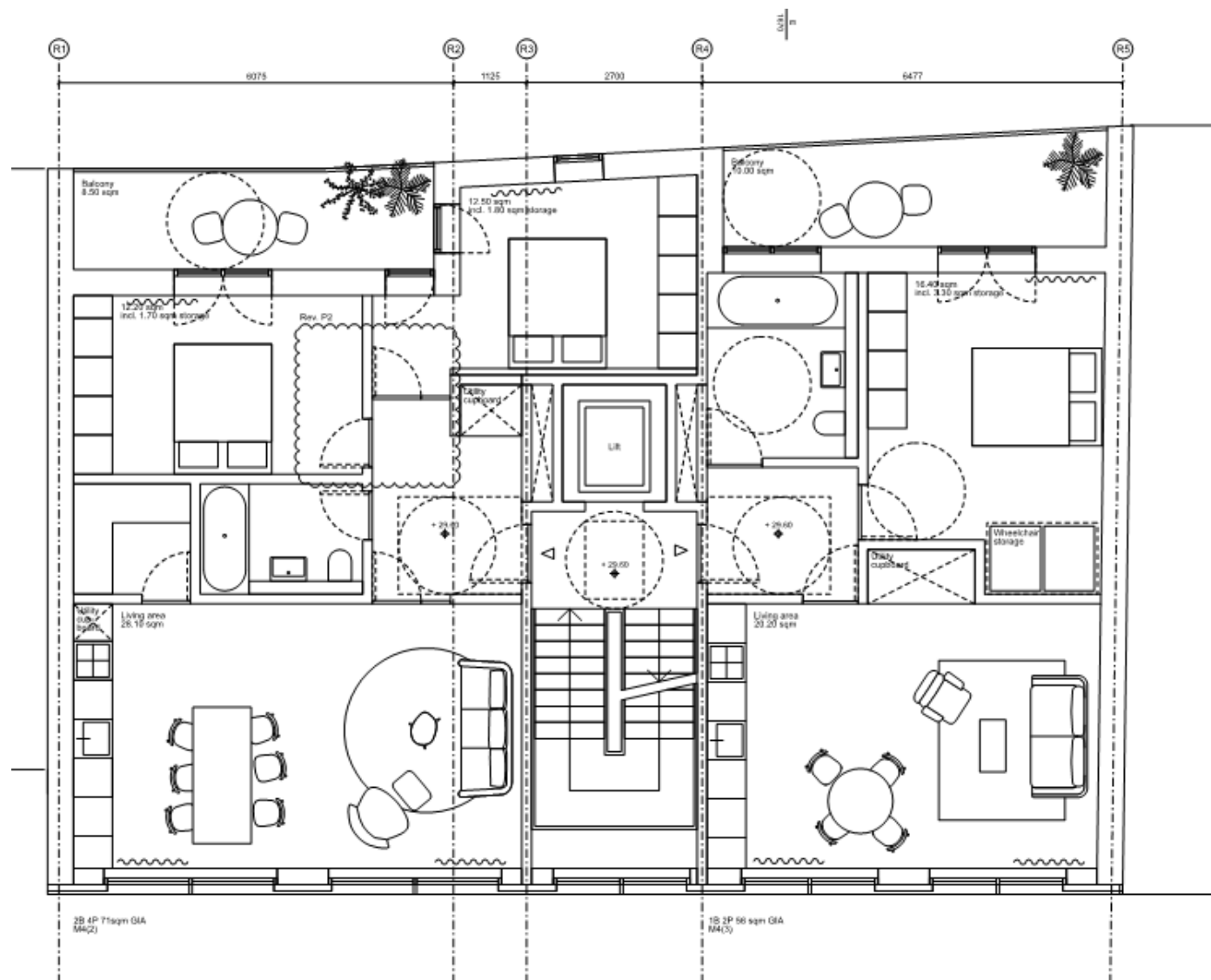




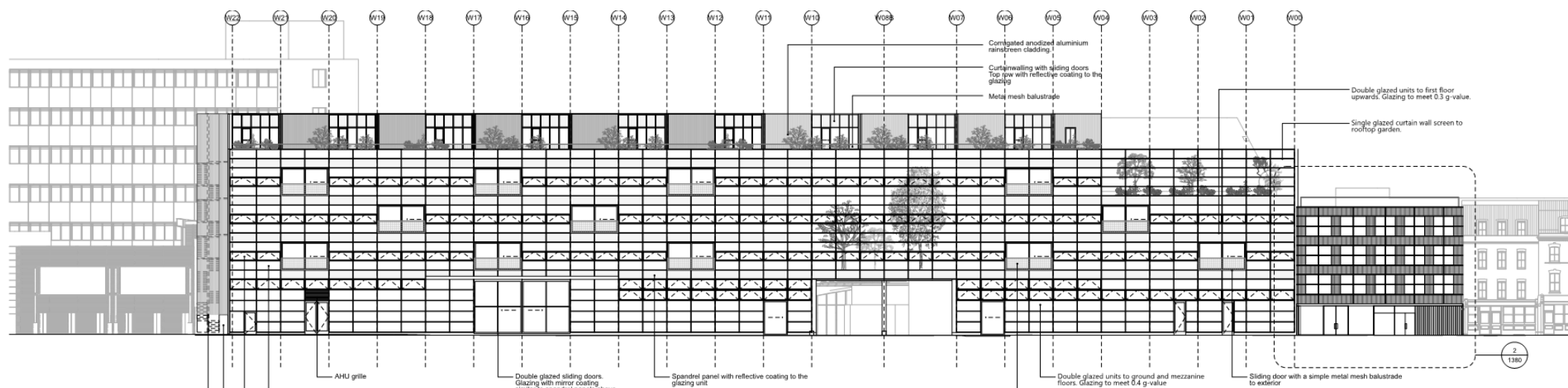


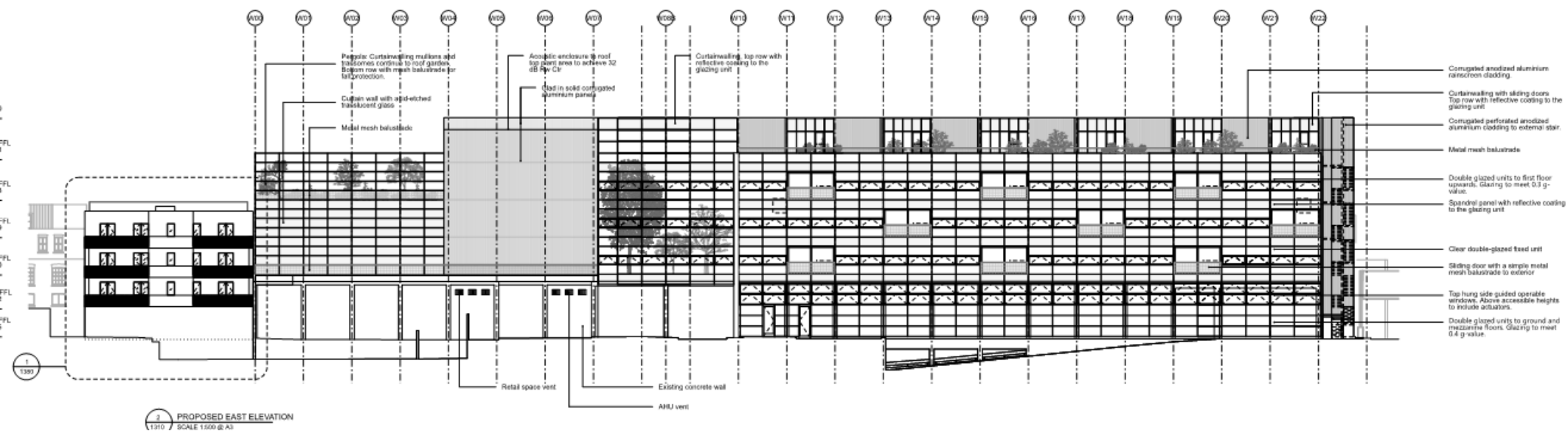


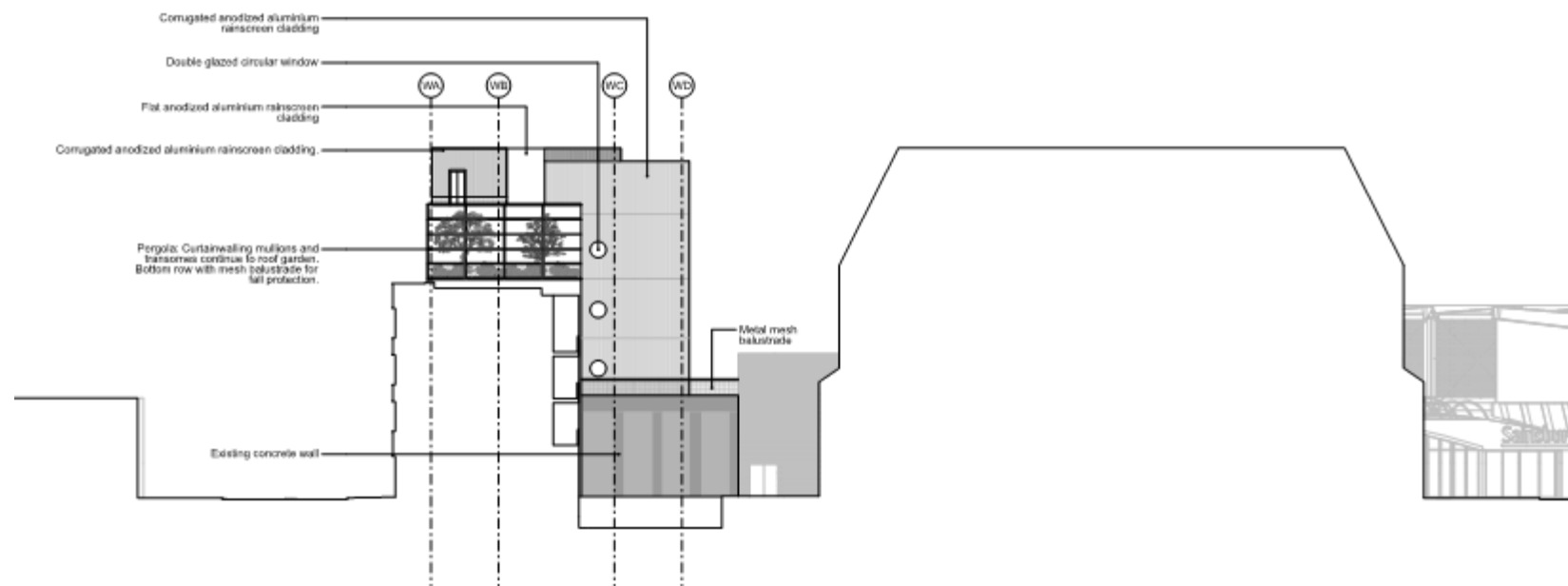


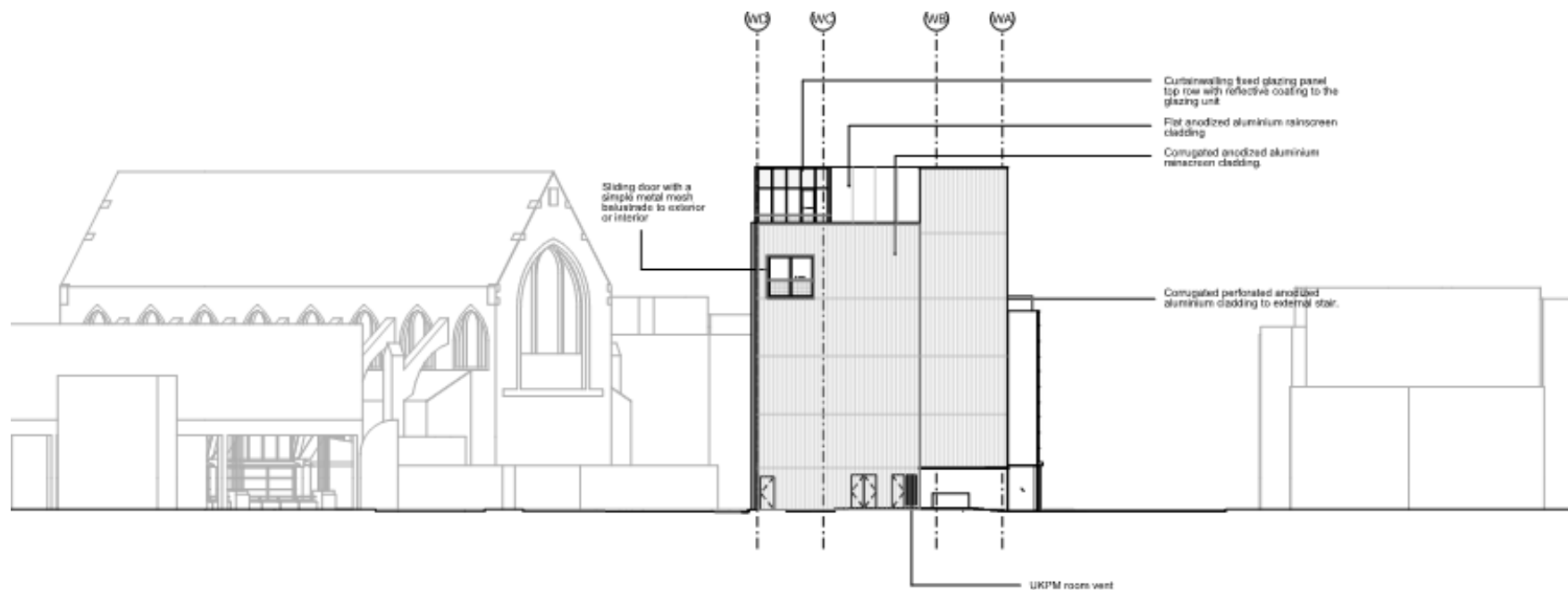








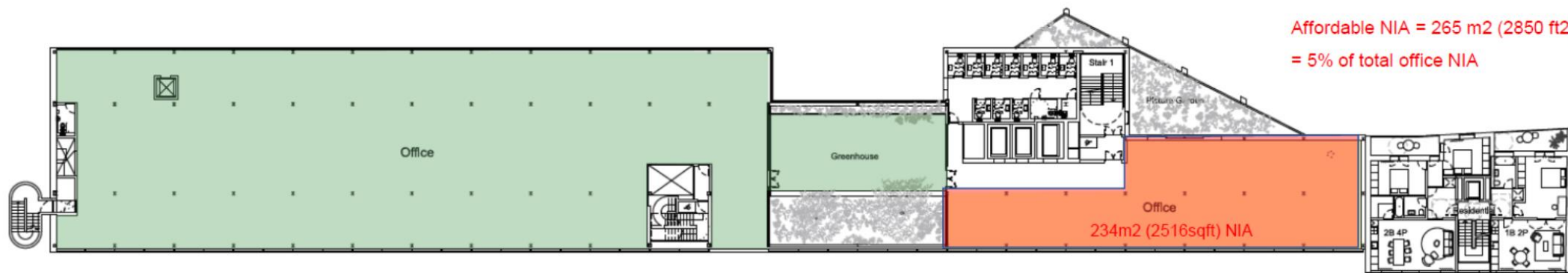




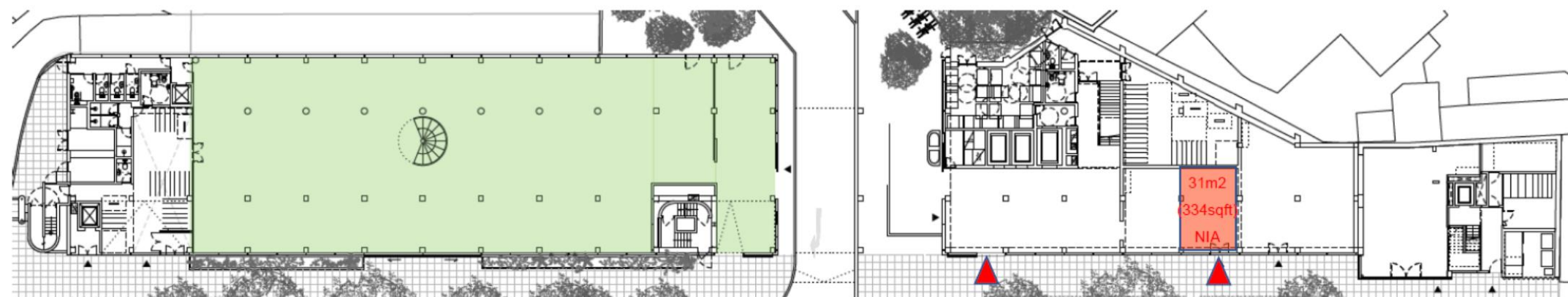


333sqm  
(GIA)

Affordable NIA = 265 m<sup>2</sup> (2850 ft<sup>2</sup>)  
= 5% of total office NIA



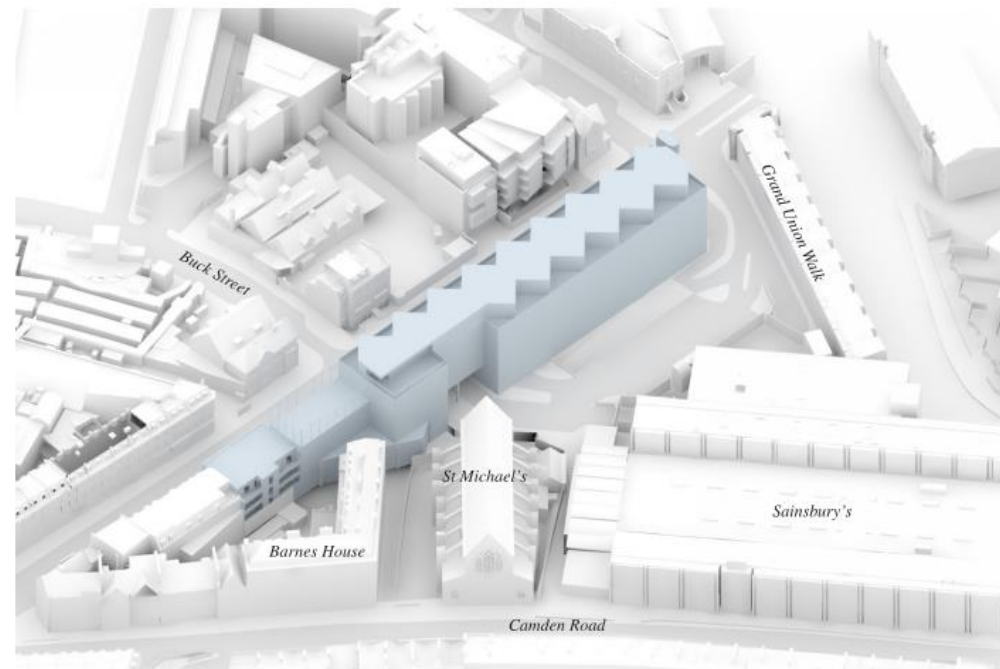
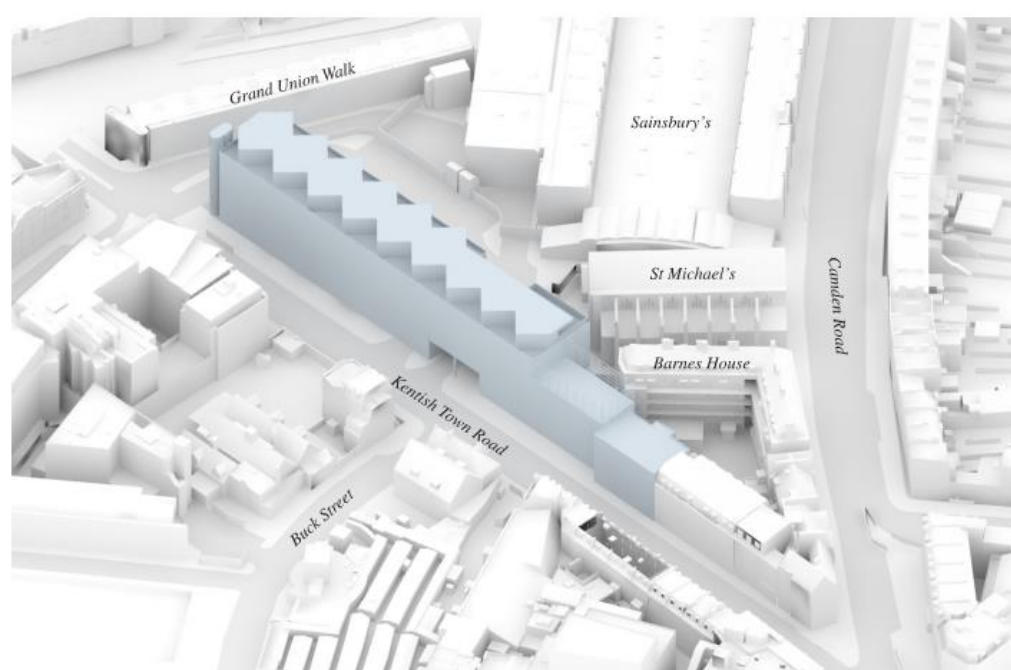
First floor plan 01



Ground floor plan 00

Option B:  
Shared entrance,  
lobby & core with  
market tenants

Option A:  
Dedicated  
entrance,  
lobby & core



*The massing of the proposed Grand Union House.*

