Address:	100 and 100a Chalk Farm Road London, NW1 8EH			
Application Number(s):	2024/0479/P 2024/0539/L <b>Officer:</b> Kristina Smith		1/2	
Ward:	Camden Town with Primrose Hill			
Date Received:	06/02/2024			
Proposals:	Planning permission: Demolition of existing buildings and redevelopment of the site to provide two new buildings of between 6-12 storeys: one containing affordable homes (Class C3) and one (with three cylindrical volumes) containing purpose-built student accommodation with associated amenity and ancillary space (Sui Generis), a ground floor commercial space (Class E) together with public realm, access, plant installation, and other associated works.  Listed Building consent: Removal of existing steel beams in party wall with adjoining Roundhouse and works of repair and making good to brickwork.			

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

### Planning Permission

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Existing Drawings:
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356_P10.001 A; 356_P10.002 A; 356_P10.050 A; 356_P10.099 A; 356_P10.100 A;
356_P10.101 A; 356_P10.102 A; 356_P10.103 A; 356_P10.104 A; 356_P10.106 A;
356_P10.200 A; 356_P10.201 A; 356_P10.202 A; 356_P10.203 A; 356_P10.204 A;
356 P10.205 A; 356 P10.206 A
Demolition Drawings:
356_P10.250 A; 356_P10.299 A; 356_P10.300 A; 356_P10.301 A; 356_P10.302 A;
356_P10.303 A; 356_P10.304 A; 356_P10.305 A; 356_P10.400 A; 356_P10.401 A;
356_P10.402 A; 356_P10.403 A; 356_P10.404 A; 356_P10.500 A; 356_P10.501 A
Proposed Drawings:
356_P20.129 C; 356_P20.130 C; 356_P20.131 C; 356_P20.132 C; 356_P20.133 C;
356_P20.134 C; 356_P20.135 C; 356_P20.136 C; 356_P20.137 C; 356_P20.138 C;
356_P20.139 C; 356_P20.140 C; 356_P20.142 C; 356_P20.143 C; 356_P30.120 C;
356 P30.121 C; 356 P30.122 C; 356 P30.123 C; 356 P40.110 B; 356 P40.111 B;
356_P40.112 B; 356_P40.113 B; 356_P20.160 I; 356_P20.161 I; 356_P20.162 I; 356_P20.164
I; 356_P20.167I; 356_P20.169 I; 356_P20.170 I; 356_P20.171I; 356_P20.172 I; 356_P30.130
E; 356_P30.131 E; 356_P30.132 E; 356_P30.133 E; 356_P40.120 C; 356_P40.121 D;
356_P40.200A; 356_P40.201A; 356_P40.202 A; 356_P50.001 B; 356_P50.002 B;
356 P50.003 B; 356 P50.00 B; 356 P50.005 B
```

### Documents:

Arboricultural Impact Assessment prepared by Tim Moya Associates ref. 220952-PD-11a (dated January 2024); Affordable Housing Statement prepared by Gerald Eve, dated February 2024; Air Quality Assessment prepared by Air Quality Consultants, ref. J10/14846A/102/F4, dated July 2024; Desk Based Archaeology Assessment Rev 03, prepared by Mola, dated January 2024; Basement Impact Assessment, prepared by Pell Frischmann ref.f106885-PF-

ZZ-XX-RP-C-0005 Rev P02, dated January 2024; Biodiversity Impact Assessment prepared by Ecology by Design ref. EBD02653 Rev 01, dated January 2024; Construction Management Plan prepared by Regal ref. 1130 Feb 2024 - Rev 2, dated February 2024; Circular Economy Statement, prepared by Whitecode, ref 11494-WCL-ZZ-ZZ-RP-Y-0005, dated Rev 04July 2024; Daylight and Sunlight Report prepared by Consil, dated January 2024; Daylight and Sunlight Addendum Letter prepared by Consil. Dated May 2024; Design and Access Statement prepared by DSDHA, dated February 2024 Design and Access Statement Addendum prepared by DSDHA, dated June 2024; Delivery and Servicing Plan prepared by Iceni, dated January 2024; Ecological Impact Assessment prepared by Ecology by Design, dated February 2024; Energy Statement prepared by Whitecode, ref. 11494-WCL-ZZ-ZZ-RP-SS-0001 Rev P03, dated August 2024; Fire Strategy and Gateway 1 Form prepared by Ashton Fire ref. AF3230 Rev 02, dated June 2024; Flood Risk Assessment prepared by Pell Frischmann ref.106885-PEF-ZZ-XX-RP-YE-000010 Rev P04, dated April 2024; Framework Travel Plan prepared by Iceni, dated January 2024: Health Impact Assessment prepared by Volterra, dated January 2024; Heritage Engineering Report prepared by Pell Frischmann ref.106885-PF-ZZ-XX-RP-S-0006 Rev 03, dated January 2024; Heritage, Townscape, Visual Statement (HTVS) prepared by Turley, dated February 2024; Heritage, Townscape, Visual Statement (HTVS) Addendum Note prepared by Turley, dated May 2024; Land Contamination Desk Study, prepared by Pell Frischmann ref. 106885-PEF-XX-XX-RP-GG-600001 P02, dated February 2024; Noise and Vibration Report, prepared by Sandy Brown ref. 22483-R03-Rev C, dated February 2024; Overheating Assessment prepared by Whitecode ref. 11494-WCL-ZZ-ZZ-RP-SS-0003 Rev P01, dated May 2024; Planning Statement prepared by Gerald Eve, dated February 2024; Planning Addendum Covering Letter prepared by Gerald Eve, dated May 2024; Retention and Retrofit Report prepared by DSDHA, dated February 2024; Regeneration Statement prepared by Volterra, dated January 2024; Solar Glare Report prepared by Consil, dated January 2024; Structural Engineering Report prepared by Pell Frischmann ref. 106885-PF-ZZ-XX-RP-S-0005 Rev 03. dated May 2024: Student Housing Management Plan prepared by CRM, dated January 2024; Sustainable Drainage Report prepared by Pell Frischmann ref. 106885-PEF-ZZ-XX-RP-CD-000001 Rev P04, dated April 2024; Sustainability Statement (and BREEAM Pre-Assessment) prepared by Whitecode ref.11494-WCL-ZZ-ZZ-RP-Y-1-002 Rev 01, dated May 2024; Transport Assessment prepared by Iceni, dated February 2024; Transportation Technical Note prepared by Iceni, dated May 2024; Wind Microclimate Assessment prepared by GIA ref. 19066 Rev 02, dated May 2024; Whole Life Carbon Assessment prepared by Whitecode ref. 11494-WCL-ZZ-ZZ-RP-Y-1-004 Rev 1, dated May 2024

### Listed Building Consent

106885-PEF-ZZ-ZZ-SK-S-00801; 106885-PEF-ZZ-ZZ-SK-S-00802; 106885-PEF-ZZ-ZZ-SK-S-00803; 106885-PEF-ZZ-ZZ-SK-S-00804; 106885-PEF-ZZ-ZZ-SK-S-00805; 106885-PEF-ZZ-ZZ-SK-S-00806; 106885-PEF-ZZ-ZZ-SK-S-00807; 106885-PEF-ZZ-ZZ-SK-S-00808 106885-PEF-ZZ-ZZ-SK-S-00809; 106885-PEF-ZZ-ZZ-SK-S-00810; Heritage Engineering Report, prepared by Pell Frishman (dated January 2024)

### **RECOMMENDATION SUMMARY:**

- A) Grant conditional planning permission subject to a s106 agreement following:
  - (i) Referral to Mayor of London for his direction:
  - (ii) Finalisation of detailed wording for conditions following consultation with the Mayor: and
  - (iii) Completion of Section 106 Agreement.
- B) Grant conditional listed building consent.

Applicant:	Agent:
Regal London Ltd	Gerald Eve

# **ANALYSIS INFORMATION**

Land use floorspaces						
Use Class	Description	Existing GIA (sqm)	Proposed GIA (sqm)	Difference GIA (sqm)		
Sui Generis	Student accommodation with ancillary facilities	0	8,858 (264 units)	+ 8,858		
C3	Dwellings (flats – affordable)	0	3,505 (30 units)	+ 3,505		
Class E	Commercial	3,433	852	- 2,581		
Total	All uses	3,433	13,215	+ 9,782		

Proposed housing mix and tenure						
Tenure	Studio	1 bed	2 bed	3 bed	4 bed	Total
Market	0	0	0	0	0	0
Social-affordable rent	0	3	6	8	0	17
Intermediate rent	0	6	6	1	0	13
Total homes	0	9	12	9	0	30

Parking details			
Car Type	Existing spaces	Proposed spaces	Difference
Car - General	15	0	- 15
Car - Disabled accessible	0	1 (on street)	+1
Cycle Type	Existing spaces	Proposed spaces	Difference
Cycle – residential long stay	0	78	+78
Cycle – student accommodation	0	210	+210
Cycle – commercial long stay	0	6	+6
Cycle – short stay (all uses)	0	30	+30

#### **EXECUTIVE SUMMARY**

- i) The application site is on Chalk Farm Road between the Grade II\* listed Roundhouse and a temporary Morrisson's supermarket (pending redevelopment). It contains a six-storey office building with two smaller buildings to the side and rear. The site has been vacant for a number of years though is currently tenanted as artists' studios on a meanwhile use basis. The site is in the Regents Canal Conservation Area and the existing buildings make a neutral contribution to its character and appearance. The site is also located in Camden Town Centre, close to Chalk Farm Road station and various bus stops with a PTAL rating of 6a (Excellent).
- ii) The planning application is for the demolition of the existing buildings and structures on site and the construction of two new buildings. Building 1 constitutes three cylindrical towers and would provide 264 units of Purpose-Built Student Accommodation (PBSA) with two commercial units at ground floor and basement. Building 2 would provide 30 self-contained homes with 17 for social affordable rent (57%) and 13 (43%) for intermediate rent.
- iii) Self-contained housing is the priority land use of the Local Plan and significant weight is attached to its provision. There is also an identified need for student accommodation and the London Plan encourages Boroughs to direct its development towards areas well-connected to transport and local services. PBSA meets a housing need and helps relieve pressure on self-contained housing. A proportion (24 rooms) of the PBSA would be affordable which, together with the 30 affordable self-contained units, would meet the 35% affordable housing requirement of the Mayor's Fast Track route.
- iv) The proposal includes the demolition of the solid wall that abuts the pavement which would make way for new public realm and landscaping. This would improve the street environment as well as providing opportunities for urban greening and drainage.
- v) An associated listed building consent is for the removal of steel beams between the existing building and the Roundhouse, together with works of repair.
- vi) The scheme is an innovative and high-quality design that has been informed by its sensitive heritage context. The form is designed to complement that of the Roundhouse, creating softer shapes that mitigate the impact of the additional height and massing on the streetscene and the setting of the Roundhouse. The massing has been carefully arranged with the taller buildings placed away from the public highway, although closer to the Roundhouse. The architectural detailing and materiality are intrinsically linked to its heritage context, picking up on features and material palette within the local area.
- vii) The proposal conflicts with policy E2 in terms of the loss of 2,581 sqm of office space. Taking a wider view of the area, an office-led development is being brought forward on the neighbouring site (Petrol Filling Station) and collaboration has taken place between the two landowners (Regal and St. George) to ensure the sites are optimised with well-placed land uses. The existing office space is low quality with no step-free access whilst the proposed commercial units, though a

reduced amount, would provide high quality and accessible spaces. A financial contribution of £139,825 to offset the loss of employment floorspace will be secured and will go towards measures which create or promote employment opportunities for local people.

- viii) The scheme promotes active travel, removing an existing on-site car park and providing a car-free development with a level of cycle parking that exceeds the London Plan standards. A Travel Plan is secured to further promote a modal shift to sustainable transport over the lifetime of the development.
- ix) As well as supporting environmental improvements through sustainable travel, the proposal also exceeds key energy and carbon reduction targets through an energy efficient and sustainable development. Greening and sustainable drainage measures reduce the risk of flooding in the area while supporting biodiversity.
- x) Officers have identified less than substantial harm to the Grade II\* listed Roundhouse and the Regent's Canal Conservation Area. This has been given considerable importance and weight. There are significant public benefits arising from the scheme that outweigh that harm, including significant housing provision 35% of which is affordable. This has been given significant weight. The scheme will also provide heritage benefits, including the removal of an unsympathetic building currently attached to the Roundhouse and the relocation and restoration of a Grade II listed cattle trough currently on the Heritage At Risk register (subject to further consents).
- xi) The scheme promotes active travel principles alongside public realm improvements and will deliver significant employment and training opportunities for local residents during both construction and operational phases.
- xii) The scheme complies with the development plan as a whole and is recommended for approval.

#### **OFFICER REPORT**

#### Reason for referral to committee:

Major development involving the provision of more than 10 new dwellings or more than 1,000 sqm of non-residential floorspace (Clause 3(i)).

# Referral to the Mayor:

The application would provide a building which is over 30m in height and is therefore referable to the Mayor under the Mayor of London Order 2008. The Mayor has the power to direct the local authority to refuse the application or call in the application for determination.

# **Environmental Impact Assessment (EIA) (screened out):**

A screening opinion for the proposal was provided by the Council on 11<sup>th</sup> January 2024 confirming the development did not constitute EIA development under the EIA Regulations 2017. An EIA is therefore not applicable to the development.

#### 1. SITE AND BACKGROUND

# **Designations**

1.1 The following are the most relevant designations or constraints:

Designation	Details	
Town Centre (TC)	Camden Town	
Conservation Area (CA)	Regents Canal	
PTAL (Public transport accessibility)	6a (Excellent)	
Underground development constraints and considerations	- Historically flooded street (Chalk Farm Rd) - Surface water flow and flooding - Potential land contamination - Slope stability - TfL zone of interest (tunnel asset)	

Table 1 - Site designations and constraints

#### Description

The site is 0.28ha and comprises three 1970s commercial buildings situated between a railway line to the south (mainline rail to Euston) and Chalk Farm Road to the north. The largest and most distinctive building is a part two, part six-storey office building which has a solid brick base fronting Chalk Farm Road with upper floors constructed in a combination of blue metal cladding and glazing. Behind this (to its south), is a lower three storey office building. The two are connected by a two-storey building that abuts the Roundhouse to the rear. The two lower buildings are not readily visible from the public realm but can be seen from the railway and in largely private views from Juniper Crescent. The site slopes steeply up from Chalk Farm Road to the

railway boundary with a change in level of approximately 4.5m. Surface level and undercroft car parking are located to the rear, accessed by a vehicle crossover at the northeastern edge of the site.

1.3 The site has been vacated by its former owner and occupant, One Housing Group, and is currently leased to 'Proposition Studios', a charity that supports upcoming local artists and who are occupying the buildings on a temporary rent-free basis.



Figure 1 - The site viewed from the south

The site is in Camden Town Centre along a secondary frontage. To its west, the site neighbours the Grade II\* listed Roundhouse which today functions as a theatre and live music venue. To its east is the Petrol Filling Station (PFS) site (known as such as it previously was in use as a petrol station) currently occupied by a temporary supermarket pending construction of an office-led development (see planning history for more information) as part of the wider Camden Goods Yard development. To the south, beyond the railway, is the Juniper Crescent Estate. Following a favourable resident ballot, there are plans (currently at pre-application stage) to redevelop the site to provide additional housing. To the north of the site is a more fine-grained part of Camden, comprising a mix of commercial uses along the high

street at ground floor level, with residential uses above and on the streets leading off (Belmont Street, Crogsland Road). Slightly further afield to the north-west is Chalk Farm Underground Station.

- The site is in the Regents Canal Conservation Area, and the site is a neutral contributor to its significance. On 22 December 2023, a Certificate of Immunity from Listing was issued confirming that the Secretary of State, on the advice of Historic England, will not add the buildings on site to the statutory list of buildings of special architectural or historic interest. There are several heritage assets close to the site, most notably the aforementioned Grade II\* listed Roundhouse. On the adjacent footway to the site is a Grade II listed cattle drinking trough which is identified as 'at risk' on the Heritage at Risk Register maintained by Historic England. Chalk Farm Underground Station to the northwest is Grade II listed. Further to the east along Chalk Farm Road is the Grade II\* listed Horse Hospital and the Grade II listed Stanley Sidings and Stables. A small part of the eastern corner of the site is within the London View Management Framework ('LVMF') protected vista from Parliament Hill.
- 1.6 The site is highly accessible by public transport. It has a PTAL rating of 6a (on a scale of 0 6b with 6b representing the highest level of connectivity to public transport). The site is within short walking distance of both Chalk Farm and Camden Town Underground stations (0.16 km and 0.8km respectively). Also located to the front of the site is the Roundhouse bus stop which is served by three daytime and three nighttime bus routes.
- 1.7 An Article 4 Direction preventing the change of use of a building from commercial to residential (under Class MA of Part 3 of Schedule 2 of TCPA) without planning permission applies to the site.

### 2. PROPOSAL

- 2.1 The planning application is for demolition of the existing buildings and structures on site (including the solid wall fronting Chalk Farm Road) and the construction of two new buildings, referred to as Building 1 and Building 2.
- 2.2 Building 1 is connected at ground floor level, but above is expressed as three cylindrical volumes of varying scales. It would comprise 852 sqm of commercial (Class E) floor space at ground floor level and 264 student accommodation units (Sui Generis) at upper floors.
- 2.3 Building 2 is in the southeast part of the site and includes 30 affordable homes (Class C3). A shared residents garden with play space would be provided at podium level, accessible to both the permanent housing occupants and students. New landscaped public spaces together with an improved and widened pavement would be created at ground level including a new tiered space with ramped access adjacent to the Roundhouse.

2.4 The development varies in height between 6 and 12 storeys, plus a basement level. The three cylindrical drums of Building 1 have the following heights:

North Drum: 6 storeys / 18m
East Drum: 9 storeys / 27m
West Drum: 12 storeys / 36m

2.5 Building 2 is a rectilinear building of 11 storeys / 33m.



Figure 2 - scheme overview with heights

- 2.6 The student housing comprises a combination of 240 private studio rooms (1b1p) and 24 cluster rooms (1b1p), together with communal ancillary student facilities at ground floor level. A total of 10% of the studio rooms will be wheelchair accessible for disabled students.
- 2.7 The 30 affordable homes include 9 x 1-beds; 12 x 2-beds; and 9 x 3-beds. Seventeen (17) homes (57%) will be for social-affordable rent (Low Cost Rent) and 13 homes (43%) for intermediate rent. There will be 3 wheelchair accessible homes in the social-affordable rent tenure.
- 2.8 The application is linked (via condition) to a requirement to re-locate and restore the listed cattle drinking trough, subject to permission being granted. However, this will come forward under a separate application for listed

building consent and s.278 works given its location outside of the red line boundary on the public highway.

#### Revisions

2.9 The following revisions have been made since the application was submitted:

## Student housing building

- Internal reconfiguration of the basement including location of plant.
- Amendments to the façade of the student accommodation building including to material palette and arrangement and detailed design of windows.
- Reconfiguration of the wheelchair units in the student accommodation block to improve quality of accessible accommodation.

# Affordable housing building

- Increase in number of affordable homes from 24 to 30 as a result of changes below
- Extension of building to meet eastern site boundary line.
- Addition of 'crown' to provide one home at 10th floor level (previously proposed as plant enclosure).
- Extension of the eastern stair core and lift overrun.
- Reconfiguration of floor layouts throughout.
- Ground floor changes to the entrance of the affordable housing building including redesign of balustrades and gates.
- 2.10 The listed building consent application is for the removal of steel beams in the party wall between the existing buildings and the Grade II\* Roundhouse and subsequent works of repair.

### 3. RELEVANT HISTORY

# The site

- 3.1 **2019/5407/P -** Temporary change of use from office (B1a) to a 25-bed cold weather shelter (Sui Generis) for EEA national rough sleepers until 31 March 2020 **Temporary planning permission granted on 25/11/2019**
- 3.2 2013/5403/P Redevelopment of site to create a mixed-use development comprising 57 market flats (13x1beds, 28x2beds and 16x3beds), 6 affordable flats (3x3 bed social rented, 3x1 bed intermediate), new office, retail and restaurant units with associated works to highways and landscaping; following demolition of existing buildings and car park Granted subject to a Section 106 legal agreement on 27/03/2015
- 3.3 **2013/5448/L** Removal of existing steel beams in party wall with adjoining Roundhouse and works of repair and making good to brickwork **Listed Building Consent granted 27/03/2015**

- 3.4 2013/5449/C Demolition of existing buildings. Conservation Area Consent granted 27/03/2015
- 3.5 The above permission and consents for the 2015 redevelopment scheme were never implemented and have since lapsed.
- 3.6 **2013/5105/P** "Change of use of ground to fourth floors from office (Class B1) to residential (Class C3) to provide for 46 units, comprising of 41x1 bedroom units and 5x2 bedroom units" (subject to s106 to secure car-capped development and a construction management plan) **Prior Approval granted on 04/05/2013**
- 3.7 This prior approval was never implemented and has since lapsed. An article 4 direction has since been imposed to remove permitted development rights to allow change of use from offices to residential.

#### The wider area

## 155-157 Regent's Park Road

3.8 **2021/0877/P** - Demolition of existing building and redevelopment to provide a part 4 storey/part 7 storey building, with two basement levels, for a 59 bedroom hotel, with new street level public realm works in front (at junction of Regent's Park Road, Adelaide Road and Haverstock Hill). **Granted subject to a Section 106 legal agreement on 07/12/2021** 

# Charlie Ratchford Centre, Belmont St

3.9 **2020/5063/P** - Redevelopment of site including demolition of existing buildings and erection of a building up to 10 storeys in height to provide self-contained residential flats (Class C3) and associated works. **Granted subject to a Section 106 legal agreement on 05/11/2021** 

### Camden Goods Yard

- 3.10 2017/3847/P "Redevelopment of petrol filling station site to include the erection of a new building of up to six storeys and up to 11,243 sqm GEA floorspace to accommodate a petrol filling station (Sui Generis use), flexible retail/food and drink floorspace (Class A1, A3 uses), Class B1 floorspace and a winter garden; with cycle parking, public space, public toilets and other associated works and highway works; all following demolition of existing petrol filling station. Use of part ground/first floors as a foodstore (Class A1 use) with associated car parking for a temporary period of up to thirty months.
- 3.11 Redevelopment of the main supermarket to include the erection of seven buildings (Blocks A, B, C, D, E1, E2, F) of up to 14 storeys accommodating up to 573 homes (389 market and 184 affordable in up to 60,568 sqm GEA of residential floorspace) together with up to 28,345 sqm GEA non-residential floorspace comprising foodstore (Class A1), flexible retail/food & drink (Class A1/A3), office and workshop (Class B1a and B1c), community centre (Class

- D2), roof level of 'Block B' for food and plant growing/production facility including small scale brewing and distilling (Sui Generis use); with associated ancillary office, storage, education, training, café and restaurant activities; together with new streets and squares; hard and soft landscaping and play space; lifts; public cycle parking and cycle hire facility and other associated works, including removal of existing surface level car parking and retaining walls, road junction alterations; all following demolition of foodstore." Granted subject to a Section 106 legal agreement on 15/06/2018
- 3.12 Various Minor Material Amendments have been consented to the parent permission. The permission has been implemented, construction on the main site is underway and the temporary supermarket has been completed and is operating on PFS site.

## The Roundhouse

- 3.13 **2016/5760/P** "The erection of a new building ranging from two to four storeys in height to accommodate new studios (Class D1) and offices (Class B1) within the service yard and the addition of a sixth storey to the existing 'container' office building for office accommodation (Class B1) together with installation of rail side storage containers and associated works within the service yard area." **Granted subject to a Section 106 legal agreement on 16/08/2018**
- 3.14 This development is now complete.

#### 4. CONSULTATION

4.1 This section shall detail the consultation that took place by both the LPA and the Developer.

### LPA managed consultation

4.2 During the pre-application process, the proposals were presented at a Development Management Forum on 7<sup>th</sup> September 2023 and at a Developer's Briefing on 30<sup>th</sup> January 2024. The scheme was presented at two Design Review Panels (DRP) in August 2023 and January 2024. Further detail of the DRP engagement is provided in the 'Urban Design' section of the report.

#### Statutory consultees and national groups

## Greater London Authority (GLA)

 Land use principles: The student accommodation-led, mixed-use scheme in this accessible town centre location is broadly acceptable in strategic planning terms. However, a nominations agreement is required to meet the requirements of London Plan Policy H15 in addition to an occupancy restriction for students. Officer response: the applicant has agreed to a reasonable endeavours clause to secure a nominations agreement

- Affordable accommodation: GLA officers accept the hybrid approach to affordable accommodation in this instance. 35% affordable accommodation is proposed by floorspace and habitable rooms which should follow the Fast Track Route.
- Urban design and heritage: Tall buildings would not meet the locational requirements set out in Policy D9(B), however provision of tall buildings could be acceptable subject to an assessment against the requirements of Policy D9(C). GLA officers do not raise any specific strategic issues with tall building impacts. The proposal would result in varying degrees of less than substantial harm to the significance of the heritage assets and a final heritage balance will take place at Stage II.

Officer response: This is acknowledged and an assessment of height and impact on heritage assets has been carried out in the 'Urban Design' and 'Heritage' sections of the report.

 Transport: Further discussion is required in relation to future safeguarding for upgrades to Chalk Farm station to ensure that the application accords with Policy T3. Further responses are required in relation to cycle and blue badge parking provision. Other items should be appropriately secured.

Officer response: further discussion around safeguarding has taken place between the Council, the applicant and TfL. A £50k contribution to a feasibility study has been agreed. See 'safeguarding' section within the 'Transport' section of the report.

- Sustainable infrastructure and environment: Further responses are required in relation to the energy strategy, WLC, circular economy and sustainable drainage. Improvements are required to the applicant's Urban Greening Factor score.
  - Officer response: ongoing discussion has taken place between the GLA and the applicant around energy efficiency and sustainability with improvements and further clarifications proposed. An improvement to the UGF is not confirmed but is expected via maximising green roofs (secured by condition).
- **Recommendation:** Whilst the application proposals are supported in principle in strategic planning terms, the aforementioned issues should be addressed to achieve London Plan compliance.

## Transport for London

• **Trip generation** - the proposals are not expected to result in impacts on the strategic transport network that would require mitigation.

- **Healthy streets** an Active Travel Zone assessment has been undertaken and contributions would be supported towards identified improvements such as street lighting and security cameras.
- **Cycle parking -** the proposed quantum of cycle parking is in line with Policy T5, although detail to demonstrate how the long-term cycle parking for the two commercial units will be permanently provided should be provided.

Officer response: all cycle provision including long-term commercial secured by condition

 Car parking - The car free nature of the proposals is welcomed and supported, as is the exemption of future occupants from applying for CPZ permits as part of the S106 agreement. The blue badge provision remains undefined and demonstration of how the requirements of London Plan Policy T6.5 Non-residential disabled persons parking can be met nearby should be provided.

Officer response: a financial contribution of £4,000 is being secured towards an off-site (within 50m) blue badge parking space

 Safeguarding - A long-term opportunity for an upgrade of Chalk Farm station including a relocated Station entrance in the vicinity of the roundhouse has been identified which GLA and TfL officers would like to discuss and progress with the Council. It is possible that future safeguarding might be necessary within the red line boundary.

Officer response: further discussion around safeguarding has taken place between the Council, the applicant and TfL. A £50k contribution to a feasibility study has been agreed. See 'safeguarding' section within the 'Transport' section of the report.

# <u>Historic England – Objection</u>

- The proposals would cause harm to the significance of the Grade II\* listed Roundhouse and Regents Canal Conservation Area through the arrangement (extending deeper into the plot than the existing), height, massing and views of the proposals. The specific impact of the proposals on the silhouette of the Roundhouse approaching from the west and north, from as far away as Haverstock Hill, is likely to be the greatest concern in this aspect of setting.
- The considerable increase in both massing and height proposed would shift the scale and character of the streetscape in which the Roundhouse and the other historic buildings in the conservation area are appreciated.
- The harm would be at the low end of 'less than substantial'. It is recommended that the effect of the proposals on views from within the historic railway yards should be examined, alongside significant views connected with the other historic buildings linked with the Roundhouse

- in the wider area. Design changes should be explored to minimise harm to significance.
- The potential to enhance and restore the Grade II listed cattle trough, allowing it to be removed from the Heritage at Risk register, are supported.

Officer response: Officers agree with HE's overall assessment of less than substantial harm to the Roundhouse and Regent's Canal Conservation Area. Design improvements have been made during the course of the application to ensure that the building is of exceptional quality and mitigate the impact of the height and massing.

### **Thames Water**

 No objection subject to conditions on piling and water capacity (Condition 11).

## London Underground

• No objection subject to condition requiring detailed design and method statements and load calculations (Condition 5).

### **HS2** Limited

 No objection subject to informative advising the applicant that the site lies adjacent to land that may be required to construct and/or operate Phase One of HS2.

### Greater London Archaeological Advisory Service (GLAAS)

 Significant archaeological remains are not expected on site, but ground reduction may reveal remains of Victorian railways structures of interest. No objection subject to condition on further archaeological investigation (Condition 12).

### Local groups and institutions

# Regent's Canal Conservation Area Advisory Committee (CAAC)

No reply to date.

## Primrose Hill Conservation Area Advisory Committee (CAAC)

- Strong objections. Proposals would cause substantial cumulative harm to a major group of heritage assets in Camden including the special significance of the Roundhouse and its context including Conservation Areas of Regent's Canal, Primrose Hill and Eton.
- The special distinction of the Roundhouse's circular plan form would be significantly diminished by the application's circular towers, which crowd the listed structure and diminish the significance of its massing and of its roof form. The towers mock rather than celebrate the robust dignity of

- the Roundhouse itself and diminish the special distinctive quality of the Listed Building in its context.
- Also very substantially harms the setting of the Roundhouse and the associated and related surviving elements of the Goods Yard. The loss of the line of the wall marking the Goods Yard boundary and its replacement with leftover spaces between the rear of the footway destroys the townscape meaning of the wall and disintegrates the Roundhouse from its Goods Yard context.
- The Roundhouse plays a significant role in longer views in the wider areas and is acknowledged as significant in the Primrose Hill Conservation Area Statement. They are contrasted with the views of the Hill itself, green space compared to industrial townscape of the railway yards define the character of the conservation area.
- Contrary to CLP policy D2 that requires development within conservation areas to preserve or enhance.
- It further states that 'The open view at the end of Fitzroy Road (part of Primrose Hill CA) is a characteristic feature that should be preserved by development.'

Officer response to all above: Harm has been identified to the neighbouring Roundhouse and Regent's Canal Conservation Area but to no other designated heritage assets. Please refer to Heritage section of report for full assessment.

• LB Camden's Building Heights Study acknowledges the site as a sensitive environment and very large or tall buildings would be overly dominant, distracting from views, and be out of character. The Study proposes a height limit at 5-9 storeys, as opposed to the proposed heights of 6-12 storeys. Buildings above 8 storeys should be tested against local sensitivities including designated and non-designated heritage assets, LVMF views and local views. PHCAAC agree with professional assessment.

Officer response to above: the proposed development would undoubtedly be more prominent than the existing building. Its impact is softened by the architectural approach of curved forms, the arrangement of height and massing and high-quality contextual detailing and material palette. Please refer to 'Urban Design' and 'Heritage' sections of report for more detailed discussion on the impact on local views.

 Dispute applicant's assessment of public benefits. Affordable housing does not provide adequate public benefit. Expectation of LP and CLP is that affordable homes should constitute 50%. Officer response to above: the application follows the Mayor's Fast Track approach of 35% affordable housing. Please refer to 'Affordable housing' section of report.

 Draft Site Allocation has an indicative capacity of 100 homes for this site suggesting a minimum of 50 additional affordable homes. Proposals are a public loss.

Officer response to above: the proposed development would contribute a significant number of self-contained homes to the Borough's housing targets. Please refer to 'Land use' and 'Affordable housing' section of report.

Green open space is insignificant in quantity and liable to abuse, limiting
its use by children and elderly. Studies show it would receive poor levels
of natural light limiting ecology of planting. Wind analysis shows that it
would suffer from wind conditions making it unsuitable for sitting.

Officer response to above: A financial contribution towards public open space is being sought in lieu of challenges providing it on site. Please refer to 'Public open space' section of report

 Daylight and Sunlight report shows that 50 homes will suffer from loss of light and suggests adequate daylight can only be provided to Chalk House if balconies and brise soleils are removed. Demonstrated a significant negative impact on the quality of life of existing residents.

Officer response to above: The losses are considered within an acceptable range for an inner London urban environment. Please refer to 'Impact on neighbouring amenity' section of report for detailed analysis on amenity impact.

### TRACT (Tenants and Residents Association Camden Town) – objection

- Substantial harm to setting of LB and CA
- Building next to the Roundhouse would be almost double its height

Officer response: please refer to 'Heritage' and 'Urban Design' sections of report

- Loss of 3,433 sqm of town centre office accommodation but no exceptional circumstances to justify.
- Policy requires development in Town Centres to include 50% of uplift as C3 residential but this development has none.

Officer response to above: please refer to 'Land use' section of report

Insufficient affordable housing.

Officer response to above: the application follows the Mayor's Fast Track approach of 35% affordable housing. Please refer to 'Affordable housing' section of report.

## Camden Cycling Campaign – comments and concerns

- No issue with proposed amount and location of cycle parking
- The CMP shows a gantry over the footpath but there is a segregated cycle track in-between what will be the impact?
- Concerned about the proposed routing as it passes through areas with large numbers of pedestrians; Kentish Town Road and Hawley Crescent are narrow with significant numbers of pedestrians and cyclists and are not suitable as construction routes; HGVs will be turning left.

Officer response: The submitted CMP is a draft and subject to further revisions in consultation with a Community Working Group and the Council, and once a contractor is on board. The Council will review the CMP with public safety as a key consideration and will need to be satisfied that all risks have been appropriate mitigated before the obligation is discharged.

#### Resident consultation

- 4.3 Five site notices (three on Chalk Farm Road, one near Haverstock School on Haverstock Hill and one on Belmont Street) were displayed around the site from the 14<sup>th</sup> February 2024 and again following revisions to the scheme, from 5<sup>th</sup> June 2024.
- 4.4 A press advert was placed in the Camden New Journal on the 22<sup>nd</sup> February 2024 and again on the 30<sup>th</sup> June 2024 following revisions to the scheme.
- 4.5 The Council received at 27 objections raising the following issues:

## Heritage and Conservation

- Will cause substantial harm to the listed Roundhouse and Regent's Canal CA, both of which are of London-wide if not nation-wide significance
- The existing building, designed by Richard Seifert, should be kept rather than redeveloped and listed.
- The application fails to preserve or enhance the two surrounding conservation areas.
- The towers will be highly visible from Primrose Hill CA and dominate views down Fitzroy Road.
- The proposal to demolish The Great Wall should not be allowed. It is important to the community

Officer's response: Please refer to the 'Heritage' section of the report.

- Officers and Historic England have identified less than substantial harm to the Roundhouse and Conservation Area, at the lower end of the scale.
- The existing building is of little merit, has been modified, and was granted a certificate of immunity from Listing.
- o The scheme would preserve the setting of nearby conservation areas.
- Whilst visible in a variety of views, its visibility or presence is not harmful.
- Only a small section of the original wall exists on the site, with part of the wall in St George's ownership, and the proposal does not currently include its removal. The existing building and ground floor wall are not historical.

### Design

- Height should be limited to 4 storeys to match existing building.
- 12 storey height risks turning CFR into an enclave of residential tower blocks.
- A rush to building at such height is changing the character of CFR and will place sightlines of Hampstead Heath and Primrose Hill under pressure.
- Goes against the Tall buildings Study and draft Local Plan.
- The Roundhouse would appear part of the same development given the shape of the proposal, reducing its landmark status.
- Proposal would be an eyesore to the character of the area and overshadow the Roundhouse as a cultural centre of the community.
- The density represents over-development.
- Copying the form of the Roundhouse is not very clever.
- Extreme and abrupt change in scale, height and urban grain, ignores local vernacular and will cause harm to this major and historic road.
- Decision to make the buildings circular is a very simplistic design decision that is unworthy of location next to important building like Roundhouse.
- Building Heights Study rules out potential for tall buildings.
- Extreme densities result in poor housing for both affordable housing occupants and students in terms of noise (due to adjacent railway), wind microclimate, lack of privacy, low daylight levels.
- New public open spaces will be next to a busy road, overshadowed and windy.
- Images provided in submission are selective and don't show true impact.

Officer's response: Please refer to the 'Urban Design' section of the report

# Quality of accommodation

- There is a lack of privacy between units with some located only 2m from each other.
- Inadequate private amenity space.

- Poor housing with lack of storage space and north facing single aspect units.
- The proposed wheelchair accessible student accommodation has the worst standard of accommodation in daylight and privacy terms, goes against all principles of inclusivity.

Officer's response: Please refer to the 'Quality of proposed housing' section of the report.

- Private amenity space meets space standard of London Plan
- o There are no north facing single aspect units; all units are double aspect
- The wheelchair accessible PBSA has been revised since submission to improve the overall standard of these units.

### **Amenity**

- Loss of light to The Chalk House, 74 Chalk Farm Road.
- Flats on CFR will be overlooked by towers of student housing 24/7 with more windows than existing office block, which will infringe on privacy
- Towers are likely to block out views of the sky from CFR facing flats.
- CFR flats will suffer from significant reductions to daylight and sunlight, resulting in flat becoming darker and unhealthier.
- Some flats will drop below legal limits of daylight.
- Do not accept the argument that just because we are inner city location, we should deal with more significant reductions.
- Report mislabels living room windows as bedroom windows which means the impact is more significant than conveyed in report.
- Construction period may lead to noise disturbance from London Underground (due to excavations) as occurred during Morrisons's supermarket construction.
- An influx of students is worrying for anti-social behaviour levels, which are already bad.
- The amount of recent and planned development in the area is excessive.
   Area feels like a building site with all the noise, dirt and inconvenience.
   Years of disruption has reduced quality of life.

Officer's response: Please refer to the 'Impact on neighbouring amenity', 'Safety and security' and 'Transport' (specifically on Construction Management Plan) sections of the report

The impact on The Chalk House is discussed in detail in the Impact on neighbouring amenity'. The recessed balconies and brise-soleils do make the properties more susceptible to greater losses owing to the greater reliance on daylight directly in front. The retained VSC to all properties is considered to be within acceptable levels for an inner London urban area such as Camden Town.

- A Student Management Plan and Public Realm Management Plan will be secured to mitigate potential anti-social behaviour.
- A Construction Management Plan will be secured which must consider cumulative impact of development and includes the requirement for a Community Working Group.

### Land use

- Exceptional circumstances for the loss of office has not been demonstrated, no marketing evidence.
- Student accommodation will not bring any value to the local community in the context of current affordable housing crisis.
- Students change the character of the neighbourhood and destroy community spirit.
- Proportion of student accommodation compared to affordable housing is totally out of kilter with local needs.
- Mixing student housing with permanent housing could lead to disharmony.
- Student numbers continue to fall in London so providing student housing is unrealistic. Likely it will become private housing once permission is granted.
- 35% of 130 units should give a requirement for 45 affordable dwellings whilst this development only provides 24. The fast-track threshold therefore hasn't been achieved.
- An entirely C3 scheme would provide more housing
- Families are not catered for by the development due to lack of larger units. The lack of larger homes is leading to reduction in school populations.
- Affordable housing is a scam as service charges are unchecked.

Officer's response: Please refer to the 'Land use', 'Affordable housing' and 'Housing mix' sections of the report

#### Public realm

- New public open spaces will be next to a busy road, overshadowed and windy.
- Construction of towers will lead to worse wind conditions along Chalk Farm Road.

Officer's response: Please refer to the 'Urban Design' and 'Microclimate' sections of the report

### Other

- The existing buildings are sound and serviceable. Demolition will have a negative impact on the environment.
- Misleading description, actually four buildings.

- No effort to discuss proposal with residents despite marketing across social media.
- Residents' needs are being ignored in favour of profit.

# Officer's response:

- On balance, demolition and rebuild best delivers on the strategic aims of the development plan. Refer to Energy and Sustainability section of the report for full assessment.
- The description identifies Building 1 as having three cylindrical volumes and the scope of the proposal is made clear throughout the submission.
- Refer to the 'developer-led consultation' section of the report for a summary of the engagement carried out.
- The scheme is expected to deliver a range of significant public benefits including housing delivery including significant affordable provision, public realm enhancements, promotion of active travel and employment and training opportunities.
- 4.6 At least 5 letters of support or 'no objection' were received which covered the following grounds:
  - Britain has a massive housing shortage and any increase in housing stock is welcome.
  - Outstanding architectural design that will upgrade the area and fits perfectly next to the Roundhouse.
  - The existing building is a blight on the high street and this proposal is an interesting design with high quality materials that will vastly improve the area around it.
  - Around Chalk Farm Station has been in a state of disrepair for a while and the proposal should boost footfall and encourage wider and higher quality range of commercial occupiers.
  - Excellent location for student housing and much needed affordable housing.
  - Will add vibrancy to an underutilised site.
  - Developers have a proven track record in the borough.
  - Positive to see regeneration and redevelopment of the site.

### Developer-led consultation

- 4.7 The developer has submitted a Statement of Community Involvement with the application that sets out the engagement undertaken by them throughout the planning process.
- 4.8 The developer had pre-application meetings with the GLA, with TfL also in attendance, in July 2023 and January 2024 and received written feedback that was shared with the LPA.

- 4.9 The developer presented to Historic England on 7<sup>th</sup> September 2023. HE's representation on the proposal is provided as part of the Council-led consultation responses.
- 4.10 Given the site's proximity to railway land, the developer has consulted Network Rail. The developer will need to enter into an agreement to ensure that the demolition and construction will not harm the safe operation of the railway. A 4m protection zone is factored into the proposal.
- 4.11 There has been ongoing engagement with the Roundhouse which has influenced the design of the scheme, particularly the fire exit strategy and the interface between the Roundhouse and public realm. Likewise, engagement has taken place with Berkeley St George, the developer of the adjacent Petrol Filling Station (PFS) site and its public open space (secured as a youth space), with a focus on ensuring the proposals are compatible.
- 4.12 During the pre-application phase, the developer met with the Ward Councillors and the then Cabinet Member.
- 4.13 Community consultation has included meetings with community organisations, newsletter distribution, establishing a project website and two rounds of engagement events (held 26<sup>th</sup> and 20<sup>th</sup> April 2023 and 13<sup>th</sup> and 16<sup>th</sup> September 2023).
- 4.14 The developer ran an online campaign to try to generate local support for the proposals, promoted via social media advertising. The landing page asked people to outline their reasons for support before automatically issuing them to the LPA.
- 4.15 The online survey generated 31 responses in total. Reviewing the content, 16 can be interpreted as objections, 14 as supports and 1 as neutral. These responses have not been included in the Council-led consultation summary but the content, both those in favour and against, raised the same issues and so are not repeated here.

# 5. POLICY

### National and regional policy and guidance

National Planning Policy Framework 2023 (NPPF)
A new draft NPPF is out for consultation
National Planning Practice Guidance (NPPG)
Written Ministerial Statement on First Homes (May 2021)

### London Plan 2021 (LP)

GG1 Building strong and inclusive communities

GG2 Making the best use of land

GG3 Creating a healthy city

GG4 Delivering the homes Londoners need

GG5 Growing a good economy

GG6 Increasing efficiency and resilience

D2 Infrastructure requirements for sustainable densities

D3 Optimising site capacity through the design led approach

D4 Delivering good design

D5 Inclusive design

D6 Housing quality and standards

D7 Accessible housing

D8 Public realm

D9 Tall buildings

D11 Safety, security and resilience to emergency

D12 Fire safety

D13 Agent of Change

D14 Noise

H1 Increasing housing supply

H4 Delivering affordable housing

H5 Threshold approach to applications

H6 Affordable housing tenure

H10 Housing size mix

H15 Purpose-built student accommodation

S4 Play and informal recreation

E1 Offices

E2 Providing suitable business space

E3 Affordable workspace

E11 Skills and opportunities for all

HC1 Heritage conservation and growth

HC3 Strategic and local views

HC4 London views management framework

G4 Open space

G5 Urban greening

G6 Biodiversity and access to nature

G7 Trees and woodland

SI1 Improving air quality

SI2 Minimising greenhouse gas emissions

SI3 Energy infrastructure

SI4 Managing heat risk

SI5 Water infrastructure

SI6 Digital connectivity infrastructure

SI7 Reducing waste and supporting the circular economy

SI12 Flood risk management

SI13 Sustainable drainage

T1 Strategic approach to transport

T2 Healthy Streets

T3 Transport capacity, connectivity and safeguarding

T4 Assessing and mitigating transport impacts

T5 Cycling

T6 Car parking

T7 Deliveries, servicing and construction

T9 Funding transport infrastructure through planning

FF1 Delivery of the plan and planning obligations

## London Plan Guidance

# Local policy and guidance

# Camden Local Plan (2017) (CLP)

Policy G1 Delivery and location of growth

Policy H1 Maximising housing supply

Policy H4 Maximising the supply of affordable housing

Policy H6 Housing choice and mix

Policy H7 Large and small homes

Policy H9 Student housing

Policy C1 Health and wellbeing

Policy C3 Cultural and leisure facilities

Policy C5 Safety and security

Policy C6 Access for all

Policy E1 Economic development

Policy E2 Employment premises and sites

Policy A1 Managing the impact of development

Policy A2 Open space

Policy A3 Biodiversity

Policy A4 Noise and vibration

Policy A5 Basements

Policy D1 Design

Policy D2 Heritage

Policy D3 Shopfronts

Policy D4 Advertisements

Policy CC1 Climate change mitigation

Policy CC2 Adapting to climate change

Policy CC3 Water and flooding

Policy CC4 Air quality

Policy CC5 Waste

Policy TC1 Quantity and location of retail development

Policy TC2 Camden's centres and other shopping areas

Policy TC4 Town centre uses

Policy T1 Prioritising walking, cycling and public transport

Policy T2 Parking and car-free development

Policy T3 Transport infrastructure

Policy T4 Sustainable movement of goods and materials

Policy DM1 Delivery and monitoring

### Supplementary Planning Documents and Guidance

Access for All CPG - March 2019

Air Quality - January 2021

Amenity - January 2021

Basements - January 2021

Biodiversity CPG - March 2018

Design - January 2021

<u>Developer Contribution CPG - March 2019</u>

Digital Infrastructure CPG - March 2018

Employment sites and business premises - January 2021

Energy efficiency and adaptation - January 2021

Housing - January 2021

Planning for health and wellbeing - January 2021

Public open space - January 2021

Student housing CPG - March 2019

Town centres and retail - January 2021

Transport - January 2021

Trees CPG - March 2019

Water and flooding CPG - March 2019

## Other guidance:

<u>Planning Statement - Intermediate Housing Strategy and First Homes (2022)</u> <u>Camden Goods Yard Planning Framework (2017)</u>

Regent's Canal Conservation Area Appraisal (2008)

Primrose Hill Conservation Area Statement (2000)

Eton Conservation Area appraisal and management strategy (2002)

Harmood Street Conservation Area appraisal and management strategy (2005)

# Draft Camden Local Plan (DCLP)

The Council has published a new <u>Draft Camden Local Plan</u> (incorporating Site Allocations) for consultation (DCLP). The consultation closed on 13 March 2024. The DCLP is a material consideration in the determination of planning applications but has limited weight at this stage. The weight that can be given to it will increase as it progresses towards adoption (anticipated 2026).

# DCLP Draft Site Allocation - C9 (CGY4)

The DCLP identifies the site as a draft site allocation. It is allocated for employment, self-contained homes, student accommodation, and retail/restaurant. The indicative capacity in the draft allocation is 100 additional homes.

#### 6. ASSESSMENT

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

7	LAND USE
8	AFFORDABLE HOUSING
9	HOUSING MIX
10	QUALITY AND ACCESSIBILITY OF PROPOSED HOUSING
11	IMPACT ON NEIGHBOURING AMENITY

12	URBAN DESIGN
13	HERITAGE
14	NATURE CONSERVATION, LANDSCAPE, AND BIODIVERSITY
15	PUBLIC OPEN SPACE
16	HEALTH IMPACT
17	BASEMENT CONSIDERATIONS
18	ENERGY AND SUSTAINABILITY
19	AIR QUALITY
20	MICROCLIMATE
21	WATER, FLOOD RISK AND DRAINAGE
22	TRANSPORT AND HIGHWAYS
23	EMPLOYMENT AND TRAINING
24	FIRE SAFETY
25	SAFETY AND SECURITY
26	REFUSE AND RECYLING
27	PLANNING OBLIGATIONS
28	COMMUNITY INFRASTRUCTURE LEVY
29	CONCLUSION – PLANNING PERMISSION
30	CONCLUSION – LISTED BUILDING CONSENT
31	RECOMMENDATIONS
32	LEGAL COMMENTS
33	CONDITIONS – PLANNING PERMISSION
34	INFORMATIVES - PLANNING PERMISSION
35	CONDITIONS - LISTED BUILDING CONSENT

# 7. LAND USE

# General principles

7.1 This section deals solely with matters of land use and considers their compliance with the development plan. The proposed development is for the demolition of all existing office buildings and structures on the site and redevelopment with two main uses: purpose-built student accommodation

with ancillary facilities (Sui Generis) and permanent self-contained affordable housing (Class C3). Two commercial Class E units would be provided at ground floor level.

7.2 The existing and proposed land uses are as follows:

Land use floorspaces						
Use Class	Description	Existing GIA (sqm)	Proposed GIA (sqm)	Difference GIA (sqm)		
Sui Generis	Student accommodation with ancillary facilities	0	8,858	+ 8,858		
C3	Dwellings (affordable)	0	3,505	+ 3,505		
Class E	Commercial	3,433	852	- 2,581		
Total	All uses	-3,433	+13,215	+ 9,782		

Table 2 - Existing and proposed land uses on the site (GIA)

- 7.3 The proposals involve an intensification of the site to optimise capacity through a design-led approach, as promoted by policy D3 of the London Plan. The policy requires development to make the best use of land in terms of both form and land use, responding to the site's context and capacity for growth. Assessment of the acceptability of a demolition and rebuild approach is discussed in detail in the Energy & Sustainability section of the report, whilst design considerations are discussed in the Urban Design section.
- 7.4 Policy G1 of the Camden Local Plan (CLP) states that the Council will create the conditions for growth to deliver the homes, jobs, infrastructure, and facilities to meet Camden's identified needs and harness the benefits for those who live and work in the borough. It seeks to support development that makes best use of its site, taking into account a range of factors including quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility. The policy expects a mix of uses where appropriate including an element of self-contained housing. In terms of where the most significant growth is expected, part f of the policy directs development to highly accessible locations including Camden Town Centre.
- 7.5 In response to G1, a mix of uses is proposed including self-contained housing. Further, the site is highly accessible by public transport with a PTAL rating of 6a.
- 7.6 Subject to the assessment of additional planning considerations, which will be covered in later sections of the report, the principle of site intensification to provide a mix of uses including student accommodation, affordable

housing and flexible commercial space is supported by officers and complies with national, regional and local planning policy.

## Draft site allocation – C9 (CGY4)

- 7.7 The site is not an adopted site allocation but is included as a draft allocation in the DCLP (under <u>site allocation reference C9 (CGY4)</u>). The allocated uses in the DCLP are for self-contained homes, student accommodation, and commercial uses, reflecting the site's town-centre location and LP classification.
- 7.8 The new draft site allocation in the DCLP allocates the site as follows:

Reference	Site Name	Proposed uses	Indicative homes capacity
<u>C9 (CGY4)</u>	100, 100a and 100b Chalk Farm Road	Employment, self-contained homes, student accommodation, and retail/restaurant	100

Table 3 - Draft site allocation (2024) reference C9

- 7.9 Given the early stage of the DCLP, officers have given it only limited weight as a planning consideration. Nonetheless, the proposal would offer a mix of uses including self-contained C3 homes, all of which are affordable, student housing, and commercial floorspace which aligns with the proposed ambitions for this site in emerging policy.
- 7.10 The proposal would provide 30 self-contained Class C3 homes, 24 cluster (shared) student rooms, and 240 student studios, making a significant contribution to the area's housing provision. By providing a focus on student housing, more housing can be delivered on the site than an equivalent of only self-contained C3 homes because the units of occupation are much smaller. For the purposes of the Housing Delivery Test (HDT), non-self-contained student rooms count at a rate of 2.5 rooms for every home. This means the 24 cluster rooms represent an equivalent of 9.6 homes for HDT purposes. The self-contained student studios count on a 1 to 1 basis, and so represent 240 homes, albeit smaller ones.
- 7.11 As a result, the proposal performs very well against the draft allocation's indicative capacity of 100 homes, with a total equivalent of 279.6 homes across all housing types.
- 7.12 However, the draft allocation also expects the re-provision of the employment floorspace, reflected in the lower indicative housing capacity. Although some commercial floorspace is re-provided, along with the employment associated with the student housing, it falls short of full reprovision. The trade-off to achieve the high level of housing on the site is less

re-provision of the commercial employment (formerly office) floorspace. Indeed, the draft allocation expects the collaboration and co-design of proposals in relation to the neighbouring PFS site, which is wholly employment, to ensure a coherent and optimised approach across both sites to deliver efficient use of land, a compatible mix of uses and higher quality townscape. It expects this approach to assess how employment (offices) and residential uses can be optimised across the sites. The loss of employment office use is covered in more detail below.

- 7.13 The draft site allocation also notes the importance of protecting established night-time entertainment uses, mentioning the neighbouring Roundhouse venue. This mirrors the agent of change principle outlined in the LP and CLP, also incorporated into the NPPF in paragraph 193. This principle is that existing businesses and venues should not have unreasonable restrictions placed on them because of development granted after they were established. This means the "agent of change" in other words, the thing that brings about change in an area like the proposed student housing is responsible for taking steps to safeguard established uses and activities. The uses on site have been positioned to limit likelihood of noise complaints which could threaten the operation of the Roundhouse, along with a series of robust noise insulation and control which is covered in more detail in other sections of the report.
- 7.14 Overall, the proposal reflects the emerging policies in the site allocation of the DCLP, albeit with a shift in emphasis from employment to housing, helping with increased housing provision for the borough and its performance in terms of meeting housing targets.

#### Loss of office use

- 7.15 The existing building contains 3,433 sqm of office floorspace, of which 2,840 sqm is classified as useable floor space. The proposals include 852 sqm of ground floor commercial use fronting Chalk Farm Road. Overall, there is a loss of 1,988 sqm of office or commercial space.
- 7.16 Policy E1 safeguards existing employment sites and premises in the borough that meet the needs of industry and other employers whilst policy E2 resists development of business premises and sites for non-business use unless it can be demonstrated that the site or building is no longer suitable for business use.
- 7.17 The building has been vacant for a number of years and was last occupied by One Housing Group who have relocated elsewhere in the Borough. The office space is outdated, and a substantial retrofit exercise would need to take place to bring the building up to standard as discussed in more detail in the Energy & Sustainability section of the report. In the absence of marketing evidence, it has to be expected that the site is still suitable for a business

use, given the commercial town centre location and continued demand for office floorspace in the surrounding area.

- 7.18 As such, there is a conflict with policy E2, but this is moderated by site specific factors. The proposal has been considered in the context of a changing urban environment whereby several nearby sites are coming forward for development at a similar time. This includes the site to the east, the former PFS site which has an extant permission for office use. Rather than seeking a mix of uses on each site which could result in a less efficient development, a mix of uses is achieved across both sites. This multi-site approach is supported in the draft Site Allocation (ref. C9) as mentioned above.
- 7.19 Furthermore, the proposed commercial floorspace, whilst a reduction compared to existing, would be of higher quality, fully accessible and provide much improved engagement with the street. The new commercial uses would enhance the town centre by creating an inviting and active frontage as envisioned by the Camden Goods Yard Planning Framework (2017).
- 7.20 It is noted that a similar loss of employment space was accepted as part of a previous permission on the site (ref. 2013/5402/P) where the Council acknowledged that, whilst it would technically represent a reduction in job opportunities on the site, the new smaller commercial space would be significantly better quality and more suited to SMEs. The proposed commercial units in the current application also have these attributes.
- 7.21 Table A1.1 of the London Plan designates Camden Town Centre as having high commercial growth potential and gives it an Office Guideline of C which recommends the protection of small office capacity in reflection of the demand for office functions, generally within smaller units. This is reflected in the provision of a smaller commercial employment space on this site, with the neighbouring PFS providing a large-scale employment use, together offering a range of spaces and employment opportunities in the area.
- 7.22 It is also important to recognise that the Purpose-Built Student Accommodation (PBSA) will provide some employment opportunities. There will be on-site maintenance staff including cleaners and security as well as management positions. The submission states there will be approximately 10 employment opportunities directly associated with the PBSA element of the scheme.
- 7.23 In this case there is a loss of employment floorspace which is contrary to adopted policy and the draft site allocation, albeit this carries limited weight. However, the site has been vacant for some time, is in poor condition, and when viewed in the context of approved proposals for the neighbouring PFS site, would still make a contribution to a wider employment offer in the area,

- and the proposal focuses on housing provision (the priority land use of the development plan) at a time when housing targets are not being met.
- 7.24 Where the loss of employment floorspace is accepted, paragraph 54 of CPG Employment sites requests a financial contribution from developers to offset the loss. The contribution will be put towards measures which create or promote opportunities for employment or training of local people, including the provision of affordable workspace. Based on a loss of 2,016 sqm, the calculation is:
  - Employment floor space lost (sqm) / space requirement per full time employee = full time jobs lost.
  - Full time jobs lost x 21% [% of Camden residents who work in Camden]
     x £3,995 [cost to provide training per employee] = £contribution
- 7.25 For this proposal the contribution is calculated as follows:
  - 1,988/12 = 166 FTE jobs lost
  - 168 x 21% (35) X £3995 = £139,825 contribution
- 7.26 The financial contribution will be secured by Section 106 agreement.

# Proposed student housing (Sui generis)

- 7.27 The predominant use of the proposal is Purpose-Built Student Accommodation (PBSA) provided as a combination of 240 private studio rooms and 24 affordable cluster rooms, together with communal ancillary student facilities. PBSA is defined by the London Plan as housing dedicated, at least in term time, to full-time students.
- 7.28 London Plan Policy H15 requires boroughs to ensure that local and strategic need for purpose-built student accommodation is addressed, and that it contributes to a mixed and inclusive neighbourhood. It sets out that there is an established need for 3,500 bed spaces annually over the London Plan period (2021-2031) (equating to 35,000 bed spaces over the plan period). It encourages Boroughs to develop student accommodation in locations well-connected to local services by walking, cycling and public transport, as part of mixed-use regeneration schemes.
- 7.29 The London Plan recognises that London's higher education providers make a significant contribution to London's economy and labour market and that it is important that their attractiveness and potential growth are not compromised by inadequate provision for new student accommodation. Paragraph 4.15.1 of the London Plan sets out that the housing need of students in London, whether in Purpose Built Student Accommodation (PBSA) or shared conventional housing, is an element of the overall housing need for London. The completion of new PBSA therefore contributes to

meeting London's overall housing need and is not separate or in addition to this need.

- 7.30 In recognition of the housing need met by student accommodation, its development contributes towards the Borough's Housing Delivery Test. Based on the guidance included in para 4.1.9 of the London Plan, each self-contained studio room would contribute on a 1:1 basis whilst 2.5 cluster rooms constitute 1 home. As such, the PBSA element would contribute the equivalent of 249.6 homes to the Borough's housing supply.
- 7.31 At a local level, policy H9 of the CLP seeks a supply of student housing to meet or exceed Camden's target of 160 additional places per year and will support the development of student housing subject to a number of criteria, provided below together with a brief assessment of how the proposal performs:
  - a. will not involve the net loss of 2 or more self-contained homes;

No

b. will not prejudice the Council's ability to meet the target of 742 additional self-contained homes per year;

As set out above, the proposal would contribute 249.6 homes to LB Camden's housing targets and be provided alongside 30 affordable housing homes.

 will not involve a site identified for self-contained housing through a current planning permission or a development plan document unless it is shown that the site is no longer developable for self-contained housing;

There is no current planning permission for self-contained housing on the site. The draft site allocations (not yet an adopted development plan document) identifies the site for both self-contained housing and student accommodation.

 complies with any relevant standards for houses in multiple occupation (HMOs);

Yes

e. serves higher education institutions that are accessible from it;

There are many higher education institutions that are easily accessible from the application site, including those in Central London and King's Cross.

f. includes a range of flat layouts including flats with shared facilities wherever practical and appropriate;

The proposal includes three types of layouts including cluster rooms with shared facilities, private studios and larger private studios which incorporate the DDA Accessible rooms.

g. has an undertaking in place to provide housing for students at one or more specific education institutions, or otherwise provide a range of accommodation that is affordable to the student body as a whole;

It is a requirement of Policy H15(3) of the London Plan that the majority of the bedrooms in the development, including all of the affordable bedrooms, are secured through a nomination agreement. Accordingly, a Student Housing Nomination Agreement will be secured by Section 106 agreement which requires the applicant to try to enter into a Nominations Agreement with a Higher Education Institution for at least half of the housing (51%) which in this case has been agreed at 135 student bedrooms.

h. will be accessible to public transport, workplaces, shops, services, and community facilities;

The site has excellent public transport accessibility with a wide range of local shops and services nearby.

- contributes to creating a mixed, inclusive and sustainable community;
   and
- j. does not create a harmful concentration of such a use in the local area or cause harm to nearby residential amenity

The development is located in Camden Town ward. Appendix B of CPG Student Housing reports that 8% of residents are full time students (based on 2011 Census data) and ranks Camden Town 9th out of the Borough's 18 wards (where 1 = highest student share). As consultation responses highlight, there is other student accommodation in the area but Camden Town is a dense urban area with a diverse community, to which the student population contributes. The proposed development is not considered to lead to a harmful concentration of students.

Furthermore, the PBSA will be managed by an accredited PBSA manager. A draft Student Management Plan (SMP) has been submitted with the application and a full SMP will be secured by s106 agreement.

7.32 Policy H9 of the draft CLP reaffirms the current Local Plan policy and recognises that purpose-built student accommodation can help to limit additional pressure on the wider private rented market, releasing it for more

general needs housing. It notes that the interest in developing student accommodation in the borough appears to have diminished since adoption of the previous Camden Local Plan as indicated by a number of planning consents failing to progress on site.

- 7.33 The supporting text of policy H9 (para 3.262) recognises there are often concerns around student housing by the established local community, for example around noise disturbance and community cohesion. CPG Student Housing requires a draft Student Management Plan (SMP) to be submitted with any proposal for student housing. This is to ensure the health and wellbeing of students but also to mitigate potential impact of the development on neighbours and the local area. A draft plan has been submitted by CRM Students, an established student management company. The plan covers the proposed approach to travel and deliveries; safety and security of students; day-to-day management processes including pastoral care and welfare, anti-social behaviour, operations and maintenance. The plan identifies partnership working with neighbours including St George, Roundhouse and the local Community Support Team as essential to manage issues such as crowd control during events, anti-social behaviour and fire safety. In terms of security, the plan sets out that students would be educated on safety and security matters at move-in stage. The scheme would include comprehensive CCTV installation together with a security presence on site. A controlled electronic entry system will operate to individual blocks and communal areas.
- 7.34 A full, more detailed and bespoke Student Management Plan will be secured by s106 agreement once the accommodation provider is on board. To align with Agent of Change principles, it will include provision for the inclusion in prospective students' contracts that the Roundhouse is a noise generating use and to make full use of the building's soundproofing measures.
- 7.35 The applicant intends that the accommodation will be used outside of term time. This accords with *CPG Student Housing* and *LPG Purpose-built Student Accommodation* which recognises how temporary use of otherwise empty accommodation ensures blocks remain active throughout the year as well as helping to keep costs down for students. The CPG sets out that the Council will use a Non-student Management Plan planning obligation to secure the nature of alternative use, ensure that it does not disrupt occupation by students who wish to let their place for the entire academic year; duration of non-student lettings for no more than 14 weeks in any academic year.

### Proposed self-contained residential (Use Class C3)

7.36 Thirty self-contained C3 residential homes are proposed, equating to a floorspace of 3,505 sqm. All homes would be affordable, split across social-affordable rent (57%) and intermediate rent tenures (43%). Given the hybrid

approach, affordable housing will be assessed together with the affordable student accommodation in the 'Affordable housing' section of the report. Standard of accommodation, housing mix and accessibility are discussed in the relevant sections of the report.

- 7.37 Policy H1 regards self-contained housing as the priority land use of the Local Plan. The London Plan sets housing targets for local authorities in London, for Camden the target is 1,038 per year for the 10-year period. To ensure housing targets are met, Policy H1 states that boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through development plans and planning decisions.
- 7.38 Student housing is considered to be residential floorspace and therefore the requirements of Policy H2 do not apply.
- 7.39 The Housing Delivery Test (HDT) is an annual measurement of housing completions introduced by the government. It measures whether development plan requirements (or, in some cases, local housing need calculated by the government's standard method) have been met over the last 3 years. The government's most recently published figure is for 2022, when the government's measurement for Camden was 69% which means that Camden's development plan policies are treated as being out-of-date in relation to housing provision.
- 7.40 The presumption in favour of sustainable development in paragraph 11(d) of the NPPF is engaged, and great weight should be given to the provision of housing in decision making. The NPPF indicates that applications should be granted unless their adverse impacts would significantly and demonstrably outweigh their benefits when assessed against NPPF policies as a whole.
- 7.41 The well-connected town centre location is suitable for housing. Policy TC2 supports the development of housing within centres where this does not prejudice the town centre function and the ability of the ground floor to be used for town centre uses. The surrounding character along Chalk Farm Road is mixed use with commercial uses at ground floor level and residential above, and larger residential buildings further away from the high street. The proposal would be situated away from the main shopping frontage, provide town centre uses at ground floor level, and would therefore not have a harmful impact on the town centre function.
- 7.42 As such, the provision of 30 self-contained and affordable homes is welcomed.

# Proposed Commercial (Use Class E)

7.43 Camden Local Plan policy TC1 states that new shopping and related town centre uses will be focussed in existing centres and identifies significant additional provision in the Town Centre of Camden Town.

7.44 The proposal includes 824 sqm of Class E use at ground floor level which would be built out as two separate units. Use Class E is a diverse and flexible use class encompassing a range of commercial, high street, and employment uses. It is envisaged that the larger unit (Commercial Unit 1 on plans) would be used as office workspace whilst the smaller unit would be used as a café or retail space. Both units have good open frontage on to Chalk Farm Road which would bring activation to the street. The proposal is entirely in line with the draft C9 Site Allocations which states that a key objective is to bring better engagement between the site and Chalk Farm Road which can be achieved by providing appropriate town centre uses opening on to the street. The commercial use would also have the ability to re-provide an element of the previous employment use on site.

# Agent of change and impact of uses

- 7.45 As explained above, the draft site allocation, development plan and NPPF all highlight the importance of the Agent of Change principle, ensuring that new uses introduced in the area to not result in unreasonable restrictions on existing uses particularly the Roundhouse.
- The London Plan categorises Camden Town as a Major Town Centre with an NT1 night-time economy classification (Ref 23 in <u>Table A1,1 of the London Plan</u>). This means it is of international or national significance. LP policy SD8 says Major Town Centres should focus on higher density employment, leisure and residential development, having regard to night-time economy roles. LP policy HC6 supports the night-time economy by protecting evening and night-time cultural venues such as the Roundhouse. These points are emphasised in LP policy D13, as well as the Camden Local Plan, which stresses the importance of Agent of Change.
- 7.47 The proposed residential uses both the affordable housing and the PBSA will be new noise-sensitive development right next to the Roundhouse, and in a town centre location with an important focus on night-time economy uses.
- 7.48 In line with the policies, the scheme has been designed separating new noise-sensitive development where possible from existing noise-generating businesses and uses through distance, screening, internal layout, soundproofing, insulation and other acoustic design measures. The more sensitive permanent C3 housing has intentionally been placed away from the Roundhouse to protect it from the noise and disturbance generated largely by visitors to the live music venue. The PBSA will have a management plan which will support the Agent of Change clause, notifying occupiers of the potential noise impacts, and of the robust noise insulation that has been designed into the scheme to ensure risk of complaints is minimised.

### Land use conclusion

- 7.49 The proposal would provide much needed affordable housing together with student accommodation, for which there is an identified need. The proposed new homes and student accommodation, equating to an equivalent of 279.6 homes, within a sustainable location on brownfield land would contribute towards the strategic objectives of the development plan and contribute to the borough's housing supply. This housing provision complies with the development plan and the NPPF in land-use terms and has been given significant weight.
- 7.50 The impact on employment capacity in the area resulting from the loss of office would be mitigated by the office-led development on the neighbouring site, the provision of a reduced quantum of high-quality commercial space within the proposal, and a financial contribution of £139,825 towards measures which create or promote opportunities for employment or training of local people. The scheme would carefully manage the relationship to the Roundhouse and other night-time uses, safeguarding their ongoing use and the function of the town centre, and so the land uses are supported and in line with the development plan as a whole.

#### 8. AFFORDABLE HOUSING

- 8.1 London Plan Policy H4 seeks to maximise affordable housing delivery, with the Mayor setting a strategic target for 50% of all new homes to be genuinely affordable. Similarly, Policy H4 of the Camden Local Plan aims to maximise affordable housing in developments to meet the needs of households unable to access market housing.
- 8.2 Policy H5 (Threshold approach to affordable housing) of the London Plan allows for a Fast Track Route whereby if a minimum of 35% affordable housing is proposed then a viability assessment or late-stage review is not required. To ensure the applicant builds out the scheme, the requirement for an Early Stage Review will be secured by the s106 agreement and triggered if the scheme is not implemented within two years of the permission being granted.
- 8.3 The proposed development seeks to follow the Fast Track Route with a blended affordable provision consisting of 30 affordable self-contained homes (Class C3) and 24 cluster rooms of student accommodation. This approach has been accepted by the GLA. Overall, the proposed affordable meets the 35% threshold in terms of habitable rooms and floorspace as demonstrated by the tables below.

PBSA Hab Rooms (Incl. KDLs)	268 *
Affordable Hab Rooms	105 (in AH block)
Total Hab Rooms	373 (268+105)
35% Equivalent	131 (373x0.35)
Hab Room Shortfall	26 (131-105)
Hab Rooms Provided by ASA (Incl KDLs)	28 (24 cluster beds + 4
	KDLs)**

<sup>\*</sup>The PBSA HRs include the KDLs (i.e. 264 beds plus four KDLs).

Table 4 - Affordable housing by habitable rooms

PBSA GIA (SQM)	8,861*
Affordable GIA (SQM)	3,513
Total GIA (SQM)	12,371
Current AH%	28.37%
35% AH	4,330
GIA Shortfall (SQM)	820
Shortfall %	6.63%
PBSA GIA/Bed SQM	33.56
Additional PBSA beds required	24.43

Table 5 - Affordable housing by GIA

### Affordable student accommodation

- 8.4 The definition of Affordable Student Accommodation (ASA) (as provided by para 4.15.8 of the London Plan), is a PBSA bedroom that is provided at a rental cost for the academic year equal to or below 55 per cent of the maximum income that a new full-time student studying in London and living away from home could receive from the Government's maintenance loan for living costs for that academic year.
- 8.5 The ASA provision comprises 24 ensuite cluster rooms with shared kitchen facilities. The affordable provision would be interspersed with the other studio flats on each floor and would have the same access to all facilities. The ASA would be secured by s106 agreement.
- 8.6 Policy H15 of the London Plan says to provide greater certainty, speed up the planning process, and increase the delivery of affordable student accommodation, the 35% threshold applies for PBSA schemes to take advantage of the Fast Track Route. To be eligible, the amount of affordable student accommodation provided should be at least 35% of student bedrooms in the development. If the required threshold for affordable student

<sup>\*\*</sup>The calculation shows a requirement of 25.55 HRs and we are providing 28 (24 clusters and 4 KDLs).

accommodation is not met, a scheme will be considered under the Viability Tested Route in line with Policy H5 (Threshold approach to applications).

8.7 However, the Mayor's draft PBSA LPG sets out under para 2.5.4 that while PBSA need should be addressed in line with policy H15, the inclusion of conventional (Class C3) housing may nonetheless be acceptable and even desirable on larger sites as part of the pursuit of mixed and inclusive neighbourhood objectives. Given the Borough's need for self-contained housing, and particularly affordable housing, officers welcomed the proposed hybrid approach which combines affordable self-contained homes with affordable student housing. It is accepted that the 35% threshold has been met and that the scheme would qualify as a fast track scheme. This approach is supported by the Council's Affordable Housing Development Co-ordinator and the GLA. An early-stage review shall be secured by legal agreement if the permission (if granted) is not implemented within two years.

#### Affordable self-contained homes

- 8.8 The 30 affordable homes include 17 homes (57%) for social-affordable rent and 13 homes (43%) for intermediate rent. Three wheelchair accessible homes are provided in the social-affordable rent tenure.
- 8.9 These homes will be delivered in accordance with the Council's Intermediate Housing Strategy targeting the majority of rents at those on the updated incomes of £31,950 £42,600k.
- 8.10 The NPPF stipulates that affordable housing for rent should be managed by a Registered Provider (RP) and should remain at an affordable price for future eligible households. The Council has agreed an Approved Strategic Partner List and requires affordable housing to be transferred to a partner on the list. CPG Housing recommends that developers involve a provider from the earliest stages of housing design to ensure the homes meet the requirements. A s106 agreement will be used to ensure that the developer will select a housing provider from the approved list (and will be subject to the Council's written approval) and occupation of market homes (in this case the student housing) will not take place until the affordable homes have been transferred to the provider.
- 8.11 The developer has not yet selected an affordable housing partner but have had interest from three RPs, only one of which (Sovereign Network Group) is currently on the Council's approved list of housing providers. A second RP (Central & Cecil) has an existing portfolio of properties in the Borough but is not on the Council's approved list. Were the developer interested in pursuing this RP, they would be required to apply to join the list and enter into a nominations agreement with the Council. The s106 will stipulate the need for the Registered Provider to be on the Council's approved list.

### First Homes policy

8.12 The national First Homes policy has now come into effect for developments that trigger an affordable housing contribution. First Homes are a new type of discount housing for sale. National policy indicates that First Homes should form 25% of the affordable housing sought in a development, and that where a payment in lieu (PIL) is sought in place of affordable housing, 25% of the value should be used to deliver First Homes. However, the Council has adopted a Planning Statement on the Intermediate Housing Strategy and First Homes, which indicates that First Homes in Camden would not be affordable to median income residents, and consequently First Homes will not be sought in the borough. Having regard to the national and local policies relating to First Homes, any funds arising from PIL and deferred affordable housing contributions are expected to contribute to the Council's preferred affordable housing types identified by Local Plan Policy H4 and CPG Housing 2021, namely social-affordable and intermediate rented housing.

# Affordable housing conclusion

- 8.13 The proposal meets the 35% affordable housing London Plan Fast Track target through a hybrid approach, bringing forward 30 conventional C3 affordable homes alongside a proportion of ASA. The proposed affordable Class C3 housing equates to 28% of the scheme based on both floorspace (GIA) and habitable rooms in line with London Plan and Camden requirements. Alongside this, the 24 cluster beds (and associated shared facilities) in the PBSA would be allocated as ASA to 'top-up' the affordable housing offer. This blend would bring the overall affordable housing provision to 35% (in terms of both floorspace and habitable rooms). Accordingly, there is no requirement to submit a financial viability appraisal.
- 8.14 The decision to maximise the provision of affordable self-contained housing over ASA aligns with the strategic objectives of both the London Plan and Local Plan.

### 9. HOUSING MIX

9.1 Policy H7 seeks a mix of large and small homes in each development (where large homes are defined as those with 3 bedrooms or more) and expects developments to contribute to the priorities set out in the Dwelling Size Priorities Table.

	1-bedroom (or studio)	2-bedroom	3-bedroom	4-bedroom (or more)
Social-affordable rented	lower	high	high	medium
Intermediate affordable	high	medium	lower	lower
Market	lower	high	high	lower

Table 6 - Dwelling Size Priorities (Local Plan Table 1)

- 9.2 The table above shows that within the Social Affordable Rented (SAR) tenure, there is a higher priority for 2 and 3-bed homes, with medium demand for 4-beds (or more). Within the Intermediate tenure, in this case Intermediate Rent (IR), there is high priority for 1-bed homes, with medium demand for 2-bed.
- 9.3 CPG Housing indicates that within the intermediate rented sector, the Council will seek a substantial proportion of studio or 1-bedroom homes, and a proportion of homes genuinely suitable for sharers (2b4p homes, ideally with two bathrooms or shower-rooms).
- 9.4 The proposed mix of C3 residential accommodation, across tenures, is set out below:

Tenure	Size (priority level)	Number	% of tenure	% of total	M4(3)(2)(b)
Social affordable rent	1B2P (lower)	3	18%	10%	
	2B3P (high)	1	35%	20%	1 (1st floor)
	2B4P (high)	5			
	3B4P (high)	2	47%	27%	2 (2nd, 3rd floors)
	3B5P (high)	6			
Sub-total		17	100%	57%	
Intermediate rent	1B2P (high)	6	46%	20%	
	2B4P (medium)	6	46%	20%	
	3B5P (lower)	1	8%	3%	
Sub-total		13	100%	43%	
Total		30		100%	

Table 7 - Dwelling mix summary for both tenures (SAR and IR)

- 9.5 In terms of large and small homes, the proposed development would deliver 9 large homes (3 bed) and 21 small homes (1 and 2-bed) across both tenures which is an acceptable mix.
- 9.6 The mix of homes proposed for SAR is broadly consistent with the Dwelling Size Priorities table with 82% of SAR homes targeting the high priority homes. Following negotiations, most 2-beds are now designed for 4 people and 3-beds designed for 5 people which is welcomed. The 4-bed homes initially proposed have been replaced with 3-beds to better align with the priority sizes for SAR.

- 9.7 The proposed mix of intermediate rented homes contains equal numbers of 1 and 2-beds which attract high and medium priority respectively. Following negotiation, the 2-beds are now all designed for 4 people so are well-suited to the sharer market or smaller families. There is also a larger 3-bed home which is of lower priority but will nonetheless meet a need. The mix is broadly consistent with the Local Plan Dwelling Size Priorities with 92% of IR homes targeting the high or medium priority homes.
- 9.8 Overall, the scheme provides a balanced mix of homes with 67% of the provision of high priority dwelling sizes (and a further 20% of medium priority). The provision represents a welcomed contribution to the identified needs in the development plan in accordance with CLP policy H7.

### 10. QUALITY AND ACCESSIBILITY OF PROPOSED HOUSING

- 10.1 CLP policy H6 is about housing choice and mix, and it aims to minimise social polarisation and create mixed, inclusive, and sustainable communities, by seeking high quality accessible homes and a variety of housing suitable for Camden's existing and future households.
- In line with LP policy D6 and CLP policies H6 and D1, housing development should be high quality and provide adequately sized homes and rooms, and maximise the provision of dual aspect dwellings. CLP policy A2 encourages opportunities to provide private amenity space which is reflected in a requirement to provide amenity space in LP policy D6. CLP policy A1 seeks to protect the amenity of occupiers in relation to a number of factors, including privacy, outlook, light, and noise. CLP policy A4 says suitable noise and vibration measures should be incorporated in new noise sensitive development. The agent of change principle (see Land Use section) means this is particularly important in this case.
- 10.3 LP policy D5 says development should provide the highest standard of accessible and inclusive design, which allows them to be to be used safely, easily and with dignity by all, also reflected in CLP policies D1, H6, and C6.
- In terms of the student housing, it is not assessed against the same standards as permanent self-contained residential; however, LP para 4.15.6 states that PBSA should provide adequate functional living space and layouts and be of high-quality design. CPG Student Housing requires student housing developments include a range of flat layouts including cluster flats, be designed to meet relevant standards and provide safe, secure, functional, adaptable and accessible spaces and support the health and wellbeing of students including the provision of community and leisure facilities and open space.

## Self-contained housing

# **Design and layout**

10.5 Part of the design-led approach to delivering effective high-density housing is about ensuring the development does not compromise the size and layouts of homes, ensuring high quality homes across the scheme. CLP policy H6 and LP policy D6 requires new self-contained residential development to meet the minimum standards for internal floor areas and built-in storage space, as per the table below.

Type of dwelling		Minimum gross internal floor areas <sup>+</sup> and storage (square metres)				
Number of bedrooms (b)	Number of bed spaces (persons(p))	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage	
1b	<b>1</b> p	39 (37) *	N/A	N/A	1	
	2p	50	58	N/A	1.5	
2b	3р	61	70	N/A	2	
	4p	70	79	N/A	2	
3b	4p	74	84	90	2.5	
	5p	86	93	99	2.5	
	6р	95	102	108	2.5	

Table 8 - Minimum internal space standards (London Plan Table 3.1, Policy D6)

- 10.6 All of the 30 proposed homes meet the London Plan minimum space standards (the same as Nationally Described Space Standard) in terms of overall size and individual room sizes. Sufficient built-in storage is incorporated into each flat, including additional space for wheelchairs where applicable.
- In urban design terms, the housing block is well set back from Chalk Farm Road behind an area of public open space. The housing has a legible entrance that is visible from the street, with secure entry into both a glazed lobby and an external walkway that provides access to the ground level cycle and refuse stores. The lobby contains 2 lifts and a generous naturally lit stair. A separate second staircase is provided at the eastern end of the building. At first floor, the housing block has a dedicated access to the podium communal garden. Floors 1 to 9 contain housing in the form of flats, with 3 or 4 flats per floor accessed from an external walkway on the northern side of the block. The layouts proposed are rational and conducive to providing high quality homes.

### Outlook and privacy

10.8 In terms of outlook and privacy, all 30 homes are dual aspect, giving opportunity for good daylighting, variation of views and natural, cross

ventilation. Distances from existing nearby windows as well as other windows in the proposed development are sufficient for the homes to benefit from a good level of privacy. The building is set back behind an area of public open space and to the rear adjacent to a railway, which means that separation distances will be maintained in perpetuity.

10.9 Overlooking between balcony areas shall be mitigated by the installation of privacy screens, details of which will be secured by condition (27).

## External amenity space

10.10 LP policy D6 requires a minimum of 5sqm of private outdoor space to be provided for 1-2 person dwellings and an extra 1sqm for each additional occupant, with a minimum depth and width of 1.5m. All the proposed homes would include a compliant amount of private amenity space in the form of balconies, all of which would be south facing and away from Chalk Farm Road. Play space would be provided within the communal podium garden to supplement the private amenity space for the flats. The podium is also discussed in more detail in the 'Public open space' section of the report.

# Daylight and sunlight

- 10.11 A daylight and sunlight impact assessment has been submitted, detailing the light levels that would be received by the proposed new residential accommodation against the relevant BRE guidelines.
- 10.12 Paragraph 125 of the NPPF supports making efficient use of land and says that authorities should take a flexible approach in applying policies or guidance relating to daylight/sunlight where they would otherwise inhibit making efficient use of a site, as long as the resulting scheme would provide acceptable living standards. Paragraph 125 also states that proposals should avoid homes being built at low densities and ensure that developments should make optimal use of the potential of each site. The GLA Housing SPG recommends that "An appropriate degree of flexibility needs to be applied when using BRE Guidelines to assess the daylight and sunlight within new developments themselves. Guidelines should be applied sensitively to higher density development, especially in opportunity areas, town centres, large sites and accessible locations. This should take into account local circumstances; the need to optimise housing capacity; and scope for the character and form of an area to change over time."
- 10.13 The proposed residential accommodation within the scheme was assessed in accordance with the BRE guidelines (2022) which uses the Illuminance or Spatial Daylight Autonomy (sDA) metric. The UK National Annex provides illuminance recommendations of: 100 lux in bedrooms; 150 lux in living rooms; and 200 lux in kitchens. These target values should be exceeded over at least 50% of the room, for at least half of the daylight hours.

- 10.14 In addition, all homes have been assessed for their access to sunlight, where BRE prescribes 1.5 hours within at least one room per home.
- 10.15 In daylight terms, of the 75 habitable rooms tested, 70 would meet or exceed the BRE guidance, including 23 of the 24 living, kitchen and dining (LKD) spaces. The one LKD that would not comply is situated at first floor level and 41% of the room area would achieve the target lux value, which is a relatively minor shortfall from the 50% recommended by guidance. For the other four rooms, these are relatively small rooms located on the west elevation of the building in the same location on each of the floors from second to fifth floor level. Two are kitchens and two are bedrooms. The reason these rooms would receive relatively poorer levels of daylight is their location adjacent to the student housing building of a similar height which reduces light entering this window. Looking at the wider quality of accommodation across each of the affected flats; the two kitchens are associated with dual aspect 3-bed flats with a separate living / dining area that receive very good levels of daylight (94 - 97% room areas meeting target lux) whilst the two bedrooms are located in 1-bed dual aspect flats with generously sized living spaces that have the best possible lux rating (100% of area receiving target lux). The overall standard of accommodation is therefore good.
- 10.16 For sunlight, 18 of the 24 living rooms would receive in excess of 1.5 hours of sunlight on 21 March. The living rooms that fall short are served by windows in the middle of the building and set behind balconies, two factors which restrict the amount of sunlight that can enter the room. The balconies, however, would receive high levels of sunlight year-round, and this is affectively a trade-off between light levels and balconies providing outdoor space.
- All 18 rooms would receive more than 4 hours of sunlight on 21 March which is considered high exposure and potentially at risk of overheating. The overheating assessment shows that in current weather conditions, all rooms would pass CIBSE TM59 (technical basis referenced in LP policy SI 4 for residential developments), when using passive measures alone and openable windows, and with windows closed (for acoustic reasons) and addition of MVHR with tempered air (TMVHR). TMVHR is accepted but subject to the condition that it will only be activated when the internal temperature exceeds 22°C.

### Quality of student accommodation

10.18 The purpose-built student accommodation (PBSA) would comprise a range of flat layouts including 24 cluster rooms with shared facilities (affordable provision), 171 private studio rooms and 69 large studio rooms (includes 11% wheelchair accessible bedrooms).



Figure 3 - room layouts of PBSA. L: Cluster rooms (affordable) R: Studio rooms

10.19 The PBSA is entered through a communal lobby directly on to Chalk Farm Road. The ground floor contains communal amenities for the residents including a cycle store, workspaces, dining room, laundry and a gym. From here, residents enter one of the two cores to access the study rooms on upper floors. The south-western of these cores also provides access to a large south-facing communal external amenity space. Upper floors contain groups of bedrooms along corridors, predominantly made up of studios (containing ensuite bathrooms alongside kitchenette, study and sleeping spaces) and some cluster rooms (containing ensuite bathrooms, study and sleeping spaces) with shared communal kitchens. Due to the shape of the buildings, the orientation of the accommodation varies with either 1, 2 or occasionally 3 windows to each room. No dual aspect units are proposed but this is not a policy requirement for student accommodation and would be very challenging to achieve for a high-density development comprising small unit sizes. Rooms and windows in the centre of the plan where there are close proximities have been offset from those opposite as far as possible to reduce overlooking and maximise outlook. The image below in Figure 4 shows the relationship between those central units.



Figure 4 - Floorplan layout for PBSA

- There is no policy requirement for private amenity space, but the residents would have access to a student only communal terrace on the 6th floor as well as the podium garden shared with the housing occupiers, helping to establish a mixed community.
- In daylight terms, only 53 of the 272 rooms assessed (19%) would not achieve a BRE compliant target value of 150 lux (established by the Planning Inspectorate as an appropriate target for student rooms and apartments). Of these 53 rooms, 28 would have very poor daylight with less than 10% of the room area achieving the target lux value. The rooms receiving the lowest levels of daylight are located in the 'knuckle' of the building on inward facing elevations where light is blocked by adjacent massing. Taking the student housing as a whole, there is a relatively small level of non-compliance. All students would have access to rooftop and podium amenity spaces which have very good levels of daylight, as well as communal rooms at ground floor level. It is also possible to arrange the room so that the study area is located closest to the window.
- 10.22 For sunlight exposure, 101 of the 146 rooms (69%) (served by at least one window orientated 90 degrees of due south) would comply with the BRE guidelines. Where the target is not met, these are to rooms served by windows facing predominantly east or west where sunlight is more restricted.
- 10.23 Whilst the starting point for quality of student accommodation is always to achieve the best possible, it has to be recognised that the student population is transient students will occupy their rooms for a relatively short period of

time and for most, only during term time. Nonetheless, the standard of accommodation is acceptable on balance, especially taking into account the impacts largely arising from the bold and innovative design (see Urban Design section).

#### Accessible homes

- 10.24 Local Plan Policy H6 seeks 90% of new-build homes to satisfy Building Regulations Part M4(2) (accessible and adaptable) and 10% of new-build homes to satisfy Building Regulations Part M4(3) (wheelchair accessible, or easily adaptable for residents who are wheelchair users). Within the latter category, 10% of new-build homes for social-affordable rent should be fully adapted to be wheelchair accessible to satisfy Building Regulations Part M4(3)(2)(b).
- The Housing CPG (para 3.38/ Figure 1) indicates that we will particularly seek wheelchair user dwellings in the social-affordable rented sector in the form of 2-bedroom 4-person homes and 3-bedroom 5-person homes or 3-bedroom 6-person homes. This is to better provide for families with a child who is a wheelchair user, since wheelchair users find it easier to occupy double-bedrooms.
- 10.26 In this case, 3 out of the 30 homes would be wheelchair accessible (M4(3)(2)(b)) which is policy compliant. All are in the Social Affordable Rent tenure and are located on the lower levels (2<sup>nd</sup> and 3<sup>rd</sup> floors) which is welcomed.
- 10.27 The wheelchair accessible homes sizes and bedspaces/occupancy (1 x 2 bed 3 person and 2 x 3 bed 4 person) are not the preferred type as there is only one double bedroom in each. Nevertheless, there are households on the General Needs Housing Register for which these flat sizes would meet a need and so the offer is considered to be acceptable. A condition is attached to ensure compliance with M4(2) and M4(3)(2)(b) (condition 47).
- 10.28 For the student housing, the Mayor's Wheelchair Accessible and Adaptable Student Accommodation Practice Note (2022) requires either 10% of new bedrooms to be wheelchair accessible or 15% of new bedrooms to be accessible. Of the 264 units proposed, 29 would be wheelchair accessible which is 11%. In response to consultation feedback, which highlighted that many of the units with the most limited outlook and daylighting were wheelchair accessible units, the scheme has been amended to more evenly distribute these units across the plan providing a range of layouts and orientation. The wheelchair units that would remain in the centre of the plan would benefit from two windows with the windows furthest away from the centre providing longer views. These would also be secured by condition (condition 46).

- 10.29 Slightly exceeding the policy requirement, the amount of accessible housing delivered by the scheme could have a notable positive impact on disabled students and residents and older residents with limited mobility (disability and age being protected characteristics see note at the front of the committee pack on the Public Sector Equality Duty).
- 10.30 The wheelchair accessible units for the PBSA are available at full market rent only but it is understood that if there is a disabled student who qualifies for affordable accommodation, then their Higher Education Institution would assist in finding them specialist affordable accommodation within its existing portfolio or network of nominations agreements. The applicant has agreed to seek nominations agreements for up to 135 of the PBSA units which would include an element of the market accommodation, helping to ensure appropriate allocation of accessible units.

#### Noise and vibration

- 10.31 The new homes and student accommodation are in a busy town centre, so there would be the potential for some noise and disturbance. Camden Town is known for its night-time activities, and the agent of change principle means it is important to ensure the protection of the ongoing operation of the Roundhouse next to the site, as well as other night-time economy uses in the area. As such adequate noise insulation and management will be needed to comply with the agent of change principle as emphasised in the draft site allocation, LP policy D13, and CLP policies A1 and A4, subject to conditions.
- 10.32 Noise from plant within and on top of buildings would be conditioned in terms of noise levels, and there would be a requirement for anti-vibration mounts (conditions 39 and 40).
- 10.33 There is also a condition to ensure robust noise insulation in the new buildings. This would help protect future residential occupiers from external noise sources, like those coming from general nighttime uses nearby, and the traffic from the busy roads and rail lines (condition 20).
- 10.34 The nature of noise from music venues is often different, with bass frequencies carrying into homes. As a result, detailed information will be required to show how the residential accommodation will be protected against those frequencies too. Condition 20 secures these details, and also requires compliance with a minimum standard to protect against those frequencies.
- Mechanical ventilation and heat recovery (MVHR) will be used throughout the development to remove excess heat without relying on the use of openable windows, which would otherwise result in high internal noise levels. Although there would still be openable windows under occupant control for purge ventilation, this would allow occupants to keep windows shut during

noisier periods, making full use of the above noise mitigation while still allowing a comfortable internal climate.

- 10.36 This would help to limit any impact on the established nighttime uses and music venues nearby particularly the Roundhouse in line with the Agent of Change principle. Limiting the new accommodation's susceptibility to noise nuisance will reduce the chance of complaints against the existing venues, helping to safeguard their continued importance contribution to the local character and economy.
- 10.37 A rail line runs close to the site, directly to the south, with a tube line running underneath the site 13m below ground. The design of the building's structure will also need to mitigate any vibration from the rail line and tunnel, and a condition has been recommended that would minimise vibration to acceptable levels (condition 20).
- 10.38 The new residential uses will be constructed to a high standard that would ensure that the new occupiers are not unduly impacted by noise from inside the block, or outside the building, in accordance with the development plan.

## Quality of proposed housing - conclusion

- 10.39 The proposed self-contained housing is considered to provide a good overall standard of accommodation and level of amenity. All homes would meet space standards and be dual aspect and the vast majority would provide compliant internal daylight and sunlight levels. They would provide accessible homes for all, including provision of three wheelchair homes, allowing the buildings to house an inclusive community that can use them safely, easily and with dignity.
- 10.40 The student accommodation overall would provide a good standard of accommodation, though there are incidences where units in the centre of the plan would receive a more limited standard of accommodation than desirable. To mitigate the impact, larger studios have been placed in the centre as they have 2 or 3 windows which means more opportunity for enabling the unit to achieve a better standard of outlook and daylighting. Furthermore, the positioning of windows has responded to those adjacent to ensure privacy is maintained as far as possible. The noise impacts of the development, and its neighbours, would be carefully managed to ensure occupants are not exposed to unreasonable noise levels. There are 29 wheelchair accessible units proposed in the student accommodation which exceeds the target of 10%. The quality of these have been improved through design revisions and offers a balanced mix of accessible accommodation.

# 11. IMPACT ON NEIGHBOURING AMENITY

11.1 CLP policies A1 and A4 and the Amenity CPG are all relevant with regards to the impact on the amenity of residential properties in the area, requiring

careful consideration of the impacts of development on light, outlook, privacy and noise. Impacts from construction works are also relevant but dealt with in the 'Transport' section. The thrust of the policies is that the quality of life of residents should be protected and development which causes an unacceptable level of harm to amenity should be refused.

- 11.2 LP policy D9 on tall buildings says that daylight and sunlight conditions in the neighbourhood must be carefully considered.
- 11.3 The site has residential properties located opposite the site on the north side of Chalk Farm Road as well as to its south at Juniper Crescent over the railway line. The residential properties that have been assessed for amenity impact and their relationship to the site can be seen below.
  - Juniper Crescent Estate;
  - 2. The Chalk House;
  - 3. 71 Chalk Farm Road;
  - 4. 67-70 Chalk Farm Road;
  - 5. 65-66 Chalk Farm Road;
  - 6. The Juniper Building.



Figure 5 - Site and residential neighbours likely to be impacted

## Daylight, sunlight and aspect

- The leading industry guidelines on daylight and sunlight are published by the Building Research Establishment in BR209 'Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice' (third edition, 2022) (BRE). The development plan supports the use of the BRE guidance for assessment purposes, however, it also cautions that it should not be applied rigidly and should be used to quantify and understand impact when making a balanced judgement.
- 11.5 Paragraph 125 of the NPPF supports making efficient use of land and says that authorities should take a flexible approach in applying policies or guidance relating to daylight/sunlight where they would otherwise inhibit making efficient use of a site, as long as the resulting scheme would provide acceptable living standards.

- A daylight and sunlight impact assessment has been submitted with the application which uses BRE endorsed methodology to assess the effects on existing surrounding properties, including daylight (the two-part assessment of VSC and NSL) and sunlight (the two-part assessment of APSH annually and in winter) to buildings and sun-on-ground to amenity spaces. The methodology and criteria used for the assessment are based on the approach set out by BRE guidance. The report makes use of several metrics 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 NSL figure can be reduced by up to 20% before the daylight loss is noticeable (i.e. retain 0.8 times its existing value).
  - Annual Probable Sunlight Hour (APSH) A measure of the amount of sunlight that windows 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.
- 11.7 The BRE guidance targets are based on a model which is meant to apply broadly across the whole country, so it does not tend to account for much denser urban settings like London or Growth Areas. As a result, it recommends setting alternative targets which take account of relevant local context.

## 11.8 The London Plan Housing SPG states:

The degree of harm on adjacent properties and the daylight targets within a proposed scheme should be assessed drawing on broadly comparable residential typologies within the area and of a similar nature across London. Decision makers should recognise that fully optimising housing potential on large sites may necessitate standards which depart from those presently experienced, but which still achieve satisfactory levels of residential amenity and avoid unacceptable harm.

- In this context, a well-connected centre where growth is expected to be directed, alternative targets of retained VSC levels of around 18% can be considered acceptable, as can retained NSL of around 50%. These are commonly applied targets in other schemes in Camden and dense environments. For example, the existing building on site is just over 20m tall and the street here is around 20m wide, giving a 1.0 (1:1) street width to building height ratio. Space-to-height ratios of 1.0 to 1.4 (and indeed lower) are common in the area, including on Crogsland Road, Belmont Street, and Ferdinand Street opposite the site. The BRE guidance suggests equivalent VSCs ranging from 15% for a ratio of 1.0, to 21% for ratios of 1.4. As such, an alternative target of 18% is appropriate for this context.
- 11.10 An assessment has also been carried out that analyses the cumulative impact of the proposed development together with the new building approved for the Petrol Filling Station, part of the Camden Goods Yard development (ref. 2017/3847/P as amended by ref. 2022/3646/P) which is not yet under construction. The results are reported as part of the assessment.
- 11.11 The revisions were reviewed by the applicant's DSL consultants who concluded that due to their scale and nature, the results set out in the report originally submitted would not be materially affected.

## Juniper Crescent Estate

11.12 Juniper Crescent is a housing estate located to the south of the site over the railway line and comprises a mixture of flats and houses.



Figure 6 - Juniper Crescent Estate (south of the site)

11.13 It is noted from the outset that plans are underway to redevelop the Juniper Crescent Estate following a residents' ballot. The layout and form of the estate is expected to change significantly if redevelopment proposals come forward.

- 11.14 Across the estate, 41 windows have been assessed in total associated with Nos. 24-64 Juniper Crescent. The other windows do not require assessment as they comply with the 25 degree line test or are facing away from the site. Of those assessed, 21 of the 41 windows would comply with BRE guidelines. The impact on the remaining 20 windows will be now be considered in more detail.
- 11.15 At Nos. 34-44 (16 windows) and 54-64 (16 windows) Juniper Crescent, which are all flats, those windows that fall short of the BRE guidance all serve kitchens, with each kitchen having two windows. The lowest retained VSC would be 22.07% which, whilst not achieving the 27% recommended by BRE guidance, is still considered to be a good VSC level for an urban area and more than the alternative target of 18%. All windows meet the NSL test which demonstrates the daylight distribution for each room is good.
- 11.16 At 45-53 Juniper Crescent (9 windows), a terrace of three-storey townhouses, the daylight loss ranges from 34-47% (over 20% is considered 'noticeable' by BRE guidance). The most impacted window is at ground floor level and would have a retained VSC of 18.40% (compared to an existing VSC of 33.97% which is very good), which again exceeds the alternative 18% target. In terms of daylight distribution (NSL), there would be deviations from the BRE guidance for seven rooms, with losses up to 65% of former value which reflects a room that currently has 89% of its area lit being reduced to 31% lit. The windows that do not meet the BRE guidance are the rear windows of three storey townhouse properties which will continue to have uninterrupted aspect to the front at ground, first and second floor levels. When considering the standard of accommodation as a whole, the impact on the windows facing the site is considered acceptable.
- 11.17 In terms of the cumulative impact, the proposed development together with the PFS building would not materially affect the daylight to kitchens at 34-44 Juniper Crescent. At 54-64 Juniper Crescent, the ground floor windows would retain VSC levels of between 16.50% and 16.72% (compared to approx. 22% VSC in the proposed development only scenario) and at 45-53 Juniper Crescent, retained VSC would be between 16.29% and 21.17%.
- 11.18 As the development is located to the north of the site, sunlight amenity would not be affected by the proposed development. As such the impact on the estate is considered moderate and acceptable.

### The Chalk House

11.19 The Chalk House is a four-storey building to the north of the site containing ground floor retail with residential above.



Figure 7 - The Chalk House (north of the site)

- 11.20 In terms of daylight, 21 of the 33 windows would comply with BRE guidelines. The 12 windows that do not meet the guidance serve 3 windows at second floor level positioned behind inset balconies and 9 windows at third floor level beneath a brise soleil.
- 11.21 The second-floor windows that would not meet the BRE guidance serve living rooms and already have relatively low VSC levels (11.39% 14.08%) that would be reduced by between 26% 34% with the lowest retained VSC being 7.46%. None of the third-floor windows, a combination of living / dining rooms and bedrooms, would meet the BRE guidance with losses of between 21% and 31% and retained VSC levels of between 12.03% and 16.63%.
- 11.22 However, at second floor level, the windows are set back behind balconies which inevitably restricts the amount of natural light that can reach the window. At third level, there is a continuous deep brise soleil that runs above all window to provide shading for the south-facing large windows. It is important to note that all adjacent bedroom windows at second floor level and all windows at first floor level, none of which are set behind a balcony or brise soleil, comply with the BRE guidance. The impact at this level is at its greatest 14% (compared to 20%+ which would result in non-compliance with BRE guidance) whilst the retained VSC ranged between 21-26% which is considered good for an urban setting and more than the 18% alternative target.
- 11.23 The BRE provides guidance for windows that are located below balconies or recessed into the building, to establish whether the existing obstruction, or the proposed development, is the main factor in the loss. It explains that when light is cut out from the top part of the sky, even a modest obstruction

may result in a large relative impact on the VSC. It suggests that an additional VSC calculation is carried out for both existing and proposed situations, without the balcony in place

- 11.24 Accordingly, supplementary analysis has been carried out and shows that without the balconies in place, all windows would retain a VSC of at least 24% (which is good for an urban environment, and the most impacted window would have a retained ratio of 0.82 (retained VSC of 26%). Therefore, in the without obstruction scenario, all windows comply with BRE guidance.
- In terms of sunlight, all windows apart from the three recessed second floor living room windows would comply with the BRE guidelines for both annual and winter sunlight. The three windows that fall short would retain 0.67, 0.73 and 0.79 times their existing annual sunlight hours (where 1 is no impact) and 0.27, 0.46 and 0.60 times their existing winter sunlight hours compared to the 0.8 times the existing value recommended by BRE. Like with daylight, further analysis has been carried out to analyse the impact on the windows if they were not recessed behind balconies and the exercise demonstrates that the windows would retain between 65%-71% APSH compared to the BRE recommended 25%.
- 11.26 The cumulative effect would not materially change the daylight and sunlight received to these windows.

## 71 Chalk Farm Road

11.27 Located to the north of the site, the site includes a second-floor residential unit with two windows facing the site (circled red).



Figure 8 - 71 Chalk Farm Road (north of the site)

- 11.28 VOA records indicate that that there is a flat at second floor level, though no floor plans have been sourced. The analysis demonstrates compliance with BRE guidance using the VSC methodology and a deviation when using the NSL test with the room retaining direct skylight to 70% of the room area, slightly below the recommended 80%. The impact is not considered to be harmful.
- 11.29 In terms of sunlight, both windows would comply with the BRE guidelines for both annual and winter sunlight.

### 67-70 Chalk Farm Road

11.30 Located to the north of the site, this address comprises 9 flats in total, 3 at each level (first, second and third floor). The obtainable floor plans show living rooms and bedrooms facing the site. Some information from objectors suggests that layouts may have altered so there are in fact living spaces instead of bedrooms.



Figure 9 - 67-70 Chalk Farm Road (north of the site)

11.31 Nonetheless, even assuming primary living accommodation in those spaces, the analysis shows that all but one window would experience transgressions from BRE guidance. The affected windows at first floor level would retain between 20.16% and 23.40% VSC with higher retained VSC at levels above which is between 0.72 and 0.77 times the existing condition (compared to a recommended 0.8 in BRE guidance). This also exceeds the alternative 18% VSC target. The level of retained VCS across the windows is therefore considered to be consistent with its urban context.

- 11.32 Five of the 15 rooms assessed would comply with BRE guidelines using the NSL test. The 10 rooms that would not comply would retain direct skylight to between 48% and 77% of each room area, the equivalent of between 23% and 49% loss (compared to the 20% loss provided by BRE) but close to or greater than the 50% alternative target which is a reasonable daylight distribution. This is a result of the windows currently benefiting from an unobstructed view as they are located opposite the car park entrance where there is no existing built form and therefore any development is going to have a disproportionate impact.
- 11.33 In terms of sunlight, all windows would comply with the BRE guidelines for both annual and winter sunlight.

### 65-66 Chalk Farm Road

11.34 Located to the north of the site, this address contains 11 residential windows serving living rooms, kitchens and bedrooms at first to third floor levels.



Figure 10 - 65-66 Chalk Farm Road (north of the site)

- The analysis shows that all windows would comply with the BRE guidelines using the VSC test and 7 out of 8 rooms would comply using the NSL test. The one room that deviates from the NSL test would retains 76% of its existing daylight which is only a minor shortfall compared to the 80% provided by BRE guidance.
- 11.36 In terms of sunlight, all windows would comply with the BRE guidelines for both annual and winter sunlight.
- 11.37 Given the site's location nearer to the PFS site, the cumulative scenario does reflect transgressions to 6 windows in VSC terms, retaining between 70 –

78% of daylight which is considered a minor transgression from the 80% BRE recommendation. The lowest retained VSC would be 13.8% reduced from 18.27%. This is less than what would be generally sought but is considered to be an isolated incidence caused by the joint effect of two close developments. Other windows on the building would retain VSC levels in excess of 16% which is closer to the level expected in an environment such as this. As a whole the development would have a moderate but acceptable impact on light to neighbours.

## **Privacy**

- 11.38 The proposed development has more windows compared to the existing building and there are concerns about overlooking from those who live on the opposite side of Chalk Farm Road particularly from residents of The Chalk House. The concerns are also likely to be linked to the more active land use of the proposed development with student accommodation being occupied around the clock compared to a more limited daytime use typically associated by office use (and more recently artists' studios).
- The closest separation exists between the windows on the north drum of the PBSA and The Chalk House (no. 74-77 Chalk Farm Road) which is 20m and a similar separation distance of 21m would exist between the east drum and 72 Chalk Farm Road. These comfortably exceed the 'good practice' distance of 18m stipulated in CPG Amenity and is consistent with the existing separation distance. Whilst there would be more windows in the proposed scenario compared to the existing situation, it is expected that the number of windows with direct views would be similar to the current situation, given that windows at levels above the existing buildings would not be able to obtain direct views. The drum-shaped form of the buildings would also soften the impact as it adjusts the orientation of the proposed windows, limiting direct views as well as increasing separation distances as the building curves away.
- 11.40 In terms of views to Juniper Crescent over the railway, the separation distance between the closest existing windows and the west drum and the affordable housing building is approx. 24m which is comfortable.
- 11.41 The overlooking impact, whilst perhaps felt more by neighbours due to the proposed use of the building, would be mitigated by the separation distance, the design and form of the building and would not result in a harmful impact on privacy.

#### Noise

The uses are appropriate for the town centre location, with new residential, commercial, and student accommodation. There is an existing level of noise and disturbance in this busy Town Centre, and the introduction of these new uses is not expected to contribute significantly towards this. The activity

arising from the student housing would be managed by a Student Management Plan and the robust noise insulation to protect future occupiers would also prevent noise outbreak from affecting neighbours.

- 11.43 The proposal includes installation of plant equipment, and this is designed to be inside the building or within the proposed plant enclosures on the roof of the buildings, mitigating any noise and vibration from the plant. Furthermore, the council's noise officer has supported the application, recommending noise from plant within and on top of buildings be conditioned in terms of noise levels and vibration mounts (conditions 39 and 40).
- 11.44 Given suitable facade design specification and mechanical plant noise level criteria, officers are satisfied that the submitted acoustic submissions meets local plan guidelines and would protect neighbouring occupants from harmful noise in accordance with CLP policies A1 and A4.

#### 12. URBAN DESIGN

12.1 Camden Local Plan policies D1, D2 and CPG (Design) are relevant to the consideration of design when assessing planning applications. LP Policies D3, D4, D5, D8, and D9 are also relevant.

#### Site and Context

- The 0.28ha site is located on the south side of Chalk Farm Road (A502), north of the railway, with the Roundhouse to the west and a temporary Morrisons store with associated parking to the east. The site has an irregular shape, with a curved western boundary to the side of the Roundhouse and stepped boundary to the east. It lies within the Regent's Canal Conservation Area, to which the existing building on site is a neutral contributor, whilst the neighbouring Roundhouse is Grade II\*. The site sits within the Camden Goods Yard Planning Framework (2017) area and is also included as a draft site allocation.
- 12.3 The site is currently occupied by 3 vacant commercial buildings, the tallest of which is the main six-storey (approx. 20m height) office building fronting Chalk Farm Road with a 33m length elevation. A three-storey office building sits to the rear, with a two-storey link building which adjoins the Roundhouse. There are surface and subterranean (cut into the slope of the site) car parks at the rear. An area of dense vegetation is located in the southeast corner of the site where the site boundary interlocks with the eastern neighbour. Along the northern boundary to Chalk Farm Road, a 3.1-3.5m high wall runs continuously for 40m on the pavement edge. The pavement is a width of 3.5m 4m, with existing tree pits and a bus stop located within this zone.
- To the east of the site, a recently approved (2022/3646/P) 8 storey office building as part of the Camden Goods Yard development will replace the

- temporary Morrisons store. This features a 64m long elevation of 25m height to the street, with a set back top floor of a further 4m in height.
- The northern side of Chalk Farm Road is of a lower scale with mixed use buildings of 1 to 4 storeys, generally featuring public uses at ground floor.

#### Form and Mass

- The proposal is for two buildings, one of which comprises three cylindrical forms connected at ground floor level, ranging between 6 and 12 storeys. Given the context, the proposal is therefore considered to contain tall buildings as per definition within Camden Local Plan paragraph 7.35.
- The scale of the new buildings (between 22-40m) is a notable increase to those currently on site, which are approximately 20m tall and that consented on the neighbouring site, which is 29m. This increase in scale has required an exceptional architectural response to ensure that the proposal has a successful relationship with its context. The contextually led design has informed a unique response to the context, with the accommodation broken up into a family of buildings across the site. These buildings share a common language, but vary in footprint, height and have subtle differences in their external appearance.
- 12.8 The proposals have curved plan forms, with the three interconnected buildings shaped as cylinders rising from a curved base that forms a sinuous edge to the street. The standalone housing building to the east of the site is curved on its western edge, and north-eastern corner with flat elevations to the north and to the east where it will have a party wall with future neighbouring development, and to the south over the railway. It is noted that some objectors have raised concern about the plan form of the proposed buildings. The use of primarily cylindrical forms is a contextual response to the strong plan form of the Roundhouse and further derived from analysis of the buildings within, or in close proximity to, the Regents Canal Conservation Area including the Roving Bridge over Grand Union Canal, the former Piano Factory on Oval Road and the Gasholders within Kings Cross Central. The composition of the proposed buildings was inspired by Axel Towers in Copenhagen that are sited neighbouring a similar structure to the Roundhouse.
- The student housing cylinders are 6 storeys (22m) to the north, 9 storeys (31m) to the centre and 12 storeys (40m) to the west. The affordable housing building is 11 storeys (36m). The lower building is close to the existing back of the pavement in a similar position to the existing building on site, the 9 storey building is set back by 1.5m, the 12 storey building is over 16m away and the 10 storey affordable housing is 18m away from the street. The set-backs from the pavement provide a significant uplift in public space compared to the current condition. Whilst the existing high blank wall along

the Chalk Farm Road frontage references the former Camden Wall (original parts of which still exist further along the street), and in this sense reflect the historical industrial character and barrier, this is a negative interaction with the street in terms of streetscape, active frontages, passive surveillance and public realm. The proposed set backs in the proposal allow relief and a much improved sense of connection with the street, with materiality still referencing the wall (see below).

- 12.10 Despite the increase in scale of the new buildings on the site, the impact of this height on the public realm is balanced by the softer forms and the limited direct proximity that the curved frontage provides. By breaking up the form and stepping the buildings in by varying distances from the street, the potential impact on the context is reduced and an excessive sense of enclosure avoided.
- 12.11 The uses within the buildings have informed their location within the site. Three cylinders of student accommodation located to the north, west and centre of the site are sat above a base of commercial and student accommodation common areas, closest to the Roundhouse. An affordable housing block is located in the southeast of the site, where it is narrowest so as to benefit from maximising dual aspect homes and furthest from potential disruption of the Roundhouse.

## Local Views

- 12.12 Due to the scale of the development, the proposals will be visible from a wider set of viewpoints than the existing buildings on site. Within the application, representative views from these areas have been provided, illustrating the impact of the proposals on the existing view whilst also demonstrating how these fit with other local consented schemes.
- 12.13 The views are broadly grouped into; those from Haverstock Hill in the northwest, those along Chalk Farm Road from the east, those from Belmont Street to the north and those from parts of Primrose Hill to the south and southwest.
- In views from the west, the proposals sit behind the Roundhouse with their cylindrical forms complementing its conical roof. The silhouette of the Roundhouse roof is no longer pronounced against the sky in these views due to the neighbouring Camden Goods Yard development sitting further behind in the distance. The tallest of the cylindrical buildings is closest to the Roundhouse, extending well above its roof so that there is a clear distinction between the two buildings. This approach to location of the tallest building was endorsed by the Camden Design Review Panel. Within closer views from Haverstock Hill, the newly constructed Roundhouse developments obscure much of the building whilst the crowning top floors of the proposals match the remaining visible parts of the Roundhouse roof.

In views from the east along Chalk Farm Road, the proposals present a dramatic increase in scale particularly as a result of the taller buildings that are sat towards the rear of the site. These taller buildings will in fact be screened by the neighbouring consented scheme in the foreground that is of a comparable height to the proposed lower buildings on the street edge. With this context, the proposed scheme achieves an enhancement to the approach by stepping slightly further from the Roundhouse with complementary forms and the improvements to the streetscape. Furthermore, the existing building blocks views of the Roundhouse from Chalk Farm Road (see below) and the proposal to move the buildings back in the plot will help to better reveal the Roundhouse in an approach from the east, particularly in closer views.



Figure 11 - Existing view from Chalk Farm Road (from the east)

- Views from the north demonstrate the height increase on the site. From this direction, it is evident of the importance of the architectural approach in achieving a successful integration with the context. The layered arrangement, with taller buildings further from the public realm allows the lower buildings in the foreground to provide the step in scale, whilst partially screening those behind. The buildings each read separately, giving an elegance to their proportion, so that although taller than the context, they are comparable in their scale. The curving forms complement the Roundhouse footprint, and the use of high-quality materials and detailing presents an excellence in design that is fitting of its size and location, referencing the area's industrial heritage.
- 12.17 Parts of the development are visible from Primrose Hill across the railway lines, generally over the top of the housing at Juniper Crescent which is

currently open to the sky. These views are at a distance of at least 200m from the development. From this distance, the broken cylindrical structures and tonal materiality contribute towards the development forming a comfortable relationship with the Roundhouse.

## Integration with Context and Landscape

- 12.18 Due to the shape of the site, there are differing conditions on each of the site edges. To the west, the site meets the curving cylindrical edge of the Roundhouse. The existing building on site adjoins the Roundhouse and visually shields the building as approached from the east. On the northern edge of the site to Chalk Farm Road, the existing condition is a wall directly on the back of the pavement that is devoid of openings or offering activity to the street. Within the interlocked form of the eastern boundary, the existing car parking will be developed into an open space (proposed to be youth-orientated public space) as part of the neighbouring PFS development.
- 12.19 The proposal at the western end will improve the relationship with the Roundhouse by achieving a clearer delineation between the two buildings, exposing more of the Roundhouse wall so that the Grade II\* listed building will read as a more independent form. The lower northern cylinder, with its rounded profile creates a more complementary relationship to the Roundhouse and increases visibility from the east. To the north, the condition of the street will be transformed with an increased width to the public realm complemented by entrances and windows which activate the street. This addition of 336sqm of public realm adjoins the consented youth space, which will be activated on its southern edge with overlooking from the new homes. This accords with objectives of the Camden Goods Yard Framework which encourage enhancing the setting of the Roundhouse through the creation of an enhanced public realm and widening of pavements. To the railway edge, a large outdoor amenity space is proposed to be shared by residents and students. This will include play areas for 0-4 and 5-11 year olds. At other levels (courtyard garden and roof terrace), 260sqm of outdoor amenity is provided for students.

#### **Details and Materials**

- 12.20 The details and materials proposed for the development are intrinsically linked to the assessment of this as a high-quality design that is suitable for this prominent and sensitive site. Materials and details for the proposal have been selected to reflect those found locally and further for their sustainable credentials.
- 12.21 The base of the development is a masonry plinth that wraps around the buildings. It is designed to appear as a solid, crafted, hand-laid base with piers that reflects the existing (non-original) wall which borders the site and the distinctive historic masonry found to the east within the Conservation Area, often referred to as the Camden Wall. The openings in the proposed

wall or plinth are articulated with corbelled brickwork to accentuate the depth of the construction, adding interest that reflects local character. Seating is incorporated into the base of some of the street-facing windows to provide areas of rest. To the top of the brick base, the brickwork corbels outwards to provide a stronger ledge from which the upper lightweight volumes are supported. This wider band accentuates the circular form and produces a capping to the brickwork that interprets local parapet features.

- 12.22 A more lightweight, component-based architecture is found above, constructed of fluted terracotta held within a veil of vertical and horizontal aluminium fins. The scale of the metal fins is akin to those of metal trussed roofs of key buildings in the area and the secondary infrastructural elements that are mounted to the brickwork which is a prevailing detail within the CA. The metal façade is composed of deeply projecting curved horizontal bands at each floor, with a double band every third floor that also incorporate a rotation of the geometry of the vertical fins. This gives a dynamism to the form with visual interest, whilst the curved shape of the band accentuates the cylindrical form. Fluted terracotta panels sit behind vertical fins, bringing variation to the building's skin at a more intimate scale through their manipulation of light and shadow. The use of terracotta gives a rich and changeable surface to the building that will alter with varying daylight. The colouring of the terracotta has been selected to reflect the tones of materials found locally. Three slightly different colours are proposed, which vary between the buildings to provide further differentiation between them. The scalloped fluting of the surface brings a delicacy to the material as the concave curve will naturally display tonal difference whilst providing a rhythm to the façade that assists with breaking down the buildings scale.
- 12.23 Window openings with slim metal frames within the PBSA buildings are simple and arranged to fit within the rhythm of the façade. These are practically sized to suit the rooms behind, with cill levels that facilitate flexibility of the furnishing and opening casements for natural ventilation. The window sizes provide a balance between providing good daylighting and mitigating the risk of overheating. The scale of the window has been slightly exaggerated through an angled head detail and a tighter rhythm to the terracotta fluting above. This detailing helps to further lighten the form, whilst the variation to the terracotta provides additional subtle visual interest. The buildings are each topped with a filigree 'crown' that intends to dematerialise the top of the buildings and are formed of the façade materials and geometry from below. These areas contain amenity space and plant areas, so that they are integrated within the architecture.
- 12.24 The affordable housing block shares many of the characteristics of the PBSA, however has additional materials and details as necessary to provide high quality housing. The housing includes communal access decks to the north and private balconies to the south. These include a framing of vertical

fins to the front edge, continuing the language from the rounded sections which provide some enclosure to the open areas. To the rear surface of the decks and balconies, white brickwork will help to reflect light whilst providing a durable material that will age well.



Figure 12 - bay study of affordable housing building

12.25 The applicant has provided a number of bay studies and detailed drawings within the application that illustrate the above, providing clarity on the level of detailed and material quality that will be delivered. The level of detailed articulation and high-quality materials shown in these drawings are essential to the development achieving a satisfactory integration within the context.

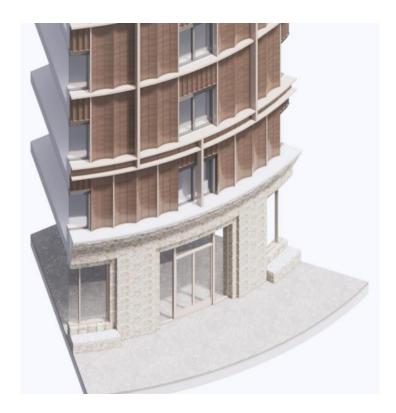


Figure 13 - bay study of PBSA

12.26 In addition to details of materials and details, further information on the signage and lighting strategies will be secured to ensure it complements the overall architecture and does not introduce unnecessary visual clutter and in regards to lighting, promotes safety whilst avoiding harmful light spill (Condition 28 and 29).

### Re-use and Adaption

- As required by Policy CC1e. the applicant has followed due process in assessing the potential of the existing building as opposed to the demolition and new-build approach proposed within the application. Within these studies, 2 options have explored the retention and extension of the existing site buildings with some in-fill development. Due to the location and form of the existing buildings, limited development is possible before the extension and in-fill has a significant detrimental impact on the surrounding context. The resultant layouts also include highly compromised rooms that would lack good aspect, with a ground floor that doesn't address the street successfully. To achieve the best outcome for the context whilst optimising the site capacity and delivering high quality living accommodation, it is agreed that a new-build approach is preferable. Further discussion on why this is a supported approach is provided in 'Energy and Sustainability' section of report.
- 12.28 To ensure that future adaption of the proposals are possible, in accordance with LP Policy D1c and D1d, the application illustrates how the PBSA could be converted into C3 residential dwellings (subject to planning). The floor

heights within the application allow for conversion whilst meeting standards of internal ceiling levels. This would deliver high quality homes, achieving 7 homes on a typical floor and 62 total across the PBSA buildings.

## Design Review Panel

- During the pre-application process, the project was reviewed twice by the Camden Design Review Panel, firstly on the 25<sup>th</sup> August 2023 and more recently on 12<sup>th</sup> January 2024. Officers are satisfied that the applicant had made changes to the scheme which have adequately addressed any issues raised.
- 12.30 A summary of the key points from their feedback and any subsequent associated amandments to the proposal is included below:

The panel is pleased by changes made in response to its previous comments. It supports the decision to move the tallest building to the south side of the site and to separate the buildings from one another. The panel thought that the proposed heights can be acceptable close to the listed Roundhouse, but only if their architecture and materials are of the exceptional quality required in a sensitive heritage setting.

12.31 This has been addressed within the application, and assessed within the design observations above. Officers considered that the archiecture and materials are of exceptional quality and fitting for this setting.

Although the tallest building on Chalk Farm Road has been lowered, the panel thinks that lowering the nine-storey block further would reduce public realm impact.

Whilst the DRP comments on this point are noted, in discussion with officers, the applicant has retained the 9-storey height. As set out within observations above, it is considered that this height is comfortable due to the location, form and architectural design of this building. The proposed height of 31m is similar to the 29m height of the neighbouring consent. Instead of reducing the scale, the impact on the public realm is mitigated by a softened form which curves away from the pavement. The building is set-back from the pavement edge with integrated seating positively contributing to the public realm.

The architecture is progressing well, but the panel makes suggestions for refinement including simplifying materials by removing aluminium, and introducing greater tonal range.

12.33 This has been addressed within the application, with use of aluminium has been reduced as far as possible and changes have been made to include further variation and interest to the terracotta parts of the façade.

To maintain the quality required in a sensitive setting, it is essential that the designs are delivered to the standard presented, and that value engineering does not reduce their quality. Design detail should be included in a planning application, including bay studies, to give Camden Council greater assurance.

12.34 These studies have been included within the application and assessed within design observations above. Further detail on all architectural detail and facing materials will be secured by condition. A s106 clause will ensure the scheme architect (DSDHA) is retained throughout the project.

The affordable housing entrance is hidden and constrained. It should be improved by removing the retained Camden Goods Yard wall section.

12.35 The location and prominence of the entrance has been improved. Officers are encouraging of the removal of this section of wall, however it is shared with the neighbouring site so is partly outside the red line boundary. Any application would be considered on its own merits. It is hope that this can be developed over time.

The internal layout of the affordable housing block could be more efficient, allowing the building footprint to shrink and creating more ground level space.

12.36 The block has been redesigned following the DRP comments, extending further east and providing more affordable homes.

### Design conclusion

12.37 In conclusion, the proposals represent a high quality and contextual design response to the site, resulting from sophisticated analysis and options testing together with ongoing collaboration with officers and the Design Review Panel. The architect will be retained by Section 106 agreement to ensure that the development is carried out to a high standard.

#### 13. HERITAGE

## Designated and non-designated heritage assets

- There are a number of important heritage assets in the area. Special regard must be given to the preservation of a listed building, its setting or its features of special architectural or historic interest. In addition, special regard must be given to preserving or enhancing the character or appearance of a conservation area.
- 13.2 The site is in the Regent's Canal Conservation Area and is directly adjoining the Grade II\* Roundhouse. The proposal includes a listed building consent application for the works to the side wall of the Roundhouse, required to remove the existing structure that adjoins it.

- 13.3 There are some other listed buildings and conservation areas in the immediate area, and these are shown below. The site is shown edged red and the Roundhouse is marked A. The other listed buildings closest to the site are the Grade II Chalk Farm Underground Station (B), the Grade II\* Horse Hospital (C), and the Grade II Stanley Sidings (known as Stables Markets) (D).
- 13.4 Eton Conservation Area is to the northwest, Primrose Hill Conservation Area to the south, and Harmood Street Conservation Area to the northeast. Parkhill conservation Area further to the northwest, and West Kentish Town Conservation Area further to the north.

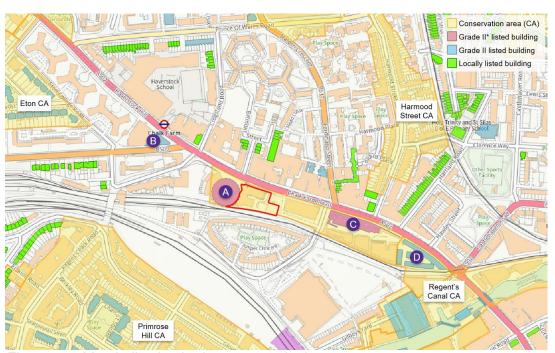


Figure 14 - Map indicating heritage assets in the area

Zone of Theoretical Visibility (ZTV) show that the proposed buildings would be less visible from further afield, with the more immediate context being the most impacted. Where they could be seen, these would be from relatively limited viewpoints, like Haverstock Hill to the west, from the Camden Goods Yard and railway lines to the south, Fitzroy Road to the south (in Primrose Hill Conservation Area, and some parts of Primrose Hill itself (which is not in the conservation area, but is a registered park). The ZTV is shown in the image below.



Figure 15 - Zone of Theoretical Visibility (ZTV) shown in yellow

## Regent's Canal Conservation Area – less than substantial harm

- The application site is located in a spur of the Regent's Canal Conservation Area (Sub Area 1: Stanley Sidings and Roundhouse), which defines the historic edge of the former railway goods yard that once dominated Camden Town, and of which the principal survivor is the adjacent grade-II\* listed Roundhouse, a landmark rotunda-shaped former railway building (see further details below).
- 13.7 The Regent's Canal Conservation Area Appraisal and Management Strategy describes how the concentration of industrial archaeology along the Camden section of the canal, with its associated railway features is of exceptional interest and quality. The Regent's Canal Conservation Area Appraisal describes the vicinity of the application site as follows:

"Views within the site are necessarily constrained and it is the progression of spaces and views through those spaces, which give the area its character. The exception being the "Camden Wall" or boundary wall to the Stanley Sidings, which curves gently along the western edge of Chalk Farm Road, terminating at the Roundhouse engine shed. ...

The Roundhouse is a major point of focus in architectural and townscape terms, and can also be seen from outside the conservation area on Regent's Park Road and Haverstock Hill. The building was originally constructed in 1846-7 as a locomotive shed but by the 1860's had become a liquor store for W & A Gilbey's. Today it is a vibrant performing arts centre."

- 13.8 The changing views, the variety and contrast of townscape elements, and the substantial industrial buildings and forms, like the Camden Wall, all contribute to the significance of the conservation area.
- This part of the conservation, with the substantial rail infrastructure and rail goods yards extended north, towards the Roundhouse, give the buildings and spaces in this area an important group value. This character, which includes the listed Roundhouse, Horse Hospital, and Stanley Sidings, also contributes to the significance of this part of the conservation area.
- The current building on the application site does not make a positive contribution to the conservation area. Despite being designed by an eminent architect, Richard Seifert, in the latter half of the 20th Century, it has a design concept which is generally out of keeping with the immediate environment, consisting of a cantilevered slab block facing the street with an inactive ground floor expressing a false replica section of the 'Great Camden Wall'. It has also been much altered having been reclad with blue panels some 30 years ago. As such, the site somewhat detracts from the wider historic group and its setting. The applicants have obtained a Certificate of Immunity from Listing, in connection with their proposed development for the site.
- 13.11 The loss of this deliberately impermeable structure (the fake camden wall) will cause a low level of harm to the conservation area, as it has significance due to its association with the former railway lands (as outlined above).
- 13.12 The metal appearance of the upper floors of the proposed buildings most particularly takes cues from the historic structures of the area, whereas the proposed masonry-faced bases give a more human feel and scale at street level in keeping with the 'Great Wall' and other structures. The upper-level framed facades are intended to express solidity and regularity, with the fins intended to emphasise the curve of the walls and the top 'parapet' left as an open frame giving a more lightweight appearance emulating a gas holder. The success of these modelling choices will depend on the quality and integrity of the specified facing materials and the flexibility and adaptability of the frame models to take different glazing and panel options as the towers adapt to different uses in the future.
- A level of harm is also identified arising from the design of the affordable housing block which since conception has increased in size so that it forms a taller and bulkier slab block infill in the gap between the easternmost tower and the new building planned for the former petrol station site. This could appear monolithic in some views as seen from Chalk Farm Road and from Juniper Crescent south of the railway tracks, read in conjunction with the collective mass of the three towers. This harm has been minimised through a range of design interventions. The proposed division of the massing, varying heights, curved forms and architectural treatment of facades all contribute towards limiting this impression. The division of the forms into

distinct buildings, including variation in heights, breaks up the impression of bulk. The rounded massing creates building surfaces that are dynamic and curving away from you within views. Further, the varying materials and elements of the facades give a subdivision and detail to the buildings that provide visual interest at a range of scales.

13.14 The increase in the scale arising from the proposals will change how the streetscape in which the Roundhouse, Stables Market buildings and other historic buildings are located is perceived and read. To this extent, the proposal will cause harm to this part of the conservation area, albeit less than substantial harm at the lower end of the scale.

## The Roundhouse (Grade II\*) – less than substantial harm

- As set out above, the Roundhouse contributes to the character of the area as part of a group of buildings and structures. The Roundhouse is an engine shed dating from 1846 and is contemporary with formation of London & Northwestern Railway (LNWR). It which originally contained a turntable, but was later repurposed as a bonded warehouse. The building has been a notable music venue since 1964 and this cultural use now forms part of its significance. It is the most prominent survivor of the railway infrastructure in the area, with its large rotunda brick form and conical slated roof and lantern being visible in long views, in particular from the north, west and east. The form, materials, and silhouette of the building, and its significant scale, all contribute to its significance.
- 13.16 It also has group value, sitting with the other buildings in this part of the conservation area and contributing to that wider industrial character and heritage. The Horse Hospital, the Wall and the Roundhouse and their settings are important components of this part of the conservation area. Their settings benefit from the comparatively low-rise row of buildings on the north side of Chalk Farm Road, emphasising the shift in scale. In this respect the setting also contributes to the significance of the Roundhouse.
- 13.17 The concept of three rotunda-shaped towers with a metal structure and cladding raised on a low podium takes its cues from the railway and industrial history of the surrounding area, including the bold forms of the Roundhouse and the former gas cylinders at King's Cross. It has also been inspired by a recent development of circular towers in central Copenhagen.
- 13.18 The listed building application submitted as part of the scheme involves the works to the fabric in order to remove the existing modern structures from the side of Roundhouse and repair the brickwork so that the proposal can be set back and better reveal this eastern wall. The works themselves are acceptable works or repair and conditions have been recommended to secure the detailed programme or works, including the methodology for detaching the steel beams from the Roundhouse, the measures to prevent

and minimise the potential for damage to the Roundhouse structure and walls, and supervision by a suitably qualified engineer.

13.19 The proposed development involves a shift in the siting and distribution of the accommodation across the site from the existing arrangement. The main bulk of the current building is situated directly behind the pavement, whereas the proposals focus the accommodation towards the back of the site, including the affordable housing block. One of the three rotunda towers, however, will sit forward of the others with a notable presence on the street above the ground-floor podium. The sizeable increase of the height bulk and mass of the replacement accommodation will therefore have a greater impact on local views, with resultant impacts on the designated heritage asset due to its immediate proximity to the site and its distinctive conical roof and lantern which create a distinctive silhouette on the skyline, particularly as seen in both directions along Chalk Farm Road, from Haverstock Hill, from Regent's Park Road and the Camden Goods Yard and from Crosland Road and other residential streets to the north of Chalk Farm Road (albeit the Roundhouse is a large and robust structure in its own right). The views below show the before and after of the view from the bottom of Haverstock Hill.



Figure 16 - View from the bottom of Haverstock Hill (before)



Figure 17 - View from the bottom of Haverstock Hill (after)

- 13.20 That said, harm from these views, (and from the east) have been minimised through use of curved forms. From the east the curved corner of the proposal blocks less of the RH behind compared to the existing square corner condition. Similarly, in the above view, the curved forms take the massing away from the Roundhouse. The broken-up massing forms less of a single barrier backdrop to the building compared to the current square single block, albeit at a greater height.
- As such, the proposal would still harm the significance of the Roundhouse through the impact on its setting. Other arrangements were explored, and although the harm is at the lower end of less than substantial, the harm could have been reduced further if individual blocks step away height-wise from the grade II\* listed building so that the tallest block be situated furthest away and the lowest closest to it. However, this would have had other negative consequences, including the standard of accommodation, moving more noise sensitive uses closer to the Roundhouse, and the impact on the public realm and street scene in general design terms. These matters have also been given considerable weight and on balance, it is considered that the current distribution is the optimum layout, balancing harm overall.

## Horse Hospital (Grade II\*) and Stanley Sidings – no harm

13.22 These listed buildings are within the section of the conservation area which extends north towards the Roundhouse. Although they form part of the historical industrial past of this interchange area, they are further removed from the proposal and the visual link between them and the site is limited. This will be even more so once the PFS site is developed as the building will

block any visual connection. Their significance, and that which derives from setting and group value in this part of the conservation area, would be preserved. The images below show the comparison of before, and after (with the PFS massing included).



Figure 18 - View from corner of Ferdinand Street (east) before



Figure 19 - View from corner of Ferdinand Street (east) after

# Drinking fountain and cattle trough (both Grade II) – preserved / enhanced

- 13.23 A drinking fountain located to the west at the corner of Regent's Park Road. This has a connection to the Roundhouse and the other industrial and historical buildings in the area, but insofar as its setting contributes, the proposal will not impact on it so it is preserved.
- Also of significance is a grade II listed Metropolitan cattle trough which is located on the edge of the pavement in front of the application site, and which has a relationship with the Roundhouse and historical rail infrastructure. The cattle trough has been on the Historic England Heritage at Risk Register for some 30 years, in recognition of its disuse, gradual decay and exposure to hazards adjacent to a busy road.
- 13.25 The proposals include the relocation and restoration of the grade II listed Metropolitan cattle trough currently located by the bus stop in front of the site. The applicants have liaised with Camden conservation and highways officers to relocate the trough away from the kerbside to the back-of-pavement so it directly interacts with the scheme's landscape proposals as a feature in its own right. It is anticipated that the incorporation of the trough into the scheme will sustain its longevity, together with the cleaning and restoration of the stonework, the latter of which should be controlled by condition as requiring method statements for firstly the dismantling, relocation and reassembly of the trough, and secondly covering cleaning and repairs. If the works are successfully completed, it should be possible to remove the trough from the HAR Register after many years and its significance enhanced. This is off the site on highway land so would need to be controlled through other means a sperate Listed Building Consent application and a s278 agreement. Condition 10 would secure a programme for these works together with controls under the s278 agreement.

## Chalk Farm Underground Station (Grade II) - no harm

An early 20<sup>th</sup> Century underground station designed by Leslie Green, which became part of the Northern Line. There are surviving internal features contributing to its significance, but externally, it represents one the most impressive and distinctive surviving Leslie Green stations. As part of the Yerkes group of stations designed by Green it illustrates a phase in the development of London's transport system, with pioneering use of a strong and consistent corporate image with the characteristic ox-blood faience façades are instantly recognisable and among the most iconic of London building types. These features make a crucial contribution to its significance. Setting is less important with an evolving urban context around. To the extent that setting does contribute to significance, is its visibility and standing on the corner of the junction.

13.27 The proposal would not alter these elements, and only provide a changing urban environment around it, not undermining its presence on the corner of the junction. As such, its character and appearance would be preserved and there would be no harm.

#### Primrose Hill Conservation Area – no harm

- 13.28 The Primrose Hill Conservation Area is further to the south and views of the development are limited. This suburban townscape provides important evidential value for the evolution and development of this part of London in the 19th Century and as such, contributes to the significance of the conservation area. To the south-west, the open space of Primrose Hill forms a green setting to the conservation area, contributing positively to its significance.
- The towers would pop up over the top of the boundary wall from the rail bridge which is just in the very corner of the Conservation Area (see green wireframe below), but this view of largely open sky is not part of the significance of the conservation area.



Figure 20 - View from the corner of Regent's Park Road Bridge

13.30 There is a clear view of the Roundhouse from Fitzroy Road, but this does not directly contribute to the conservation area's significance which has a greater connection to the green spaces around it. Nonetheless, the view would be preserved with the proposed towers appearing next to it. As such, there would be no harm to the conservation area. See image below.



Figure 21 - View from Fitzroy Road

- 13.31 The elevated views from Primrose Hill, a registered park, are notable in London and have a long historical association as a key viewing point across the capital. Primrose Hill, although a registered park, is not itself in the conservation area but the association has influenced the development of the conservation area and is considered an important element of its character and significance through its setting.
- The view from Primrose Hill is part of the London View Management Framework and the site sits just to the edge of the viewing corridor for Protected Vista 2A.2 "Parliament Hill: The Summit looking towards the Palace of Westminster". However, the proposal would fit in the foreground of the view with no harmful impact on the skyline (see green wireframe below). The Viewing Corridor is just to the left of the green wireframe, between Euston Tower and the BT Tower, so there would be no impact on the view or the wider appreciation of the Palace of Westminster.



Figure 22 - View from Primrose Hill (Protected Vista 2A.2)

## Eton and Harmood Street Conservation Areas - no harm

- 13.33 Eton and Harmood Street Conservation Areas are further away from the site and have less visual connection. Although there are some views towards the site and the Regent's Canal Conservation Area, the visual connection does not contribute to their significance through setting. The are generally residential and suburban in character. Harmood Street Conservation Area is the closest, but again its significance arises from the retention of a large proportion of the stock brick terraced houses of 'cottage' character, which form part of the original phase of 19th Century development.
- 13.34 The contrast and distinction between larger industrial railway structures and the residential context is consistent with the historic development and character of the area. The proposal maintains a contrast and so any limited views preserve the significance of the conservation areas.

## Locally listed buildings (non-designated) - no harm

13.35 The closest locally listed buildings are the pub on the corner of Haverstock Hill and Crogsland Road to the northwest, and the buildings opposite the site just off the high street, at 4-8 and 7-11 Belmont Street. These are outside of the conservation area and are locally listed for their features. The pub is a simple bold design with stock brick and stucco decoration retaining some historic detailing on the shopfront such as the large timber windows and glazed tiles. Buildings on Belmont Street form two corner blocks at the end of the southern stretch of Belmont Street and returning around the corner to face the open area formed between the two arms of Belmont Street. These are domestic and at odds with the high-street character further to the south, but are important in forming the southern end of this 'square'.

- 13.36 To the extent that setting does contribute to these groups of locally listed buildings, it is the area on the north of Chalk Farm Road that relates and provides context, with the area to the south in stark contrast with large industrial buildings. The proposal would not undermine that relationship and so preserves their significance.
- 13.37 The other locally listed buildings in the area do not have a spatial relationship to the proposal and most are some distance away, so there is no impact.

## Summary of impacts

- 13.38 Overall, the proposal would result in less than substantial harm to the significance of the of the Grade II\* listed Roundhouse. This results from the impact on the setting of the building in terms of the increase in height and massing close by. The harm would be on the lower end of the scale.
- 13.39 In addition, the proposal would also harm the character and appearance of the Regent's Canal Conservation Area, albeit at the lower end of less than substantial. This harm to significance is due to the demolition of the solid replica Camden Wall and its association with the former railway lands, the height increase in this part of the conservation area, and the appearance of Building 2 (the AH block) as more of a slab in certain limited views.
- 13.40 The harm to these designated assets, although less than substantial, has been given considerable importance and weight. The proposal would preserve the significance of other designated and non-designated assets in the area.
- 13.41 Where harm is identified to designated assets, considerable weight and importance should be given to that harm, and it should be outweighed in the balance by considerable public benefits.
- 13.42 Paragraph 208 of the NPPF states:
  - 208. 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.
- 13.43 There are a range of significant public benefits arising from the proposals, and these benefits are discussed throughout the report. These also include several heritage benefits which should be considered in the planning balance.

## Heritage benefits

13.44 Alongside the harm identified to the setting of nearby designated heritage assets, there is some benefit to weigh in the planning balance arising from the removal of a utilitarian low-rise post-war block situated on the west side

of the site, which sits uncomfortably next to the Roundhouse eastern steps (forming an emergency exit to the music venue). The building's removal in conjunction with the proposed landscaping works will open up this side of the Roundhouse as seen from street level, revealing a larger section of the building than is currently viewable from the public realm. The landscaping works will form part of a wider set of proposals to make the application site more permeable and more accessible to the public in conjunction with the existing outdoor space in front of the Roundhouse which will be enhanced by the proposals both in terms of it quality and its usability by visitors to both sites.

13.45 The proposals include the relocation and restoration of the grade II listed Metropolitan cattle trough currently located by the bus stop in front of the site. The applicants have liaised with Camden conservation and highways officers to relocate the trough away from the kerbside to the back-of-pavement so it directly interacts with the scheme's landscape proposals as a feature in its own right. It is anticipated that the incorporation of the trough into the scheme will sustain its longevity, together with the cleaning and restoration of the stonework. A condition secures the details of the relocation, remediation, cleaning and repair of the trough which would include timescales. This would also include protection during the construction works. The works would also require separate Listed Building Consent so the condition would need to align with the separate consent and the condition would need to be discharged before any above ground works. A s278 agreement for highways works would include the works to remove and relocate the structure as it is currently on the highway. This would allow it to be removed the trough from the HAR Register after many years.

# Heritage conclusion

13.46 The harm to heritage assets is limited to a lower level of harm and the harm is capable of being outweighed by the public benefits of the scheme which include heritage benefits. As such the scheme complies with the development plan and in particular with CLP policies D1 and D2.

## 14. NATURE CONSERVATION, LANDSCAPE AND BIODIVERSITY

14.1 London Plan policy D8 (Public realm) states that new development proposals should seek to create new public realm and that the public realm should be of a high quality. The Camden Local Plan policies A2 (Open space) and A3 (Biodiversity) and Camden CPG Biodiversity seek to protect existing trees, secure additional trees and vegetation and to protect and promote biodiversity.

#### Trees

14.2 The scheme involves the removal of two tree groups, all of which are category C (low quality) in accordance with BS5837:2012. While these are

visible from the public realm and provide some degree of amenity and biodiversity, they consist of opportunist, self-sown trees, shrubs and ground cover that are not sustainable in the long term. The loss of amenity and canopy cover could be mitigated against through the replacement planting proposed which consists of 18 trees.

- 14.3 The impact of the scheme on the 3 trees to be retained (those within the public realm to the north of the site) will be of an acceptable level. The tree protection details are considered sufficient to demonstrate the trees to be retained will be adequately protected throughout development.
- 14.4 Conditions requiring compliance with tree protection details and landscaping details to include details of replacement trees and tree pit sizes will secured theses requirements (condition 4 and 21).

## **Biodiversity**

- 14.5 The site is currently of limited biodiversity value with much of the site comprising habitats which are of limited or no value in biodiversity terms. There is a small cluster of trees in the southeast corner which would be removed to facilitate the development.
- 14.6 A Biodiversity Impact Assessment and Urban Greening Factor Assessment were submitted with the application and reviewed by the Council's Nature Conservation officer.
- 14.7 The application was submitted a week before Biodiversity Net Gain became a statutory requirement and so it is not subject to the 10% uplift. Nonetheless, the assessment does apply the BNG methodology and concludes there would be a compliant uplift. However, often more challenging to meet on brownfield sites is a suitable Urban Greening Factor.
- 14.8 Urban Greening Factor (UGF) is a land-use planning tool to help determine the amount of greening in new developments. London Plan policy G5 (Urban greening) sets a target of 0.3 for the UGF for commercial developments and 0.4 for residential developments in reflection of the additional pressure residential developments put on local green space. Given this is a residential-led scheme, the higher 0.4 value is a more appropriate target. The proposals demonstrate a shortfall with a UGF of 0.33, although this exceeds the target for non-residential development. The Nature Conservation officer accepts this but recommends a condition to ensure the green roofs are maximised as the current proposal does not extend the green roofs underneath the solar PV panels and so fails to maximise green infrastructure. More extensive green roofs will improve the UGF score, as will choices around the final planting scheme.
- 14.9 A condition is also attached regarding details of 12 bird and 6 bat boxes to be incorporated into the building fabric or biodiverse roofs.

14.10 Given the above, the proposals are considered acceptable in nature conservation, landscape and biodiversity terms in line with the development plan.

#### 15. PUBLIC OPEN SPACE AND PLAY SPACE

- 15.1 CLP policy A2 seeks to secure publicly accessible open space as part of a scheme to address the impact of schemes on the demand for public open space. This takes account of the scale of the proposal, the number of future occupants and the land uses involved.
- The Public Open Space CPG states that developments with 11 or more dwellings should provide 9sqm of Public Open Space (POS) for every residential occupier and 0.75 sqm of POS for student occupiers. With 30 new homes and a large amount of student housing, this development triggers the requirement. The CPG also expects new commercial floorspace over 1,000sqm to provide 0.74sqm of POS for every worker, but this requirement is not triggered if the development's commercial uplift is less than 1,000sqm as is the case with the current application.
- The residential POS requirement is 9sqm x 30 (the number of additional dwellings) x 2.12 (the average dwelling occupancy for Camden Town with Primrose Hill ward) = 572.4 sqm. The student housing POS requirement is 9sqm x 264 (the number of student rooms) x 0.75 (multiplication factor) = 1782 sqm. The total open space requirement is therefore 2354.4 sqm.
- Although the proposal includes roof terraces and a podium garden for the occupiers as well as public realm improvements by opening up the site at ground floor level, the scheme would provide no true public open space and so these components cannot count towards the POS provision, which is separate from private amenity space. The site is highly constrained and providing a policy compliant amount of public open space on site would leave most of it undeveloped or without any private amenity space. In a dense urban environment, on a Town Centre high street, this would not be an efficient use of land and would leave a hole in the townscape.
- Where it is not feasible to deliver the full amount of public open space required, the CPG accepts a financial payment in lieu (PIL). The PIL is used for provision, maintenance, and improvement of new and existing open space.
- The PIL is made up of a capital cost and maintenance cost contribution. The capital cost is calculated at a rate of £200/sqm which would be £470,880 and the maintenance cost is calculated at a rate of £70/sqm (covering a 10 year period) which would be £164,808. Therefore, the total POS contribution is £635,688. The Public Open Space PIL would be secured by s106 agreement, accordance with CLP policy C2.

## Management of the public realm

- 15.7 While the areas of improved public realm to the front of the site are not public open space, they provide space for members of the public to use and dwell. The site management and presence of staff means that these spaces can be managed effectively. There will be the need to have close co-operation with the adjacent landowners in terms of ongoing management of the space and how it interacts with the neighbouring buildings and spaces.
- The Roundhouse has regular events which can attract large crowds, and queuing is often carefully planned and managed outside the venue. The developer will need to consider how the management of the space in their red line boundary is co-ordinated with the Roundhouse during particular events, as well as general operational requirements for the venue. This would also extend to the Roundhouse evacuation points and routes which go across the application site (see Fire Safety section).



Figure 23 - CGI showing public realm during Roundhouse event

- On the other side of the site is the open space or pocket park approved as part of the Camden Goods Yard PFS site and secured as a Youth Space. The Council are in discussions with St George as to whether this is the best purpose for the space and whether the obligation may be better achieved elsewhere in the vicinity. Notwithstanding this, the co-ordinated management of the space with the surrounding buildings and public realm will be secured through a Public Realm Management Plan.
- 15.10 The management of these areas of public realm, and the interaction with the two neighbouring sites, will be secured as part of a Public Realm Management Plan produced in consultation with the neighbouring land owners and operators, secured by s106 agreement.

## Play space

15.11 Play space is recognised by CLP policy A2 as important to supporting the development of children and young people. The LP requires formal provision to be typically made on-site with 10 sqm provided per child. CPG *Public open space*; however, recognises that the 9qm per occupant already includes an element of play provision so expects an extra 6.5 sqm per child. Based on the unit mix and expected occupancy of the housing, the play space requirement is 123 sqm for 0-11 year olds. A dedicated formal play area is provided in the communal amenity area and details of an inclusive play strategy shall be secured by condition (Condition 24).



Figure 24 – Communal garden including playspace at the rear of the site

- 15.12 It has not been possible to accommodate 29 sqm of play space for older children (ages 12-15) due to space constraints; however, guidance recognises this can be within an 800m walking distance from home. Talacre Gardens is a 9-minute walk (700m) and provides play facilities for older children. The development is sited adjacent to an area of open space on the PFS site, originally designated a Youth Space, which has not yet been developed; though it is not yet known whether this space will be used for its original purpose or more general public space.
- 15.13 Overall, the play space provision is acceptable given the proposal, its location, and the site constraints.

## 16. HEALTH IMPACT

16.1 Camden Local Plan policy C1 seeks to promote strong, vibrant, and healthy communities and requires major development proposals to include a Health Impact Assessment (HIA). Accordingly, a HIA has been submitted with the application and reviewed by an officer from London's Healthy Urban

Development Unit (HUDU). The HUDU officer finds the HIA to comprehensively detail the four main themes of Housing, Active Travel, Heathy Environment and Vibrant Neighbourhoods. The officer agrees with the conclusion that the overall health impact of the scheme will be positive with no negative impacts identified and with mitigation methods specified where the impact is deemed to be neutral.

- One area of dispute is around the pressure on healthcare services. The HIA suggest that the new student population is more likely to register with a GP close to their place of education rather than accommodation; however, this is considered unlikely given the distances involved and the fact that face to face teaching has decreased in favour of remote working practices.
- As such, it is likely that the development will place further pressure on NHS health infrastructure and a financial contribution is therefore sought. The Camden CIL spending list includes health, but this is normally for council projects and as a general indicative spending list, there is no guarantee that CIL receipts will be allocated towards health infrastructure specifically to mitigate the impact in the immediate area.
- The request for the financial contribution would go to the NHS to directly address the likely additional pressure on the NHS care services in the area because of the increased population demographic. The NHS has indicated this funding is likely to go towards the internal refurbishment of the Roy Shaw Centre to provide a GP practice or the expansion of Crowndale Practice. A nearby planned Mental Health Hub on Greenland Road would also benefit from investment. The final contribution is being negotiated but will take account of CIL and the expectation that a proportion of students will remain registered with doctors outside of Camden and because students are more likely to use digital services. The Health Impact Contribution will be secured by \$106 agreement.
- 16.5 HUDU raise concern about the development being located beside a number of noise generating businesses and the railway line which will affect students as much as any other occupier. They advise that the development is subject to noise protection conditions which the Council agree must be secured (see noise sections of report).
- 16.6 HUDU also flagged the limited opportunity for private amenity space within the site but noted that the shared amenity space and the proximity of green space nearby, the provision could be deemed acceptable
- 16.7 To mitigate potential negative health impacts from construction in terms of noise, dust and pollution, a Construction Management Plan would be secured via section 106 agreement in line with the development plan.

## 17. BASEMENT CONSIDERATIONS

- 17.1 Camden Local Plan policy A5 (Basements) seek to permit basement development where it is demonstrated that it will not cause harm, structurally, in amenity terms, environmentally or in conservation/design terms.
- 17.2 A new basement level is proposed as part of the development across part of the site, as shown on the image below.



Figure 25 - Proposed basement level

- 17.3 The application was accompanied by a Basement Impact Assessment authored by individuals with appropriate qualifications. An independent review was carried out by the Council's basement consultant (Campbell Reith) who reviewed the Basement Impact Assessment for potential impact on land stability and local ground and surface water conditions arising from basement development.
- 17.4 The BIA audit review concludes the following:
  - A maximum damage of Burland Category 1 ('negligible') to neighbouring properties, including the Grade II\* listed Roundhouse;
  - The basement would have low risk of flooding from surface water;
  - With the inclusion of SUDS, the basement would avoid an adverse impact on the hydrology and hydrogeology of the area;
- 17.5 Campbell Reith concludes that the BIA is adequate and in accordance with the criteria laid out in policy A5 and guidance contained in CPG Basements It recommends securing a Basement Construction Plan (BCP) which should be informed by additional ground investigation work. The proposed

basement is considered acceptable, subject to a Section 106 obligation requiring a Basement Construction Plan (BCP) which is secured in light of the scale of the scheme and the adjacent listed building. The appointment of a suitably qualified engineer to oversee the works will be secured by condition (Condition 7).

#### 18. ENERGY AND SUSTAINABILITY

- 18.1 In November 2019, Camden Council formally declared a Climate and Ecological Emergency. The council adopted the Camden Climate Action Plan 2020-2025 which aims to achieve a net zero carbon Camden by 2030.
- In line with London Plan (LP) policies, SI1, SI2, SI3, SI4, SI5 and SI7 and Camden Local Plan (CLP) policies CC1, CC2, CC3, and CC4, development should follow the core principles of sustainable development and circular economy, make the fullest contribution to the mitigation of and adaptation to climate change, to minimise carbon dioxide emissions and contribute to water conservation and sustainable urban drainage.

## Redevelopment strategy

- The GLA's Circular Economy Statement LPG sets out a design approach for existing buildings and includes a decision tree to inform the design process from the outset. The stages are: retain and retrofit; partial retention and refurbishment' disassemble and reuse; and demolish and recycle. Policy CC1 of the Camden Local Plan requires all development proposals that involve substantial demolition to demonstrate that it is not possible to retain and improve the existing building (part e) and optimise resource efficiency (part f).
- 18.4 Feasibility studies were undertaken early in the pre-application process to explore whether retention of the existing buildings in full or in part was feasible and could deliver the development objectives. A report entitled 'Retention & Redevelopment Options & WLC Comparison' was submitted with the application that looked at the potential for reuse of the existing building, its opportunities and limitations, together with its condition. Three development options were explored: Option 1 retention and retrofit; Option 2 retention and retrofit with extension and new build; and Option 3 new build (i.e. the current application).
- Firstly, the existing building has a number of limitations that would require major modifications to achieve high quality, accessible internal space. It is elevated 2m above street level with no step free access which would remain a fundamental limitation with Option 1. For Option 2, it would require substantial undermining and temporary support works whilst its lower structure is reconstructed. Option 3 provides a fully accessible ground floor. Also, the building has average low floor-to-ceiling heights of 2.3m which would not meet modern day standards (2.45m 2.8m, British Council of

Offices; 2.5m, GLA design guidance) once servicing is added to the ceiling. It also has deep floor plates that would require a reliance on artificial lighting in the centre of the plan making it challenging for a non-office use. It is noted that the existing façade, by virtue of its age and materials, performs poorly and any retrofit would require a new façade to meet building regulations. All servicing would need to be replaced.

- 18.6 It is recognised that these limitations are not insurmountable and there will be cases where a building has similar features and a retention and retrofit option is the best-case scenario. However, in this case, the proposal seeks transformative development to significantly increase site capacity, provide sought after land uses and improve the public realm environment. Retaining the existing building would not allow the site to realise its full potential, and making the most of the site requires a new approach to site layout.
- 18.7 To ensure greater resource efficiency through recycling and reuse of materials, a condition requiring 95% of construction and demolition waste to be reused, recycled, or recovered, and 95% of excavation waste to be put to beneficial use is attached (condition 36) in line with policy S12 of the London Plan.

## Whole Life Carbon

- The Whole-Life Carbon (WLC) emissions are the total carbon emissions resulting from the construction and the use of a building over its entire life (this is assessed as 60 years), and it includes its demolition and disposal. This is split into modules that assess each stage of the building's life.
- The A-Modules concentrate on the emissions from the building materials (A1-A3 extraction, supply, transport and manufacture) and the construction stages (A4-A5 transport, construction and installation).
- 18.10 The B-Modules concentrate on the use stage of the building (B1-B5 use, maintenance, repair, replacement, refurbishment), but the modules that deal with operational energy and water use are excluded (B6-B7). This is because they are "regulated emissions" and so are considered separately and in detail in relation to the zero-carbon target (see the "Energy and carbon reductions" section below).
- 18.11 The C-Modules deal with the end-of-life stage of the building (C1-C4 deconstruction demolition, transport to disposal, waste processing for reuse, recovery or recycling, disposal).
- 18.12 Carbon sequestration is when carbon dioxide is removed from the atmosphere and held in materials, for example the carbon absorbed by trees as they grow and locked in timber until the end of its life. It is important to consider this in the end-of-life phase because the carbon is released again

at the end of its life (when it decomposes), so it is included in the total A-C-Modules.

18.13 The GLA WLC assessment guidance sets out minimum benchmarks for different building typologies per square metre of gross internal area in kilograms of carbon equivalent (kgCO<sub>2</sub>e/m<sup>2</sup> GIA). It also encourages development to aim for more ambitious aspirational benchmarks. The table below shows how the development performs against the residential benchmarks, as well as the aspirational targets as these are the most appropriate for comparison for this development. The figures provided are from the updated WLC Assessment 23 May 204.

Modules	Min benchmark RESIDENTIAL (kgCO₂e/m² GIA)	Aspirational Benchmark for RESIDENTIAL (kgCO <sub>2</sub> e/m <sup>2</sup> GIA)	Proposal (kgCO₂e/m² GIA)
A1-A5	<850	<500	647
B-C (excl B6 & B7)	<350	<300	353
Total A-C (excl B6&B7 but inc sequestration)	<1200	<800	993

Table 9 - Summary of Whole-Life Carbon results for the residential development

18.14 In this case, the development generally meets the benchmarks as shown above. It doesn't quite meet the benchmark for B-C narrowly missing it by 3kgCO2e/m2. The proposal doesn't surpass the aspirational benchmarks but further work through the energy and sustainability plans (secured by s106 agreement) can help to bring it closer to those aspirational targets. Condition 32 is attached to make sure a post construction assessment of WLC is completed and provided for monitoring and compliance.

# Energy and carbon reductions

- 18.15 To minimise operational carbon, development should follow the energy hierarchy set out in LP Chapter 9 (particularly Policy SI2 and Figure 9.2) and major developments should meet the target for net zero carbon. The first stage of the energy hierarchy is to reduce demand (be lean), the second stage is to supply energy locally and efficiently (be clean), and the third step is to use renewable energy (be green). The final step is to monitor, verify and report on energy performance (be seen).
- 18.16 After carbon has been reduced as much as possible on-site, an offset fund payment can be made to achieve net zero carbon.

## Energy and carbon summary

18.17 The following summary tables show how the proposal performs against the policy targets for operational carbon reductions in major schemes, set out in the LP and Camden Local Plan.

Policy requirement (on site) (Site wide)	Min policy target	Proposal reductions
Be lean stage (low demand): LP policy SI2	N/A	11.4%
Be green stage (renewables): CLP policy CC1	20%	35.2%
Total carbon reduction: LP policy SI2 and LP CC1	35%	42.6%

Table 10 - Site wide carbon saving targets (for majors) and the scheme results

Policy requirement (on site) (Residential)	Min policy target	Proposal reductions	
Be lean stage (low demand): LP policy SI2	10%	12.3%	
Be green stage (renewables): CLP policy CC1	20%	75.5%	
Total carbon reduction: LP policy SI2 and LP CC1	35%	78.5%	

Table 11 - Residential area carbon saving targets (for majors) and the scheme results

Policy requirement (on site) (Non-residential)	Min policy target	Proposal reductions
Be lean stage (low demand): LP policy SI2	15%	11.8%
Be green stage (renewables): CLP policy CC1	20%	10.6%
Total carbon reduction: LP policy SI2 and LP CC1	35%	20.2%

Table 12 - Non-residential area carbon saving targets (for majors) and the scheme results

18.18 The operational carbon savings and measures set out below will be secured under an Energy and Sustainability Strategy secured by Section 106 legal agreement which includes monitoring, in compliance with the development plan.

## Total carbon reductions

18.19 Reductions are measured against the baseline which are the requirements set out in the Building Regulations. Major development should aim to achieve an on-site reduction of at least 35% in regulated carbon emissions below the minimums set out in the building regulations (Part L of the Building Regulations 2021). To achieve net zero carbon, a carbon offset payment will be secured that offsets the remaining carbon emissions caused by the

- development after the required on-site reductions, measured from the agreed baseline.
- This is charged at £95/tonne CO<sub>2</sub>/yr (over a 30-year period) which is 41.9 tonnes x £95 x 30 years = £119,386. This amount will be secured by a s106 agreement and spent on delivery of carbon reduction measures in the borough.
- 18.21 It is acknowledged that due to the changes to Part L 2021 with SAP10.2 carbon factors, these targets may be more challenging for non-residential developments to achieve initially. This is because the new Part L baseline now includes low carbon heating (like ASHP) for non-residential developments. The proposals should look to incorporate all feasible options to minimise the energy demand and maximise renewable energy if the targets are not met.
- 18.22 Residential development should be exceeding the target now, so GLA guidance has introduced a more challenging aspirational target of 50% onsite total savings that residential development should aim to achieve.
- In this case, the development meets the policy target of 35% reductions, achieving an overall on-site reduction of 42.6% below Part L requirements as shown in Table 10 above. The residential areas achieve a reduction of 78.5% which exceeds the aspirational 50% target. However, the non-residential areas only achieve a reduction of 20.2% which does not meet the 35% target. The aforementioned carbon offset of £119,386 will be secured to bring it to zero carbon, in compliance with the development plan.

## Be lean stage (reduce energy demand)

- 18.24 London Plan policy SI 2 sets a policy target of at least a 10% (residential) and 15% (non-resi) reduction through reduced energy demand at the first stage of the energy hierarchy.
- 18.25 In this case, the development meets the policy target of 10% (residential), reducing emissions by 12.3% at this stage through energy efficient design, in compliance with the development plan. However, it does not meet the target of 15% (non-residential), reducing emissions by 10.8% at this stage through energy efficient design. The proposals involve good performance insulation, low air permeability (3m3/hm2 for the residential and 2 for nondomestic), efficient glazing, and generally addresses the requirements of the cooling hierarchy and overheating but does propose active cooling for acoustic reasons which increases the energy demand. The proposal includes energy efficient measures like MVHR, low energy light fittings but not waste water heat recovery, though a condition will secure a feasibility assessment (Condition 8). The proposals include cooling for the nonresidential areas through air source heat pumps and for the residential areas through air tempering on the mechanical ventilation.

The justification provided for active cooling is that the homes are not able to ventilate naturally due to acoustic constraints (including proximity to the road, railway and Roundhouse). An overheating assessment has shown that with windows closed and using MVHR with tempered air (TVMHR), all windows would pass CIBSE TM59 (technical basis referenced in LP policy SI 4 for residential developments), though no testing has been carried out for a scenario where windows are closed with no active cooling. The Overheating Assessment states that TVMHR will only be activated when the internal temperature exceeds 22°C and this will be secured to ensure it is only used when required (Condition XX).

## Be clean stage (decentralised energy supply)

- 18.27 London Plan Policy SI3 requires developers to prioritise connection to existing or planned decentralised energy networks, where feasible, for the second stage of the energy hierarchy. Camden Local Plan policy CC1 requires all major developments to assess the feasibility of connecting to an existing decentralised energy network, or where this is not possible establishing a new network.
- In this case the applicant has carried out an investigation and there are no existing or planned district heating networks within the vicinity of the proposed development. They have contacted relevant stakeholders including the borough energy officer, local heat network operators and nearby developers and asked whether they know of any local heat network connection opportunities. Evidence of the correspondence has been submitted. However, given its location, a section 106 clause is recommended requiring future connections to be safeguarded and to ensure it has been designed to connect any future district heat network.

## Be green stage (renewables)

- 18.29 Camden Local Plan policy CC1 requires all developments to achieve a 20% reduction in CO2 emissions through renewable technologies (after savings at Be Lean and Be Clean), where feasible, for the third stage in the energy hierarchy.
- In this case, the development meets the policy target of 20% overall, reducing emissions by 35.2% at this stage through renewables, in compliance with the development plan. The residential areas significantly exceed this with a 78.5% reduction but the non-residential areas do not meet the requirement with a 20.2% reduction through renewables over the Part L baseline which already includes an assumed level of low carbon heating. The proposal includes 30.4kWp of PV panels on the roof with full details including an overshadowing assessment to ensure the coverage of PV is maximised to be secured by condition XX. The proposal includes low carbon heating through Air Source Heat Pumps (ASHPs) which are proposed in a plant area on the roof of the building with full details secured by condition XX.

# Be seen (energy monitoring)

- 18.31 The London Plan policy SI 2 requires the monitoring of energy demand and carbon emissions to ensure that planning commitments are being delivered. In this case, the development has committed to reporting.
- 18.32 The Energy and Sustainability Strategy secured by Section 106 legal agreement will secure reporting to the GLA in line with their published guidance.
- 18.33 Overall the scheme performs well and provides significant site wide savings beyond the Building Regulations and so complies with the development plan as a whole in this regard.

## Climate change adaption and sustainable design

- Local Plan policy CC2 expects non-residential development, which in this context includes student accommodation, to meet BREEAM Excellent. The proposals meet the overall BREEAM excellent standard for both the student accommodation and also the retail areas. All the targets for energy, water and material credits have been met. For the student accommodation the target of 63% for energy, 75% for water and 57% for materials and for retail, 68% for energy, 100% for water and 40% for materials should be secured through section 106 legal agreement.
- 18.35 The applicant indicates from the results of the Dynamic Overheating Analysis, that both the student accommodation and affordable housing requires active cooling (TMVHR) as the windows must be closed at night due to external noise levels. Full modelling results have not been provided but to overcome the potential for the active cooling to be used freely, a condition will require the units to be activated only in the event of internal temperatures reaching 22 degrees Celsius (Condition 26).

#### 19. AIR QUALITY

- 19.1 Camden Local Plan policy CC4 is relevant with regards to air quality. Owing to the scale of development, the introduction of sensitive uses and the potential to have an adverse impact on local air quality, a detailed Air Quality Assessment (AQA) has been submitted as part of this application which has been assessed by the Council's Air Quality Officer.
- The proposed development is located adjacent to the busy Chalk Farm Road and a section of the London Overground railway line used by diesel trains. It will introduce new sensitive residential uses into an area of potentially poor air quality. The proposal incorporates Mechanical Ventilation to improve Air Quality for the future occupants. A condition will require details of air inlet locations to be submitted for approval.

19.3 A play area is proposed at podium level to the rear of the site which is close to a railway line used by diesel trains (though not at a high volume). This carries some risks given currently unknown frequencies of diesel trains idling next to the site, but future electrification of the fleets and future improvements in air quality means exposure levels will be acceptable.

## Operational impact of development on local area

- 19.4 Two emergency diesel generators are proposed which would only operate in the event of fire and be used for life saving functions only including evacuation lifts, sprinklers, smoke / AOV shafts and fans. The flue would be located 1m above the affordable housing building and not within a 20m radius of any taller buildings. Final details will be secured by condition. The AQA states that the generators will be tested for a maximum of 10 hours per year which is within acceptable limits and will be controlled by condition.
- The proposals are car-free, uses electrified heating and as such achieves Air Quality Neutral.

## Construction impact of development on local area

- 19.6 The area is highly sensitive to dust soiling. It is noted that all construction phases will create a medium risk of impact and therefore it is necessary to monitor Air Quality in two locations. The Air Quality monitors have already been installed following liaison between the developer and the Council's Air Quality officer to agree locations. Photographic evidence of the installations have been provided.
- 19.7 Air quality during demolition and construction would be managed with the CMP, which is secured by Section 106. Real time air quality monitoring is required by condition. Any Non-Road Mobile Machinery (NRMM) used on site for the construction will need to comply with the latest engine requirements via condition 37. Overall, the scheme meets the air quality requirements of the development plan.

#### 20. MICROCLIMATE

- 20.1 Policy A1 of the Camden Local Plan 2017 acknowledges the impact that large developments can have on the local climate. CPG Amenity requires new developments to consider the local wind environment, local temperature, overshadowing and glare both on and off site.
- 20.2 Additional guidance from TfL's Healthy Streets for London recommends that streets should design in opportunities for sun, shade, and shelter from high winds to create places that can be enjoyed all year round.
- 20.3 A Wind Microclimate Assessment Report has been submitted. It concludes there are no wind safety risks associated with the proposed development and that wind comfort conditions will be suitable for the intended use for all

thoroughfares, building entrances, bus stops, and existing and proposed amenity terraces. There would be areas where the comfort category shifts from sitting to standing; however, the vast majority of this area is road or railway land. For the cumulative scenario, the proposed development is expected to have a beneficial impact on the public open space.

A Solar Glare assessment has been submitted to analyse the impact on train drivers on the adjacent railway line. It concludes the potential risk associated with reflected glare is low which is in part due to the design of the building and the materiality of its largely terracotta facades which have a matte finish. Notwithstanding, the design details condition shall require the facing materials to demonstrate how they would avoid solar glare impact.

## Overshadowing

- 20.5 The Daylight and Sunlight Report submitted with the application includes a Sun Hours on Ground assessment has been undertaken which uses the BRE methodology to assess the overshadowing of open spaces. The BRE recommends at least half (50%) of the area should receive at least two hours (120 mins) of sunlight on the 21st March; if below that then the area which receives some sun on the 21st March should not be reduced to less than 0.8 times its former value.
- The figure below shows in yellow the area of the public realm that would receive at least two hours of sunlight on 21<sup>st</sup> March. The communal amenity space to the south of the development would comfortably receive at least 2 hours of sunlight on 21<sup>st</sup> March but the public open space located to the north would generally fall below. This is due to the development obstructing sunlight from the south when it is lower in the sky during the winter months. Additional analysis carried out on 21 June shows that all the external amenity spaces will receive very good amounts of sunlight in the summer months, which is when they will be used more frequently.

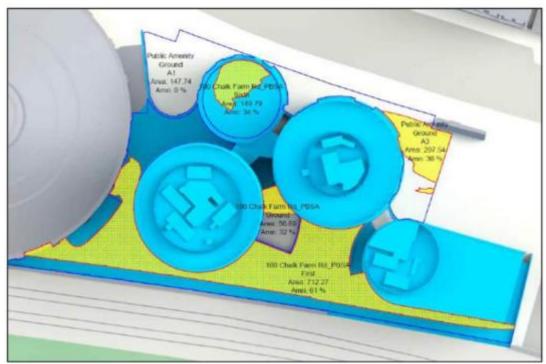


Figure 26 - public realm in yellow receiving at least two hours of sunlight on 21st March

- An assessment has been carried out on the public open space approved as part of the Camden Goods Yard development, known as St George Youth Space. Overshadowing of this area is inevitable given its position in front of the affordable housing building which obstructs sunlight from the south.
- 20.8 The assessment shows that no part of the amenity space would receive direct sunlight on 21<sup>st</sup> March when the sun is low in the sky, whilst on 21<sup>st</sup> June, 34% of the area would receive at least 2 hours of direct sunlight. As a comparison, the proposed development represents a 1% reduction in the area receiving two hours of direct sunlight compared to the previous permission (ref. 2013/5402/P) for the site.
- 20.9 There are no concerns with the impact of the proposed development on the surrounding microclimate and whilst there will be impacts, these are acceptable.

## 21. WATER, FLOOD RISK AND DRAINAGE

- 21.1 The development plan (CLP policy CC3 and LP policy SI12 and SI13) seeks to ensure development does not increase flood risk, reducing the risk of flooding where possible. Development should incorporate sustainable drainage systems (SUDS) and water efficiency measures.
- 21.2 In this case, the development incorporates include green roofs and sustainable drainage including permeable paving overlaying blue roofs,

below ground attenuation tanks, and tree pits. Indicative locations for water butts and tree pits have been provided.

- There are 3 flood zones for flooding by rivers and the sea as defined by the Environment Agency; Flood Zones 1, 2 and 3. These are based on the likelihood of an area flooding, with flood zone 1 areas least likely to flood and flood zone 3 areas more likely to flood.
- The site is located within Flood Zone 1. The site is located on a previously flooded street and is therefore considered at risk of flooding. Policy CC3 states that vulnerable development should not be located in flood prone areas. The proposed basement includes plant equipment which is considered vulnerable; however, due to the site levels which would rise slightly from Chalk Farm Road and water ingress is limited to only one point, it is considered unlikely that the basement would be prone to flooding. Notwithstanding, a condition is attached requiring a Flood Risk Emergency Plan (Condition 19).
- 21.5 A Flood Risk Assessment and a Below Ground Drainage Strategy have been submitted as part of this application. The submitted documents include proforma, drainage calculations, exceedance flow routes and maintenance tasks ownership. SUDS are proposed in order to manage the water environment on and around the site.
- The proposed attenuation features include green roofs, permeable paving overlaying blue roofs, below ground attenuation tanks and tree pits. In total, these will provide 276m3 attenuation capacity, helping to slow rainfall reaching sewers. Conditions are attached to secure full details of the SuDS and their proposed storage capacities. The information will be required to demonstrate that the system has been designed to accommodate all storms up to and including a 1:100 year storm with 40% provision for climate change as well as demonstrating a run off rate of 4l/s. A further condition requires evidence of installation.
- 21.7 Condition 48 will secure water efficiency measures, ensuring a maximum internal water use of 105 litres per day (plus an additional 5 litres for external water use) for each home.
- 21.8 The Lead Local Flood Authority is happy with the proposals subject to conditions on SUDS and water efficiency. Given the above, the proposed measures are considered acceptable in terms of flood risk.

## 22. TRANSPORT AND HIGHWAYS

22.1 Policies T1 and T2 of the CLP promote a move away from dependency on private motor vehicles, and a move to more sustainable modes of transport, supported by the right infrastructure and healthier environments. CLP policy

T3 protects transport infrastructure which is also a critical objective of the London Plan.

- The site is easily accessible by public transport with a Public Transport Accessibility Level (PTAL) rating of 6a (excellent). The closest London Underground stations are Chalk Farm and Camden Town, located approximately 180m to the west and 750m to the south-east of the site. Kentish Town West railway station, which provides London Overground services, is located approximately 750m northeast of the site. Several bus stops are provided along Chalk Farm Road, including a bus stop immediately adjacent to the site's frontage. These serve routes 1, 31, and 393. Bus stops on Ferdinand Street serve route 24.
- 22.3 The site is accessible from the Strategic Cycle Network with segregated cycle facilities on Chalk Farm Road, Haverstock Hill, and Prince of Wales Road.
- The segregated cycle lanes on Chalk Farm Road adjacent to the site connect into a wider provision of cycle lanes across the borough. The cycle route network will be further improved, and the Council will therefore seek to secure financial contributions towards this from nearby development.
- The nearest Santander cycle hire docking station is located on Castlehaven Road, approximately 500m east of the site. This provides 29 docking points for Santander bikes. Apart from this, the site is not well covered by the Santander cycle hire scheme.
- There are dedicated parking bays for dockless rental e-bikes and rental e-scooters in the area, namely on Hartland Road to the east and Eton College Road to the west of the site. However, these bays are already showing signs of overcapacity and increasing demand. The Council has plans to expand the network of bays in the area and will seek to secure financial contributions towards this from nearby development.

## Trip generation

- The trip generation predictions were calculated by referencing the information submitted with a planning application at nearby 17-37 William Road (ref. 2020/5473/P) for the redevelopment of existing buildings to provide a 239-bed student accommodation building and 1,338sqm of workspace. A sensitivity test was also conducted by a further interrogation of the TRICS database to obtain total person trip rates for student accommodation use for similar sites, and also for the proposed residential use.
- The Table 6.11 in the TA, which is reproduced here, presents the expected multi-modal trip generation of the car free development comprising the student accommodation, affordable housing, and the office space.

Mode	AM Peak Hour		PM Peak Hour			
	Arrive	Depart	Total	Arrive	Depart	Total
Underground / Train	12	11	24	9	15	24
Bus	3	9	11	8	5	13
Cycle	1	2	3	2	2	3
On foot	2	15	17	12	7	19
Total	18	37	55	31	29	60

Table 13 - predicted modal split of trips associated with proposed development

- The analysis shows a significant proportion of trips are expected to include active travel. Even if the office is poor quality and currently unoccupied, it could still be occupied so the baseline are the trips associated with that lawful use. However, to understand the perceived impact on neighbours given the period of vacancy, officers also considered the impact of the proposed development only. A technical note was provided later that identified an additional 12 taxi trips throughout the course of the day.
- 22.10 The anticipated walking trips are likely to be made from London Underground stations at Chalk Farm and Camden Town. Considering the increase in active travel to and from the site, the applicant will be requested to provide financial contributions towards the aforementioned Adelaide Road segregated cycle route corridor scheme, the Safe and Healthy Streets programme, and further public realm improvements for pedestrians and cyclists on Chalk Farm Road.
- 22.11 The Active Travel Zone (ATZ) assessment included in the Transport Assessment focuses on four routes to key destinations. The analysis shows mostly good walking and cycling conditions, with some beneficial improvements also possible.
- 22.12 The Council has already confirmed a range of highway improvement works on Chalk Farm Road immediately adjacent to the site, however, the applicant will also be asked to contribute financially towards public realm enhancements and active travel schemes discussed further in the report.

## Travel planning

A draft travel plan was 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. In line with TfL guidance, active travel targets should be set over a minimum five-year period, including at year one and year three. Modal share projections for walking and cycling will need to be in accordance with Camden's Transport Strategy and the Mayor's Transport Strategy.

22.14 A Travel Plan and associated monitoring and measures contribution of £11,348 would be secured by s106 agreement.

## Access and permeability

- 22.15 Pedestrian access to the site is from Chalk Farm Road. This section of highway benefits from a sufficient footway width, and also various 'Safe Travel' initiatives implemented by Council. These relate to the installation of the cycle lanes, a set-down bay for loading and taxi parking, and a bus stop with a refuge island. The scheme also proposes public realm improvements along the site frontage which will benefit pedestrians.
- 22.16 A car free development is proposed in accordance with Policy T2. The only vehicles potentially required to access the site would be for emergency services and substation maintenance. However, the Transport Assessment states that the likelihood of these 'could/should be zero' so any impacts would be negligible.
- 22.17 It was initially proposed to retain the existing crossover and introduce another vehicle access to the west of the site to enable access for a fire tender. However, considering that no vehicles would likely need to enter the site, it is suggested that the existing crossover is removed, and the footway reinstated to enhance the pedestrian and cycling environment; and also to remove the proposed second crossover. The applicant has agreed to these requests and the Highways contribution will cover the reinstatement of the footway. The applicant has been asked to consult 'Statutory guidance on Fire safety Requirement B5: Access and facilities for the fire service', to demonstrate how the development can be safely attended to in emergency, without the requirement for the crossovers.

## Cycle parking

- 22.18 The Council requires high quality cycle parking to be provided in accordance with Local Plan Policy T1, CPG Transport, the London Cycling Design Standards (LCDS), and London Plan Policy T5 for:
- 22.19 Food / retail (superseded A1 use class)
  - first 1000 sqm 1 space per 175 sqm, thereafter 1 space per 1000 sqm (GEA) long stay.
  - first 750 sqm 1 space per 20 sqm, thereafter 1 space per 150 sqm (GEA) short stay.
- 22.20 Business offices (superseded B1 use class)
  - 1 space per 75 sqm (GEA) long stay.
  - first 5,000 sqm 1 space per 500 sqm, thereafter 1 space per 5,000 sqm (GEA) short stay.

## 22.21 Permanent homes (C3 use class)

- 1 space per studio or 1 person 1 bedroom dwelling, 1.5 spaces per 2 person 1 bedroom dwelling, and 2 spaces per all other dwellings, long stay.
- 5 to 40 dwellings: 2 spaces, thereafter: 1 space per 40 dwellings short stay.

# 22.22 Student accommodation (Sui Generis)

- 0.75 spaces per bedroom long stay.
- 1 space per 40 bedrooms short stay.
- 22.23 The proposed development will provide cycle parking that meets and exceeds London Plan standards. For long stay the development is required to provide 199 spaces for the student accommodation, 58 for the affordable residential homes and 6 across the two commercial units (4 for the office and 2 for the café); and for short stay, 7 spaces for the student accommodation, 2 for affordable housing, 2 for office space and 17 for the café, equivalent to 14 Sheffield stands.
- Student accommodation and affordable housing will each have their own long stay cycle storage areas designed to accommodate 210 and 78 spaces respectively. The additional capacity over and above the policy requirement is welcomed. Both stores shall include a proportion of larger accessible spaces and a combination of Sheffield stands and two-tier stands in accordance with guidance in CPG Transport. The two commercial units will accommodate cycle parking within the premises, which were designed to ensure that they have sufficient space. The location of the cycle parking within the units will be subject to condition as it will depend on tenant fit-out.
- Thirty short stay cycle spaces will be provided throughout the new public realm and on the Chalk Farm Road footway via 15 Sheffield stands. These have been proposed in a location consistent with the existing provision and to avoid obstructing pedestrian movement. Any final agreed cycle parking on the highway would also normally be secured through a contribution securing these, so a bond to provide up to the maximum on the highway would be secured by s106 agreement. All final cycle parking details would be secured by condition.

## Car parking and vehicle access

- 22.26 The site is located in controlled parking zone CA-F(nw), which operates 08:30-23:00 Monday to Friday, 09:30-23:00 on Saturday, and 09:30-23:00 on Sunday.
- 22.27 The development is proposed car-free in line with Policy T2. This would be secured by Section 106 legal agreement.

- 22.28 Regarding disabled parking, London Plan Policy T6.5 'Non-residential disabled persons parking,' section A states: '...all non-residential elements should provide access to at least one on or off-street disabled persons parking bay.' Furthermore, lower case text in the London Plan Clause 10.6.23 recommends: 'All proposals should include an appropriate amount of Blue Badge parking, providing at least one space even if no general parking is provided.'
- 22.29 Paragraph 5.19 of the Camden Planning Guidance on Transport states: 'For all major developments the Council will expect that disabled car parking is accommodated on-site.' Paragraph 5.20 further informs: '...in any case the maximum distance Blue Badge holders should be expected to travel is 50 metres from the entrance to the site'. For the site, it is acknowledged that Chalk Farm London Underground station does not offer step free access.
- 22.30 Therefore, it is considered appropriate to seek an off-site contribution of £4,000 via Section 106 legal agreement for a disabled parking space to be provided on the public highway in a suitable location ideally within 50m from the site.
- 22.31 Officers expect the large majority of visitors to travel to the site by sustainable modes of transport. However, there is potential for some visitors with electric vehicles to drive to the site with a view to parking in an 'Electric Vehicles Only' parking bay in the controlled parking zone. The uptake of electric vehicles is increasing significantly, and there are many EV resident permit holders in the vicinity of the site. This would put pressure on infrastructure which has been provided primarily for local stakeholders. Officers therefore suggest that an additional electric vehicle charging point (fast charger) be provided on the public highway in the general vicinity of the site. A financial contribution of £20,000 would be secured by legal agreement in accordance with CPG Transport.

# Construction management

- 22.32 Construction management plans are used to demonstrate how developments will minimise impacts from the movement of goods and materials during the construction process (including any demolition works) in accordance with policies A1 and T4. A Construction Management Plan was submitted with the application. In absence of the appointed Principal Contractor for the project, this is a working document.
- 22.33 The applicant is requested to visit <u>LB Camden guidance on construction management</u>. Construction/Demolition Management Plan using the Council's CMP pro-forma in line with the guidance should be provided.
- 22.34 Traffic congestion is a significant problem in this part of the borough, particularly during peak periods but often throughout the day on Monday to Friday. The primary concern is public safety, but also the need to ensure that

construction traffic does not create (or add to existing) traffic congestion in the local area. The proposal is also likely to lead to a variety of amenity issues for local people (e.g., noise, vibration, air quality, temporary loss of parking, etc). 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. More detailed Demolition Management Plan (DMP) and Construction Management Plan (CMP) documents would therefore be secured by legal agreement in accordance with Local Plan Policy A1.

- 22.35 The Council will 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. Considering the proximity of several schools to the site, it will be necessary to restrict construction traffic to the hours of 9.30am and 3.00pm on weekdays.
- 22.36 The contractor will need to register the works with the Considerate Constructors' Scheme. The contractor will also need to adhere to the CLOCS standard for Construction Logistics and Community Safety.
- 22.37 The development will require significant input from officers at demolition and construction stage. This will relate to the development and assessment of the CMP as well as ongoing monitoring and enforcement of the DMP and CMP during demolition and construction.
- 22.38 Implementation support contributions of £30,513 and impact bonds of £32,000 for the demolition and construction phases of the development works would be secured by legal agreement in accordance with Policy A1.
- 22.39 The requirement to form a construction working group consisting of representatives from the local community prior to commencement of demolition or construction would be a requirement of the Section 106 CMP Head of Term.

## Deliveries and servicing

- 22.40 A draft Delivery and Servicing Plan (DSP) was submitted with the application. Servicing is proposed from the existing on-street bay located on Chalk Farm Road directly in front of the site. This bay is subject to the following new traffic orders:
  - the use of taxis only (stopping by all other vehicles prohibited) between the hours of Midnight – 7am, and 7pm – Midnight on Monday to Friday and between the hours of Midnight – 4am and 10am – Midnight on Saturday and Sunday,
  - loading / unloading by any vehicle outside of these hours (i.e. between 7am and 7pm on weekdays, and between 4am and 10am on weekends).

- 22.41 It is suggested that any out of hours deliveries could take place from a new loading bay on the opposite side of the road just prior to the junction with Crogsland Road, which can be accessed by the signalised pedestrian crossing adjacent to the Roundhouse. The previously submitted utilisation survey for the bay which is at present restricted to Loading Only between 10:00 12:00 and 14:00 16:00 and Pay by Phone parking bay between 08:30 10:00, 12:00 14:00 and 14:00 23:00, suggests plenty of availability to accommodate the servicing demand of 14 vehicle trips per day generated by the proposed development.
- The DSP encourages the use of the cargo bikes and such activity will be monitored via the reporting mechanisms within the Travel Plan. The Travel Plan will also identify further cargo bike capacity should additional demand arise in the future.
- 22.43 A detailed DSP would be secured by Section 106 legal agreement.

## Highway works

- 22.44 The applicant would be financially responsible for any works relating to changes or repairs to the highway. This concerns the request for the removal of the existing crossover on Chalk Farm Road, which will be retained until completion. The Council therefore seeks to secure a highways contribution to make any changes or repairs to the public highway in the direct vicinity of the development. This would be secured by Section 106 legal agreement
- 22.45 It is expected that significant damage to the public highway is unlikely to be caused during demolition and construction; however, a highways contribution of £50,000 be secured by legal agreement which will cover any damage and the removal of the crossover and reinstatement of the public highway

## Pedestrian, cycling and environmental improvement

- A significant increase in cycle and walking trips generated by the proposed development, and further promoted by the Travel Plan will put additional demand on the surrounding infrastructure. The Council's commitment to improve the cycling and pedestrian environment in the vicinity of the site will directly benefit the future residents, visitors and employees. A financial contribution of £400,000, which reflects the scale and impact of the development, will therefore be secured by Section 106 legal agreement towards the following improvement works:
  - the introduction of segregated cycle lanes in at least one direction (westbound/uphill), and potentially both, subject to available widths, on Adelaide Road segregated cycle corridor (primary route), which form part of a borough wide 'Healthy Routes - strategic cycling corridors' programme of works,

- the implementation of safe and healthy streets upgrades, including reductions in through-traffic and/or separated cycle facilities on Ferdinand Street, which is part of the Council's neighbourhood-based Safe and Healthy Streets programme,
- delivering further improvements to public realm on Chalk Farm Road, which will enhance pedestrian and cycling environment between the site and Camden Town.

## Micromobility improvements

22.47 Parking bays for dockless rental e-bikes and rental e-scooters are located nearby. However, these merely provide capacity for existing usage by residents and people who work in or visit the area. Officers anticipate significant demand for more parking bays to be provided in the area should planning permission be granted. A cycle/e-scooter hire improvements contribution of £10,000 will therefore be secured as a Section 106 planning obligation. This would allow the Council to provide additional capacity for the parking of dockless rental e-bikes and rental e-scooters in the local area by expanding existing bays and / or providing additional bays. Officers anticipate staff and visitors using these modes of transport as an alternative to public transport, especially when their primary mode of transport is rail with a secondary trip by micromobility vehicles.

# Safeguarding

- TfL has identified a long-term opportunity for an upgrade of Chalk Farm station including a relocated step-free station entrance in the vicinity of the Roundhouse. It is expected that were this provided within the red line boundary, or nearby, it would benefit future occupants of the development.
- This was not raised by TfL in response to consultation on the draft local plan and site allocation and this scheme was already far advanced before TfL raised this as a request. As such, whilst this will investigate the possibility of such access potentially being established on the site, it will take account of the proposed scheme, working within those constraints, and consider off-site alternatives. TfL acknowledge the ownership of the site and the development coming forward will be accounted for in any future negotiations if they are required.
- 22.50 As such, TfL seek a financial contribution of £50,000 towards a feasibility study. This would operate as a bond, and in the event the study does not materialise, the contribution would be repaid.

## Transport conclusion

22.51 The proposal is acceptable in terms of transport implications subject to the following conditions and planning obligations being secured by legal agreement:

- Travel Plan and associated monitoring and measures contribution of £11,348.
- Car-free development.
- Off-site contribution of £4,000 for a disabled parking space.
- Electric vehicle charging infrastructure (fast charger) contribution of £20,000.
- Construction management plan (CMP), and if necessary, a separate Demolition Management Plan (DMP), CMP implementation support contribution of £30,513, and CMP Impact Bond of £32,000.
- Requirement to form a construction working group consisting of representatives from the local community.
- Delivery and Servicing Plan.
- Highway works contribution of £50,000 to include removal of the existing crossover (if required).
- Pedestrian, Cycling and Environmental Improvements contribution £400,000.
- Micromobility improvements contribution of £10,000.
- Feasibility study contribution for new Chalk Farm Underground Station entrance of £50,000.

# 23. EMPLOYMENT AND TRAINING OPPORTUNITIES

23.1 The proposed development would generate increased employment opportunities during construction and operational phases. To ensure local people benefit from these opportunities in line with CLP policy E1, the following obligations have been negotiated and will be secured by Section 106 agreement.

# **During construction**

- Apprenticeships the applicant will be expected to recruit a construction apprentice, paid at least London Living Wage, for every £3million of build costs with a support fee of £1,700 per apprentice as per section 63 of the Employment sites and business premises CPG. Recruitment of construction apprentices should be conducted through the Council's Euston Skills Centre (moved to a new location hence a new name). With an estimated build cost of £60 million, this would be **20 construction apprentices** and a £34,000 support fee.
- 23.3 <u>Construction Work Experience Placements</u> the applicant will provide **12 construction work placement opportunities** of not less than 2 weeks, to be undertaken over the course of the development construction. This would be recruited through the Council's Euston Skills Centre, as per section 69 of CPG Employment sites and business premises.

- 23.4 <u>Local Recruitment</u> the applicant will work with the Euston Skills Centre to recruit to vacancies, targeting 20% local recruitment, advertising with Camden for no less than a week before the roles are advertised more widely.
- 23.5 <u>Local Procurement -</u> the applicant will also sign up to the Camden Local Procurement Code, as per section 61 of the Employment sites and business premises CPG. This sets a target of 10% of the total value of the construction contract, which aligns with the applicant's Employment and Training Strategy and its focus on the local area.

## Post construction

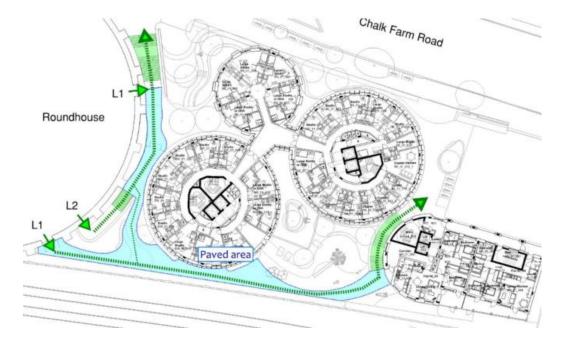
- There are a number of end-use employment opportunities associated with the scheme given the employment uses proposed, including the student accommodation. Based on the scale of the scheme and the number of total job opportunities, **2 apprenticeships** are sought on a 5-year rolling basis.
- 23.7 The developer is also encouraged to work with Camden Learning/STEAM on school engagement and with their commercial occupiers to offer work experience placements.
- 23.8 The developer has an existing 5-year partnership with the Roundhouse which began in Spring 2023. In their capacity as a sponsor, Regal have provided financial support to outreach programmes in the community with a focus on supporting young people, particularly those from under-represented backgrounds, to enter careers in the creative industries. Regal have also provided mentorship to emerging creative businesses via the Roundhouse's Accelerator Programme.
- 23.9 A post-construction employment and training plan, secured by s106, would cover ongoing engagement including partnership with Camden Learning, STEAM and the Roundhouse.
- 23.10 The above measures would be included in an enhanced package of Employment and Training measures secured by s106 agreement in accordance with CLP policy E1 and the CPG.

## 24. FIRE SAFETY

- 24.1 Policy D12 of the London Plan also requires the application to be accompanied by a fire statement, prepared by a suitably qualified third-party assessor. London Plan Policy D5 seeks to ensure that developments incorporate safe and dignified emergency evacuation for all building users.
- A Fire Statement has been submitted by an assessor with suitable qualifications. It covers the relevant Building Regulations requirements and provides information on how the proposal will comply. With regards to means of escape for disabled persons, at least one evacuation lift is to be provided

at each circulation core. Refuge points for disabled occupants will be provided at all above ground levels located within the lift lobby area and provided with emergency voice communication panel.

- 24.3 The buildings that make up the development are all 'relevant buildings' as they feature residential floors at a height greater than 18m above ground level. The application is therefore referrable to the Health and Safety Executive under Planning Gateway One. The application has been reviewed twice by HSE (the second review following revisions) who have confirmed they are content with the proposal in terms of fire safety design including the inclusion of a secondary stair in all buildings. It is noted that it will be for the applicant to demonstrate compliance with the submitted fire statement at later regulatory stages outside of the planning process.
- 24.4 The access to the buildings on the site would be directly off Chalk Farm Road for fire vehicles one access point next to the Roundhouse and the other to the east on the other side of the front tower. This would provide direct access to all blocks.
- The submitted Fire Statement, compliance with which will be secured by condition (Condition 42), also covers future provisions for escape from the Roundhouse as the site currently features escape routes from the Roundhouse across the site. As shown on the diagram below, L1 exit closest to Chalk Farm Road will remain the same as the existing condition. The L2 exit will be provided with a new external stair that discharges onto the new podium area at First floor, with onward escape via either the external Roundhouse stair or new external stair in the proposed development. The L1 exit at the rear of the site will discharge directly onto the new podium area with onward escape via paved routes to either the Roundhouse external stair or to the new external stair.



24.6 Subject to compliance with the Fire Statement, and the subsequent Fire Gateways, the scheme complies with the development plan.

## 25. SAFETY AND SECURITY

- 25.1 Camden Local Plan policy C5 and CPG Design are relevant with regards to secure by design. Policy C5 requires developments to demonstrate that they have incorporated design principles which contribute to community safety and security, particularly in wards with relatively high levels of crime, of which Camden Town is one.
- Currently the site is a blank frontage comprising a solid high wall with no openings onto it. The proposed scheme would open the site up and significantly improve natural surveillance. A Student Management Plan (SMP), a draft of which has been provided, will cover safety and security issues relating to the PBSA building and surrounding public realm and a full SMP will be secured by Section 106. A Public Realm Management Plan will also cover the interaction between the uses at the site and the neighbours, as covered in the Public Open Space section of the report.
- The Designing Out Crime officer was consulted by the Council at preapplication stage and following submission. In addition, the officer has attended meetings with the developer and their design team. The officer raises no objection to the proposal, subject to conditions, but does raise a number of useful observations and recommendations for the applicant to take account of going forward. These include advice on site management, landscaping and security rated design to mitigate anti-social behaviour and theft. He requests a condition that requires details of how the scheme will achieve secured by design accreditation at a silver level to be approved in consultation with the Designing Out Crime Officer.
- The officer raised the issue of the section of retained wall which he cautions will be used as a public toilet especially at night. The wall straddles the ownership of the applicant and the neighbouring landowner St George, but there is agreement from both parties that this could be removed under a future planning application. This would improve sight lines across the site and is a move that would be supported in principle by officers (also see Heritage section).
- There has been ongoing engagement and collaboration with the Roundhouse which has shaped the design of the scheme, particularly with regards to the public realm and how it interfaces with the operation of the Roundhouse. As covered in the Public Open Space section, a Public Realm Management plan will be secured by s106 which will need to be produced in consultation with the Roundhouse as it will cover such measures as how

crowds will be managed (particularly during Roundhouse events) and issues like ASB are resolved. It will also cover maintenance arrangements to ensure the new public realm remains attractive and safe. It will also deal with any safety and security issues that may arise from the open space on the PFS site, and the developer has been in discussions with St George about taking on the day-to-day management of that space.

## 26. REFUSE AND RECYCLING

- 26.1 Policy CC5 and CPG 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.
- The proposal includes separate bin stores for each use, with storage at the basement level for the student accommodation and at ground floor for the affordable housing. On collection days, the refuse will be moved from the stores by on-site maintenance team to a temporary area at ground floor level for collection. The bin stores are a sufficient size to accommodate the bin capacity required, with further details secured by condition.

# 27. PLANNING OBLIGATIONS

27.1 The following contributions are required to mitigate the impact of the development upon the local area, including on local services. These heads of terms would mitigate any impact of the proposal on the infrastructure of the area.

Contribution	Amount (£)	
Affordable housing (C3) - 30 units	N/A	
Affordable student housing - 24 rooms	N/A	
Early stage review (if not implemented within two years)	N/A	
Nominations Agreement with HE institution	N/A	
Car free	N/A	
Pedestrian, cycling and environmental contributions	£400,000	
Highways contribution (including removal of crossover)	£50,000	
Provision of on-street disabled parking bay	£4,000	
On-street cycle parking bond	£TBC	
Electric vehicle charging point	£20,000	
Cycle hire/e-scooter contributions	£10,000	
Health infrastructure financial contribution	£TBC	
CMP and DMP	N/A	
CMP and DMP monitoring fee	£30,513	
CMP and DMP bond	£32,000	
Construction Working Group	N/A	
Delivery and Servicing Plan	N/A	
Travel Plan	N/A	
Travel Plan Monitoring and Measures Contribution	£11,348	
Feasibility study contribution to TfL relating to new entrance	£50,000	
to Chalk Farm Station		
Energy and sustainability plans including BREEAM targets	N/A	

Future proofing to link to a district heating network	N/A
Carbon off-set fund	£119,386
20 construction apprenticeships through the Euston Skills	N/A
Centre	
Apprenticeships support fee	£34,000
12 construction work placement opportunities through the	N/A
Euston Skills Centre	
Local employment	N/A
Local Procurement	N/A
Two end use work apprenticeships	N/A
Post construction employment and training	N/A
Agent of Change	N/A
Open space contribution	£635,688
Public Realm Management Plan prepared in consultation with	N/A
neighbouring landowners	
Loss of employment floorspace contribution	£139,825
Student Management Plan	N/A
Non-student Management Plan (for outside of term time)	N/A
Basement Construction Plan	N/A
Retention of architect	N/A
TOTAL	£ 1,536,760

Table 14 - S106 planning obligations summary

# 28. COMMUNITY INFRASTRUCTURE LEVY (CIL)

The development would be eligible for both Camden CIL and the Mayor of London's Community Infrastructure Levy (CIL) as it involves student housing and commercial space. Neither CIL is payable on the development of affordable housing.

## 29. CONCLUSION – PLANNING APPLICATION

- 29.1 The proposals would deliver approx. 13,200 sqm (GIA) floorspace (an uplift of c.10,000 sqm) in a highly accessible Town Centre location and an area where significant growth is encouraged by CLP policy G1.
- Alternative approaches to demolition were explored including retention and retrofit and retention and extension; however, both options deliver considerably less floorspace than the demolition and rebuild approach. Further, a demolition and rebuild approach is found to deliver on the aims and objectives of the development plan as a whole, including the provision of a mix of sought after uses, superior design quality and improvements to the public realm and the site's engagement with the street and wider town centre.
- 29.3 The uses comprise self-contained affordable housing, student accommodation together with ground floor level commercial space. This is a combination of sought after uses that are well-suited to their location. There is a recognised need in policy for housing with both self-contained and

student accommodation being subject to targets at a Local Plan and London Plan level. All the self-contained housing would be affordable, the delivery of which is crucial to creating mixed and sustainable communities. The uses are consistent with those identified in the draft Site Allocation for the site (C9).

- The proposal does entail a loss of office floor space without evidence that the site is no longer suitable for office use and therefore conflicts with CLP policy E2. However, when taken together with the neighbouring PFS site, which is an approach supported by the draft Site Allocations, a range of commercial / office spaces together with self-contained housing provision would be provided across the two sites.
- 29.5 Officers have identified less than substantial harm to the setting of the Grade II\* listed Roundhouse, arising from the increase in height and massing in close proximity, as well as the Regent's Canal Conservation Area due to the demolition of the solid wall and its association with the former railway lands, the increase in scale close to the Roundhouse, and in part due to the appearance of the affordable housing block as a linear block. The harm has been given considerable importance and weight. There are however significant public benefits, which include heritage benefits, arising from the scheme that outweigh that harm. Addressing the heritage benefits first, the proposal would remove low-rise post-war block attached to the Roundhouse which would in turn better reveal this side of the Roundhouse as appreciated from the street. The landscaping works will allow more permeability and further enhance the appreciation of the Roundhouse from some near views. The proposal also supports the relocation and restoration of the grade II listed cattle trough located in front of the site. Its restoration and incorporation into the scheme should ensure its longevity and allow for its removal from the Heritage At Risk register, and although subject to a separate application, is secured and linked to this application by conditions.
- 29.6 Wider public benefits associated with the scheme include the affordable housing provision and the student housing that will meet a demand and help release existing housing stock for general needs. The provision of housing has been given significant weight, as has the affordable housing provision. The scheme represents a significant improvement in transport terms, removing an on-site car park and introducing a level of cycle parking for a range of users that exceeds policy requirements. Significant contributions have been secured for transport and infrastructure improvements, including a significant PCE contribution and funding to enable a feasibility study into step free access for Chalk Farm Road Station. The scheme will also deliver employment and training opportunities, including 20 apprentices and 12 work placement opportunities during the construction phase apprenticeships on a 5-year rolling basis during the operational stage. The scheme also secures the Roundhouse Outreach Programme, and financial

contributions to help support these employment and training opportunities will also be secured. The scheme will also deliver a co-ordinated approach to management of the public spaces between the PFS site and the Roundhouse.

## 30. CONCLUSION – LISTED BUILDING CONSENT

30.1 The alterations to the listed buildings on the site are minor and associated with the removal of the party wall condition between the Roundhouse and the existing building. Non-original steel beams would be removed and the brickwork would be repaired. Subject to conditions, the listed building consent application is considered acceptable.

## 31. RECOMMENDATIONS

- Planning Permission is recommended subject to conditions and a Section 106 Legal Agreement covering the aforementioned Heads of Terms.
- 31.2 Listed building consent is recommended subject to conditions.

# 32. LEGAL COMMENTS

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

#### 33. CONDITIONS – PLANNING PERMISSION

#### Standard conditions

# 1 Three years from the date of this permission

This development must be begun not later than three years from the date of this permission.

Reason: In order to comply with the provisions of Section 92 of the Town and Country Planning Act 1990 (as amended).

# 2 Approved drawings

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

# **Existing Drawings:**

356\_P10.001 A; 356\_P10.002 A; 356\_P10.050 A; 356\_P10.099 A; 356\_P10.100A; 356\_P10.101 A; 356\_P10.102 A; 356\_P10.103 A; 356\_P10.104 A; 356\_P10.106 A; 356\_P10.200 A; 356\_P10.201 A; 356\_P10.202 A; 356\_P10.203 A; 356\_P10.204 A; 356\_P10.205 A; 356\_P10.206 A

# **Demolition Drawings:**

356\_P10.250 A; 356\_P10.299 A; 356\_P10.300 A; 356\_P10.301 A; 356\_P10.302 A; 356\_P10.303 A; 356\_P10.304 A; 356\_P10.305 A; 356\_P10.400 A; 356\_P10.401 A; 356\_P10.402 A; 356\_P10.403 A; 356\_P10.404 A; 356\_P10.500 A; 356\_P10.501 A

# **Proposed Drawings:**

356\_P20.129 C; 356\_P20.130 C; 356\_P20.131 C; 356\_P20.132 C; 356\_P20.133 C; 356\_P20.134 C; 356\_P20.135 C; 356\_P20.136 C; 356\_P20.137 C; 356\_P20.138 C; 356\_P20.139 C; 356\_P20.140 C; 356\_P20.142 C; 356\_P20.143 C; 356\_P30.120 C; 356\_P30.121 C; 356\_P30.122 C; 356\_P30.123 C; 356\_P40.110 B; 356\_P40.111 B; 356\_P40.112 B; 356\_P40.113 B; 356\_P20.160 I; 356\_P20.161 I; 356\_P20.162 I; 356\_P20.164 I; 356\_P20.167I; 356\_P20.169 I; 356\_P20.170 I; 356\_P20.171I; 356\_P20.172 I; 356\_P30.130 E; 356\_P30.131 E; 356\_P30.132 E; 356\_P30.133 E; 356\_P40.120 C; 356\_P40.121 D; 356\_P40.200A; 356\_P40.201A; 356\_P40.202 A; 356\_P50.001 B; 356\_P50.002 B; 356\_P50.003 B; 356\_P50.005 B

## Documents:

Arboricultural Impact Assessment prepared by Tim Moya Associates ref. 220952-PD-11a (dated January 2024); Affordable Housing Statement prepared by Gerald Eve, dated February 2024; Air Quality Assessment prepared by Air Quality Consultants, ref. J10/14846A/102/F4, dated July 2024; Desk Based Archaeology Assessment Rev 03, prepared by Mola, dated January 2024; Basement Impact Assessment, prepared by Pell Frischmann ref.f106885-PF-ZZ-XX-RP-C-0005 Rev P02, dated January 2024; Biodiversity Impact Assessment prepared by Ecology by Design ref. EBD02653 Rev 01, dated January 2024; Construction Management Plan prepared by Regal ref. 1130 Feb 2024 - Rev 2, dated February 2024; Circular Economy Statement, prepared by Whitecode, ref 11494-WCL-ZZ-ZZ-RP-Y-0005,

dated Rev 04July 2024; Daylight and Sunlight Report prepared by Consil. dated January 2024; Daylight and Sunlight Addendum Letter prepared by Consil. Dated May 2024; Design and Access Statement prepared by DSDHA, dated February 2024 Design and Access Statement Addendum prepared by DSDHA, dated June 2024; Delivery and Servicing Plan prepared by Iceni, dated January 2024; Ecological Impact Assessment prepared by Ecology by Design, dated February 2024; Energy Statement prepared by Whitecode, ref. 11494-WCL-ZZ-ZZ-RP-SS-0001 Rev P03, dated August 2024; Fire Strategy and Gateway 1 Form prepared by Ashton Fire ref. AF3230 Rev 02, dated June 2024; Flood Risk Assessment prepared by Pell Frischmann ref.106885-PEF-ZZ-XX-RP-YE-000010 Rev P04, dated April 2024; Framework Travel Plan prepared by Iceni, dated January 2024; Health Impact Assessment prepared by Volterra, dated January 2024; Heritage Engineering Report prepared by Pell Frischmann ref.106885-PF-ZZ-XX-RP-S-0006 Rev 03, dated January 2024; Heritage, Townscape, Visual Statement (HTVS) prepared by Turley, dated February 2024; Heritage, Townscape, Visual Statement (HTVS) Addendum Note prepared by Turley, dated May 2024; Land Contamination Desk Study, prepared by Pell Frischmann ref. 106885-PEF-XX-XX-RP-GG-600001\_P02, dated February 2024; Noise and Vibration Report, prepared by Sandy Brown ref. 22483-R03-Rev C, dated February 2024; Overheating Assessment prepared by Whitecode ref. 11494-WCL-ZZ-ZZ-RP-SS-0003 Rev P01, dated May 2024; Planning Statement prepared by Gerald Eve, dated February 2024; Planning Addendum Covering Letter prepared by Gerald Eve, dated May 2024; Retention and Retrofit Report prepared by DSDHA, dated February 2024; Regeneration Statement prepared by Volterra, dated January 2024; Solar Glare Report prepared by Consil, dated January 2024; Structural Engineering Report prepared by Pell Frischmann ref. 106885-PF-ZZ-XX-RP-S-0005 Rev 03, dated May 2024; Student Housing Management Plan prepared by CRM, dated January 2024; Sustainable Drainage Report prepared by Pell Frischmann ref. 106885-PEF-ZZ-XX-RP-CD-000001 Rev P04, dated April 2024; Sustainability Statement (and BREEAM Pre-Assessment) prepared by Whitecode ref.11494-WCL-ZZ-ZZ-RP-Y-1-002 Rev 01, dated May 2024; Transport Assessment prepared by Iceni, dated February 2024; Transportation Technical Note prepared by Iceni, dated May 2024; Wind Microclimate Assessment prepared by GIA ref. 19066 Rev 02, dated May 2024; Whole Life Carbon Assessment prepared by Whitecode ref. 11494-WCL-ZZ-ZZ-RP-Y-1-004 Rev 1, dated May 2024

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

## Pre-start conditions (any works)

## 3 Air quality monitoring

No development, demolition, or site clearance shall commence until all the following have been complied with:

- a) Prior to installing monitors, full details of the air quality monitors have been submitted to and approved in writing by the local planning authority. Such details shall include the location, number and specification of the monitors, including evidence of the fact that they will be installed in line with guidance outlined in the GLA's Control of Dust and Emissions during Construction and Demolition Supplementary Planning Guidance;
- b) A confirmation email should be sent to airquality@camden.gov.uk no later than one day after the monitors have been installed with photographic evidence in line with the approved details; and

c) Prior to commencement, a baseline monitoring report including evidence that the monitors have been in place and recording valid air quality data for at least 3 months prior to the proposed implementation date shall be submitted to the Local Planning Authority and approved in writing.

The monitors shall be retained and maintained on site in the locations agreed with the local planning authority for the duration of the development works, monthly summary reports and automatic notification of any exceedances provided in accordance with the details thus approved. Any changes to the monitoring arrangements must be submitted to the Local Planning Authority and approved in writing.

Reason: Development must not commence before this condition is discharged to manage and mitigate the impact of the development on the air quality and dust emissions in the area, and London as a whole, and to avoid irreversible and unacceptable damage to the environment, in accordance with policies A1, A4 and CC4 of the Camden Local Plan 2017 and policy SI1 of the London Plan.

# 4 Tree protection

No development, demolition, or site clearance shall commence until the appropriate tree protection measures have been installed and working practices adopted in accordance with the document entitled "100 Chalk Farm Road Arboricultural Impact Assessment" by TMA Environmental Consultants dated January 2024 ref. 220952-PD-11a. All trees on the site, or parts of trees growing from adjoining sites, unless shown on the permitted drawings as being removed, shall be retained and protected from damage in accordance with BS5837:2012 and with the approved protection details. The development shall be monitored by the project arboriculturalist in accordance with the approved report.

Reason: To ensure that the development will not have an adverse effect on existing trees and in order to maintain the character and amenity of the area in accordance with the requirements of policies A2 and A3 of the Camden Local Plan"

# **Pre-start conditions (other than demolition or site clearance)**

## **5** London Underground Infrastructure Protection

No development shall commence (other than demolition, site clearance and preparation), until detailed design and method statements and load calculations (in consultation with TfL Infrastructure Protection), have been submitted to and approved in writing by the local planning authority. The details shall include:

- a) demolition details;
- b) Site specific Risk Assessments and Method Statements (RAMS) to be agreed with TfL Engineering for each stage of the development for any activities temporary or permanent (e.g. groundworks, excavations, piling, etc.) The RAMS should be issued a minimum of 6 weeks prior to the individual activity commencing;
- c) details of any changes in loading to London Underground's infrastructure due to works including temporary works are to be issued to TfL Engineering Infrastructure Protection for review and comment/approval;

d) details on the erection and use of tall plant (e.g. tower cranes, mobile cranes and piling rigs) prior to commencement of works accommodate ground movement arising from the construction thereof; and

e) mitigation for the effects of noise and vibration arising from the adjoining operations within the structures and tunnels- No claims to be made against TfL or London Underground by the Local Authority, developer or tenants for any noise or vibration resulting from London Underground running, operating and maintaining the adjacent railway.

The development shall thereafter be carried out in accordance with the approved design and method statements, and all structures and works shall be completed in accordance with the approved details 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 policy T3 of the London Borough of Camden Local Plan 2017.

#### 6 Land contamination

Prior to commencement of development (other than demolition, site clearance and preparation), a written programme of ground investigation for the presence of soil and groundwater contamination and landfill gas should be submitted to and approved in writing by the local planning authority.

The site investigation shall be carried out in accordance with the approved programme and the results and a written scheme of remediation measures (if necessary as a result of the investigation) shall be submitted to and approved by the local planning authority in writing.

The remediation measures shall be implemented strictly in accordance with the approved scheme and a written report detailing the remediation shall be submitted to and approved by the local planning authority in writing prior to occupation.

Reason: To ensure the risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other receptors, in accordance with policies D1, A1, and C1 of the London Borough of Camden Local Plan 2017.

# 7 Suitable qualified engineer

The development hereby approved shall not commence (other than demolition, site clearance and preparation), until such time as a suitably qualified chartered engineer with membership of the appropriate professional body has been appointed to inspect, approve and monitor the critical elements of both permanent and temporary basement construction works throughout their duration to ensure compliance with the design which has been checked and approved by a building control body. Details of the appointment and the appointee's responsibilities shall be submitted to and approved in writing by the local planning authority prior to the commencement of development. Any subsequent change or reappointment shall be confirmed forthwith for the duration of the construction works.

Reason: To safeguard the appearance and structural stability of neighbouring buildings and the character of the immediate area in accordance with the requirements of policies D1, D2 and A5 of the London Borough of Camden Local Plan 2017.

# 8 Waste Water Heat Recovery:

Prior to commencement of development (other than demolition, site clearance and preparation), a feasibility assessment into wastewater heat recovery with the aim of maximising the energy efficiency of the development should be submitted to the local planning authority and approved in writing. The buildings shall not be occupied until the approved details have been implemented and these works shall be permanently retained and maintained thereafter.

Reason: To ensure the development contributes to minimising the effects of, and can adapt to a changing climate in accordance with policies CC1 and CC2 of the London Borough of Camden Local Plan 2017.

# 9 Rainwater/ greywater harvesting:

Prior to commencement of development (other than demolition, site clearance and preparation), a feasibility assessment for rainwater/greywater recycling should be submitted to and approved in writing by the local planning authority. If considered feasible, details shall be submitted to the local authority and approved in writing. The development shall thereafter be constructed in accordance with the approved details.

Reason: To ensure the development contributes to minimising the need for further water infrastructure in an area of water stress in accordance with policies CC2 and CC3 of the London Borough of Camden Local plan 2017 and Policy SI 13 of the London Plan 2021.

## 10 Protection, relocation and restoration of cattle trough

Prior to commencement of development (other than demolition, site clearance and preparation), details of the following shall be submitted to and approved in writing by the local planning authority:

- a) how the listed trough will be protected during construction work,
- b) the relocation and works of remediation, cleaning and repair of the cattle trough (to align with a separate listed building consent), and
- c) a programme for the works and submission of the Lised Building Consent.

The trough shall be retained and protected from damage in accordance with the approved details, and the works of relocation, cleaning and repair shall be undertaken in accordance with the details and approved programme.

Reason: To secure the protection, preservation and restoration of the trough, ensure proper design and integration into the public realm, and to safeguard the character and appearance of the wider Conservation Area in accordance with the requirements of Policies D1 and D2 of the Camden Local Plan 2017.

# 11 Piling Method statement

Prior to commencement of any development (other than demolition, site clearance and preparation), a detailed design and method statements (in consultation with Thames Water) shall be submitted to and approved in writing by the local planning authority which:

Provide details of below ground works.

Identify Thames Water subsurface water infrastructure.

Details of any changes in loading to Thames Water infrastructure considering sequence of temporary and permanent works.

Provide staged ground movement impact assessment arising from temporary works and permanent works during demolition and construction stages to be undertaken.

Accommodate any ground movement arising from the development construction thereof.

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 Thames Water infrastructure, in accordance with policy T3 of the London Borough of Camden Local Plan 2017.

# 12 Archaeology

No below ground demolition or construction shall take place until a written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no below ground demolition or any construction shall take place other than in accordance with the agreed WSI, which shall include the statement of significance and research objectives, and

- A. The programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works
- B. Where appropriate, details of a programme for delivering related positive public benefits
- C. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI.

Reason: Development must not commence before this condition is discharged to safeguard the heritage of the borough by ensuring that any archaeological remains on site are not permanently destroyed, in accordance with policy D2 of the Camden Local Plan 2017.

## 13 SuDS - Further details

Prior to commencement of any development (other than demolition, site clearance and preparation), full details of the sustainable drainage system including water butts, tree pits, rain gardens where feasible, 433m2 blue roof (permeable paving) with 57m3 storage capacity, 101m3 western cellular storage tank, and 118m3 eastern cellular storage tank, shall be submitted to and approved in writing by the local planning authority. Such a system should be designed 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 shall demonstrate the run off rate of 4l/s approved by the Local Planning Authority. A revised drainage statement, SuDS pro-forma and supporting evidence should be included with the following information:

- The proposed SuDS or drainage measures including storage capacities
- The proposed surface water discharge rates or volumes
- The existing surface water discharge rates and volumes
- Confirmation of sufficient sewer capacity from Thames Water

Details shall include a lifetime maintenance plan, and systems shall thereafter be retained and maintained in accordance with the approved details.

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.

# Prior to above ground works

# 14 Detailed drawings and samples - student accommodation

Prior to commencement of above ground works (other than demolition, site clearance and preparation), detailed drawings, or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the local planning authority:

- a) Details, including plans, coloured elevations and sections at 1:20 of all new typical facade junctions (including at ground level, window / external door head and cill, and at junction with roof). To include any ventilation grills, screening, balustrades, parapets, gates, planters and associated elements and lighting fixtures;
- b) Detailed plans, coloured elevation and section drawings, including fascia, cornice, pilasters and glazing panels of the new shopfronts at a scale of 1:20;
- c) Bay study drawings, including plans, coloured elevations and sections at 1:50 of all typical façade types.
- d) Details, including plans of coloured elevations and sections at 1:20 of all cladding and façade treatment/louvres to any mechanical plant or machinery enclosures at roof terrace levels:
- e) Manufacturer's specification details, including high resolution photographs, of all facing materials (to be submitted to the Local Planning Authority) and samples at a minimum of  $0.5 \text{m} \times 0.5 \text{m}$  of those materials (to be provided on site). The details shall demonstrate how solar glare impact will be mitigated.
- f) Sample panel(s) of typical sections of the façade at 1:1 scale (minimum  $2m \times 2m$  in size) of each façade material including a glazed opening, showing reveal and header detail and neighbouring facing materials. To include reclaimed bricks proposed to be used at lower levels. To be installed on site for review, or at alternative pre-arranged location if necessitated by construction methodology.

g) Detailed drawings of gates, railings, doors and louvres on all parts of buildings which face the public realm.

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

Reason: To safeguard the appearance of the buildings and the character and appearance of the wider area and mitigate solar glare in accordance with the requirements of Policies A1, D1 and D2 of the Camden Local Plan 2017.

# 15 Detailed drawings/samples - affordable housing building

Prior to commencement of above ground works (other than demolition, site clearance and preparation), detailed drawings, or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the local planning authority:

- a) Details, including plans, coloured elevations and sections at 1:20 of all new typical facade junctions (including at ground level, window / external door head and cill, and at junction with roof). To include any ventilation grills, screening, balustrades, parapets, gates, planters and associated elements and lighting fixtures;
- b) Bay study drawings, including plans, coloured elevations and sections at 1:50 of all typical façade types.
- c) Details, including plans of coloured elevations and sections at 1:20 of all cladding and façade treatment/louvres to any mechanical plant or machinery enclosures at roof terrace levels;
- d) Manufacturer's specification details, including high resolution photographs, of all facing materials (to be submitted to the Local Planning Authority) and samples at a minimum of 0.5m x 0.5m of those materials (to be provided on site). The details shall demonstrate how solar glare impact will be mitigated.
- e) Sample panel(s) of typical sections of the façade at 1:1 scale (minimum 2m x 2m in size) of each façade material including a glazed opening, showing reveal and header detail and neighbouring facing materials. To be installed on site for review, or at alternative pre-arranged location if necessitated by construction methodology.
- f) Detailed drawings of gates, railings, doors and louvres on all parts of buildings which face the public realm.

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

Reason: In order to safeguard the appearance of the buildings and the character and appearance of the wider area and mitigate solar glare in accordance with the requirements of Policies A1, D1 and D2 of the Camden Local Plan 2017.

#### 16 Mechanical ventilation

Prior to commencement of above ground works (other than demolition, site clearance and preparation), full details of the mechanical ventilation system including air inlet locations shall be submitted to and approved by the local planning authority in writing. Air inlet locations should be located away from busy roads,

railways and the emergency generator flue or any other emission sources and as close to roof level as possible, to protect internal air quality. The development shall thereafter be constructed and maintained in accordance with the approved details.

Reason: To protect the amenity of residents in accordance with London Borough of Camden Local Plan Policy CC4 and London Plan policy SI 1.

# 17 Cycle parking

Prior to commencement of above ground works (other than demolition, site clearance and preparation), full details of the long-stay and short-stay cycle parking facilities, including accessible and cargo bike provision, shall be submitted to and approved in writing by the local planning authority.

The approved cycle parking facilities shall thereafter be provided in their entirety prior to the occupation of the relevant part of the development and shall thereafter be retained.

Reason: To ensure the scheme makes adequate provision for cycle users in accordance with policies T1 and T2 of the London Borough of Camden Local Plan 2017.:

# 18 Living roofs

Prior to commencement of above ground works (other than demolition, site clearance and preparation), full details in respect of the biodiverse intensive green roofs, to include the areas underneath the solar PV panels, shall be submitted to and approved in writing by the local planning authority. The design of the green roofs should follow the definition of Biodiverse Green roof in the GRO Green Roof Code 2021, and details submitted shall include the following:

- a) maintenance plan;
- b) a section at a scale of 1:20 showing a minimum of 150mm substrate depth for storage;
- c) a planting schedule including species and planting density; and
- d) other habitat features to be included.

The development shall be carried out in accordance with the details approved and shall be fully implemented before the premises are first occupied.

Reason: To ensure the development is sustainable and promotes biodiversity in line with Camden Local Plan policies CC1, CC3 and A3.

## 19 Flood protection

Prior to commencement of above ground works (other than demolition, site clearance and preparation), to minimise flood risk through flood protection measures (including specifically the vulnerable plant in the basement,) a Flood Risk Emergency Plan should be submitted to and approved in writing by the local planning authority. The plan shall be prepared in accordance with the aims and objectives of the ADEPT/Environment Agency Flood Risk Emergency Plans for New Development guidance. The development shall thereafter be constructed in accordance with the approved details.

Reason: To protect the occupants in the event of a flood in accordance with policy CC3 of the London Borough of Camden Local Plan 2017.

## 20 Sound insulation and noise protection

Prior to above ground works (other than demolition, site clearance and preparation), details shall be submitted to and approved in writing by the Council, of the sound insulation and vibration protection measures in the buildings, both for the student living accommodation and the housing block approved. Details shall demonstrate:

- a.) that the design and structure of the development shall be of such a standard that all rooms within the flats are not exposed to levels indoors of more than 35 dB LAeq 16 hrs daytime (07:00 to 23:00 hours) and more than 30 dB LAeq 8 hrs at night (23:00 to 07:00 hours the next day).
- b.) that the sound insulation ensures that noise levels in the 63Hz and 125Hz octave centre frequency bands (Leq) should be controlled so as not to exceed 47dB and 41dB (Leq) respectively in bedrooms, and 51dB and 46dB (Leq) respectively within other habitable rooms.
- c.) that the vibration dose values do not exceed 0.4m/s1.75 between 07.00 and 23.00 hours, and 0.26m/s1.75 between 23.00 and 07.00 hours, as calculated in accordance with BS 6472-1:2008, entitled "Guide to Evaluation of Human Exposure to Vibration in Buildings", [1Hz to 80Hz].

The approved details shall be implemented prior to occupation of the development and thereafter be permanently retained. The building and abatement measures as implemented shall ensure music noise levels in the 63Hz and 125Hz octave centre frequency bands (Leq) from any entertainment premises do not to exceed 47dB and 41dB (Leq) respectively in bedrooms, and 51dB and 46dB (Leq) respectively within other habitable rooms.

Reason: To ensure that the amenity of future occupiers of the development are not adversely affected by noise and vibration from nearby entertainment venues, mechanical installations, rail and traffic, and to protect the long term viability and operation of music venues in the area, in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.

## 21 Landscaping

Prior to commencement of above ground works (other than demolition, site clearance and preparation), details of hard and soft landscaping and means of enclosure of all un-built, open areas and a timetable for implementation, shall be submitted to and approved in writing by the local planning authority. The details shall include tree planting schedule (including replacement trees) including species and tree pit sizes, any proposed earthworks including grading, mounding and other changes in ground levels. The development shall be carried out in accordance with the approved details and timetable.

Reason: To ensure that the landscaping is carried out within a reasonable period and to maintain a high quality of visual amenity in the scheme in accordance with the requirements of policies A2, A3, A5 D1 and D2 of the London Borough of Camden Local Plan 2017.

## 22 Bird and bat boxes

Prior to commencement of above ground works (other than demolition, site clearance and preparation), details of the location of the following should be submitted to and approved in writing by the Local Planning Authority:

- Details of the locations of six nest boxes suitable for black redstarts to be positioned in association with the biodiverse intensive green roofs.
- Details of location of six swift nesting boxes and six bat boxes to be incorporated into the fabric of the building.

The boxes shall be installed in accordance with the approved plans prior to the occupation of the development and thereafter permanently retained.

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

#### 23 Solar PV

Prior to commencement of above ground works (other than demolition, site clearance and preparation), drawings, overshadowing assessment and data sheets aiming to maximise the provision of solar photovoltaics by showing the location, extent and energy generation capacity (at least 30.4kWp) and associated equipment to be installed on the building shall have been submitted to and approved by the Local Planning Authority in writing. The measures shall include the installation of a meter to monitor the energy output from the approved renewable energy systems. A site-specific lifetime maintenance schedule for each system, including safe roof access arrangements, shall be provided. The cells shall be installed in full accordance with the details approved by the Local Planning Authority and permanently retained and maintained thereafter.

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

# 24 Play space

Prior to commencement of above ground works (other than demolition, site clearance and preparation), details of an inclusive play strategy, including specifications of play equipment and surfaces, their suitability for the intended age groups shall be submitted to and approved in writing by the local planning authority.

The approved play spaces shall be provided in their entirety in accordance prior to occupation and shall be permanently retained thereafter.

Reason: To support the amenities of the proposed development and the wider area generally and ensure the development is suitable for children, in accordance with the requirements of A1 and H7 of the Camden Local Plan 2017.

#### 25 Diesel back-up generators

Prior to commencement of above ground works (other than demolition, site clearance and preparation), details of the proposed Emergency Diesel Generator Plant and any associated abatement technologies including make, model and emission details shall have been submitted to and approved by the Local Planning Authority in writing. Generators should be appropriately sized for life saving functions only, alternatives to diesel fully considered and testing minimised. Testing should only take place for a maximum of 10 hours per year. The maintenance and cleaning of the systems shall be undertaken regularly in accordance with manufacturer specifications and details of emission certificates by an accredited

MCERTS organisation shall be provided following installation and thereafter every three years to verify compliance with regulations made by the Secretary of State.

Reason: To safeguard the amenity of occupants, adjoining premises and the area generally in accordance with the requirements of policies A1 and CC4 of the London Borough of Camden Local Plan 2017.

# 26 Air Source Heat Pumps

Prior to commencement of above ground works (other than demolition, site clearance and preparation), details, drawings and data sheets showing the location, Seasonal Performance Factor of at least 2.5 (or COP of 4 or more or SCOP of 3.4 or more) 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 meter to monitor the energy output from the approved renewable energy systems. A site-specific lifetime maintenance schedule for each system, including safe access arrangements, shall be provided. The active cooling should not be activated unless the internal temperature exceeds 22 degrees Celcius. The equipment shall be installed in full accordance with the details approved by the Local Planning Authority and permanently retained and maintained thereafter.

Reason: To ensure the development provides adequate on-site renewable energy facilities in accordance with the requirements of policy CC1 of the London Borough of Camden Local plan Policies.

# Prior to occupation or use

# 27 Privacy screens - self-contained housing

Prior to first occupation of the affordable housing, details of measures, such as privacy screens to upper floor terraces and balconies, to protect the privacy of occupants of the development shall be submitted to and approved in writing by the local planning authority.

All such measures shall be implemented prior to first occupation of the development and shall be permanently retained.

Reason: To ensure adequate levels of privacy for future occupiers in accordance with policy A1 of the Camden Local Plan 2017.

# 28 Lighting Strategy

Prior to occupation, a detailed lighting strategy for the relevant areas of the public realm and fittings to the exterior of buildings shall be submitted to and approved in writing by the local planning authority.

The lighting shall be installed in accordance with the approved plans prior to the occupation of the development and thereafter retained.

Reason: In the interest of ecology, visual amenity and promoting a safe and secure environment in accordance with policies A1, A2, A3 and C5 of the Camden local Plan.

# 29 Signage Strategy

Prior to occupation of the commercial units, a signage strategy for the proposed ground floor unit frontages shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of Camden Local Plan policies D1 and D2.

# 30 Refuse and recycling

Prior to first occupation of each use, the refuse and recycling storage areas relating to that use shall be completed and made available for all occupants of that block.

The development of each block shall not be implemented other than in accordance with such measures as approved. All such measures shall be in place prior to the first occupation of any residential units and shall be retained thereafter.

Reason: To safeguard the amenities of the future occupiers and adjoining neighbours in accordance with the requirements of Camden Local Plan policy CC5.

#### 31 SuDS - Evidence of installation

Prior to occupation, evidence that the SUDS system has been implemented in accordance with the approved details as part of the development shall be submitted to the Local Planning Authority and approved in writing. The systems shall thereafter be retained and maintained in accordance with the approved maintenance plan.

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

# 32 Whole Life-Cycle Carbon Assessment

Prior to the occupation of the development:

- a) the post-construction tab of the GLA's Whole Life-Cycle Carbon Assessment template should be completed in line with the GLA's Whole Life-Cycle Carbon Assessment Guidance. The post-construction assessment should be submitted to the GLA at: ZeroCarbonPlanning@london.gov.uk, along with any supporting evidence as per the guidance and
- b) confirmation of submission to the GLA shall be submitted to, and approved in writing by, the local planning authority

Reason: In the interests of sustainable development and to maximise on-site carbon dioxide savings in accordance with the requirements of policy CC1 and CC2 of the London Borough of Camden Local Plan 2017.

## 33 Post-construction monitoring report

Prior to the occupation of the development, a postconstruction monitoring report and spreadsheet should be completed in line with the GLA's Circular Economy Statement Guidance. The post-construction monitoring report shall be submitted to the GLA, currently via email at: circulareconomystatements@london.gov.uk, along with any supporting evidence as per the guidance. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the local planning authority, prior to occupation of any part of the development

Reason: In the interests of sustainable waste management and in order to maximise the re-use of materials in accordance with policy S12 of the London Plan 2021.

# 34 Secured by Design

Prior to occupation, evidence that the plans can achieve secured by design accreditation must be submitted to and approved in writing (in consultation with the Designing Out Crime Officer) by the local planning authority.

Reason: To ensure the development incorporates design principles which contribute to community safety and security in accordance with policy C5 of the Camden Local Plan 2017.

# 35 Full fibre connectivity

Prior to occupation of each block, detailed plans demonstrating the provision of sufficient ducting space for full fibre connectivity infrastructure within the development, shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure full connectivity in line with policy SI6 of the London Plan 2021.

# 36 Reuse and recycling of demolition waste

The demolition hereby approved shall divert at least 95% of demolition waste from landfill and comply with the Institute for Civil Engineer's Demolition Protocol and either reuse materials on-site or salvage appropriate materials to enable their reuse off-site. Prior to occupation, evidence demonstrating that this has been achieved shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure the development contributes to reducing waste and supporting the circular economy in accordance with the requirements of Policy CC1 of the London Borough of Camden Local Plan 2017, Camden Planning Guidance, and Policy SI 7 of the London Plan 2021.

# **Compliance conditions**

# 37 Non-road mobile machinery

No non-road mobile machinery (NRMM) shall be used on the site unless it is compliant with the NRMM Low Emission Zone requirements (or any superseding requirements) and until it has been registered for use on the site on the NRMM register (or any superseding register).

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 Camden Local Plan policies A1 and CC4.

#### 38 External fixtures

No lights, meter boxes, flues, vents or pipes, and no telecommunications equipment, alarm boxes, television aerials or satellite dishes shall be fixed or installed on the external face of the buildings, without the prior approval in writing of the Council.

Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of Camden Local Plan policies D1 and D2.

## 39 Plant noise

The external noise level emitted from plant, machinery or equipment at the development with specified noise mitigation hereby approved shall be lower than the typical existing 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 and thereafter be permanently retained.

Reason: To ensure that the amenity of occupiers of the site and surrounding premises is not adversely affected by noise from mechanical installations and equipment in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.

## 40 Anti-vibration

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

Reason: To ensure that the amenity of occupiers of the development site and surrounding premises is not adversely affected by vibration in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.

## 41 Landscaping - replacement planting

All hard and soft landscaping works shall be carried out in accordance with the approved landscape details by not later than the end of the planting season following completion of the development or any phase of the development. Any trees or areas of planting which, within a period of 5 years from the completion of the development, die, are removed or become seriously damaged or diseased, shall be replaced as soon as is reasonably possible and, in any case, by not later than the end of the following planting season, with others of similar size and species, unless the local planning authority gives written consent to any variation.

Reason: To ensure that the landscaping is carried out within a reasonable period and to maintain a high quality of visual amenity in the scheme in accordance with the requirements of policies A2, A3, D1 and D2 of the London Borough of Camden Local Plan 2017.

# 42 Fire Statement

The development shall be constructed in accordance with, and at all times occupied and managed in strict compliance with, the approved Fire Statement (doc ref: Fire Strategy and Gateway 1 Form prepared by Ashton Fire ref. AF3230 Rev 02, dated June 2024).

Reason: To ensure the development incorporates the necessary fire safety measures in accordance with policies D5 and D12 of the London Plan.

## 43 Urban Greening Factor (UGF)

The development shall achieve a UGF Score of at least 0.33 prior to occupation and shall be retained as such in perpetuity.

Reason: To ensure that the development achieves a high quality of landscaping which contributes to the visual amenity, character and biodiversity of the area in

accordance with the requirements of policies A2, A3 and D1 of the London Borough of Camden Local Plan 2017 and policy G5 of the London Plan 2021.

# 44 Emergency Generator flues

Unless otherwise agreed in writing by the local planning authority, all combustion flues must terminate at least 1m above the highest roof of the building and any other within a 20m radius, in order to ensure maximum dispersion of pollutants, and must be located away from ventilation intakes and accessible roof gardens and terraces.

Reason: In order to ensure the proposed development does not have a detrimental impact on occupiers of residential premises within the area and to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly nitrogen dioxide and particulates PM10 and PM2.5, in accordance with policy CC4 of the London Borough of Camden Local Plan 2017 and London Plan policy SI 1.

# 45 Housing

The development hereby approved shall provide 30 residential units (Class C3), comprising 17 social affordable rent and 13 intermediate rent units.

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

## 46 Wheelchair accessible student accommodation

The 29 wheelchair accessible student units shown labelled on the approved floorplans shall be constructed as Wheelchair-Accessible rooms/units to comply with the relevant parts of Part M of the Building Regulations.

Reason: To secure appropriate access for disabled people, older people, and others with mobility constraints, in accordance with policies H6 and C6 of the Camden Local Plan 2017.

# Building regulations (imposed optional requirements)

# 47 Wheelchair and accessible homes (building control optional requirements)

The following dwellings shown labelled on the approved floorplans shall be constructed as Wheelchair Accessible Dwellings to comply with Part M4(3)(2)(b) of the Building Regulations:

Flat 01\_01 (drawing ref. 356\_P20.161 Rev I); Flat 02\_04 (drawing ref. 356\_P20.162 Rev I); Flat 03\_04 (drawing ref. 356\_P20.162 Rev I)

All other dwellings hereby permitted shall be constructed to comply with Part M4(2) of the Building Regulations.

Reason: To secure appropriate access for disabled people, older people, and others with mobility constraints, in accordance with policies H6 and C6 of the Camden Local Plan 2017.

## 48 Water use (building control optional requirements)

The development hereby approved shall achieve a maximum internal water use of 105litres/person/day, allowing 5 litres/person/day for external water use.

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

## 34. INFORMATIVES – PLANNING PERMISSION

# 1 Waste comments (Thames Water)

Thames Water requests that the Applicant should incorporate within their proposal, protection to the property by installing for example, a non-return valve or other suitable device to avoid the risk of backflow at a later date, on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing wwqriskmanagement@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk/wastewaterguality.

As you are redeveloping a site, there may be public sewers crossing or close to your development. If you discover a sewer, it's important that you minimize the risk of damage. We'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-nearor-diverting-our-pipes.

The proposed development is located within 15m of our underground waste water assets and as such we would like the following informative attached to any approval granted. The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.https://developers.thameswater.co.uk/Developing-a-large-site/Planningyour-

structures.https://developers.thameswater.co.uk/Developing-a-large-site/Planningyour-development/Working-near-or-diverting-our-pipes.

Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

With regard to surface water drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required.

Should you require further information please refer to our website. https://developers.thameswater.co.uk/Developing-a-large-site/Apply-and-pay-for-services/Wastewaterservices

	Thames Water would advise that with regard to waste water network and waste water process infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.
2	Water Comments (Thames Water) Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.
3	London Underground
	The applicant is advised to contact London Underground Infrastructure Protection in advance of assessment of impact to London Underground assets, submission of method statement of the demolition and preparation of final design and associated method statements, in particular with regard to: demolition; excavation and construction methods.
4	Non-road mobile machinery
	Non-road mobile machinery (NRMM) is any mobile machine or vehicle that is not solely intended for carrying passengers or goods on the road. The Emissions requirements are only applicable to NRMM that is powered by diesel, including diesel hybrids. For information on the NRMM Low Emission Zone requirements and to register NRMM, please visit "http://nrmm.london/".
5	Cadent Gas
	Cadent Gas Ltd own and operate the gas infrastructure within the area of your development. There may be a legal interest (easements and other rights) in the land that restrict activity in proximity to Cadent assets in private land. The applicant must ensure that the proposed works do not infringe on legal rights of access and or restrictive covenants that exist.
	If buildings or structures are proposed directly above the apparatus the development may only take place following diversion of the apparatus. The applicant should apply online to have apparatus diverted in advance of any works, by visiting cadentgas.com/diversions.
	Prior to carrying out works, including the construction of access points, please register on <a href="www.linesearchbeforeudig.co.uk">www.linesearchbeforeudig.co.uk</a> to submit details of the planned works for review, ensuring requirements are adhered to.
6	Archaeology
	The written scheme of investigation will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.
7	High Speed Two

The applicant is advised that the application site lies adjacent to land that may be required to construct and/or operate Phase One of a high-speed rail line between London and the West Midlands, known as High Speed Two. Powers to construct and operate High Speed Two were secured on 23 February 2017 when Royal Assent was granted for Phase One of HS2. More information can be found at:

https://www.gov.uk/government/collections/high-speed-rail-london-west-midlands-bill.

## 35. CONDITIONS – LISTED BUILDING CONSENT

# 1 Three years from the date of this permission

This development must be begun not later than three years from the date of this permission.

Reason: In order to comply with the provisions of Section 92 of the Town and Country Planning Act 1990 (as amended).

# 2 Approved drawings

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

106885-PEF-ZZ-ZZ-SK-S-00801; 106885-PEF-ZZ-ZZ-SK-S-00802; 106885-PEF-ZZ-ZZ-SK-S-00803; 106885-PEF-ZZ-ZZ-SK-S-00804; 106885-PEF-ZZ-ZZ-SK-S-00805; 106885-PEF-ZZ-ZZ-SK-S-00806; 106885-PEF-ZZ-ZZ-SK-S-00807; 106885-PEF-ZZ-ZZ-SK-S-00808 106885-PEF-ZZ-ZZ-SK-S-00809; 106885-PEF-ZZ-ZZ-SK-S-00810; Heritage Engineering Report, prepared by Pell Frishman (dated January 2024)

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

## 3 Method statement - steel beams

No demolition shall commence until a demolition method statement for the removal of the steel beams attached to the Roundhouse has been submitted to and approved in writing by the local planning authority.

The demolition method statement shall include all the following:

- -Detail of the works and the methodology for detaching the steel beams from the Roundhouse.
- -Measures to prevent and minimise the potential for damage to the Roundhouse,
- -Details of supervision by a suitably qualified engineer, and
- -A programme for the works.

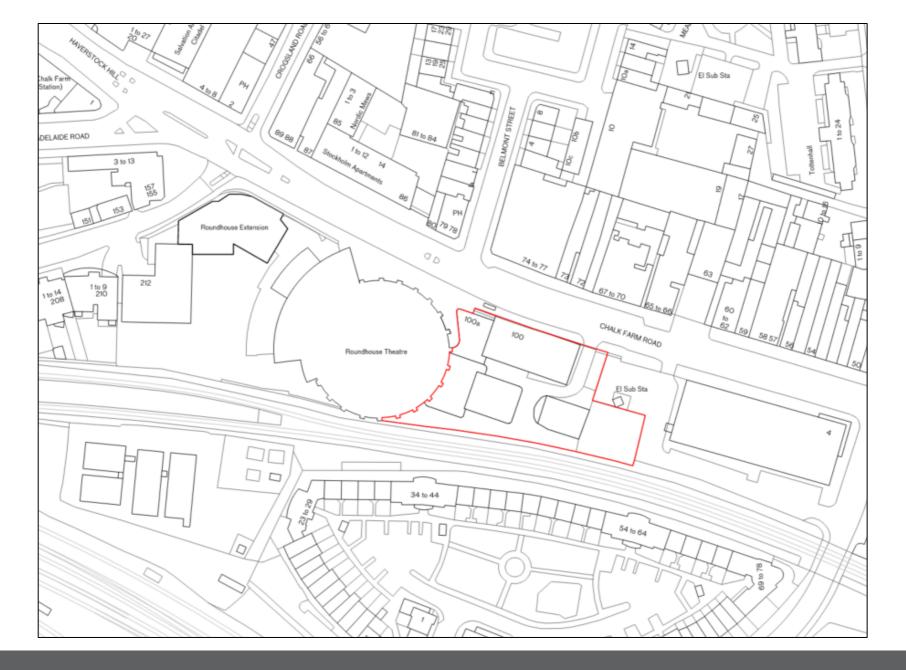
All works carried out as part of the development must be undertaken in accordance with the terms of the agreed demolition method statement.

Reason: To protect the stability, fabric and significance of the Roundhouse, in accordance with policy D2 of the Camden Local Plan 2017.

## 4 Cleaning of brickwork

No cleaning of exposed brickwork shall commence until a detailed methodology for the cleaning process has been submitted to and approved in writing by the local planning authority. Any cleaning of brick must be carried out in strict accordance with the approved methodology.

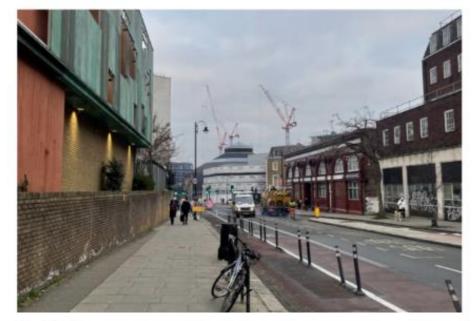
Reason: To protect the fabric and significance of the Roundhouse, in accordance with policy D2 of the Camden Local Plan 2017.







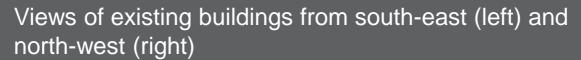
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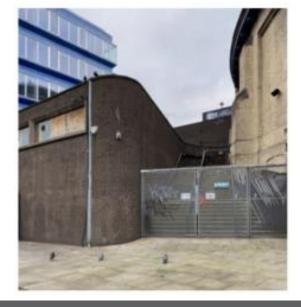
View of 100-100A Chalk Farm Road from south-east



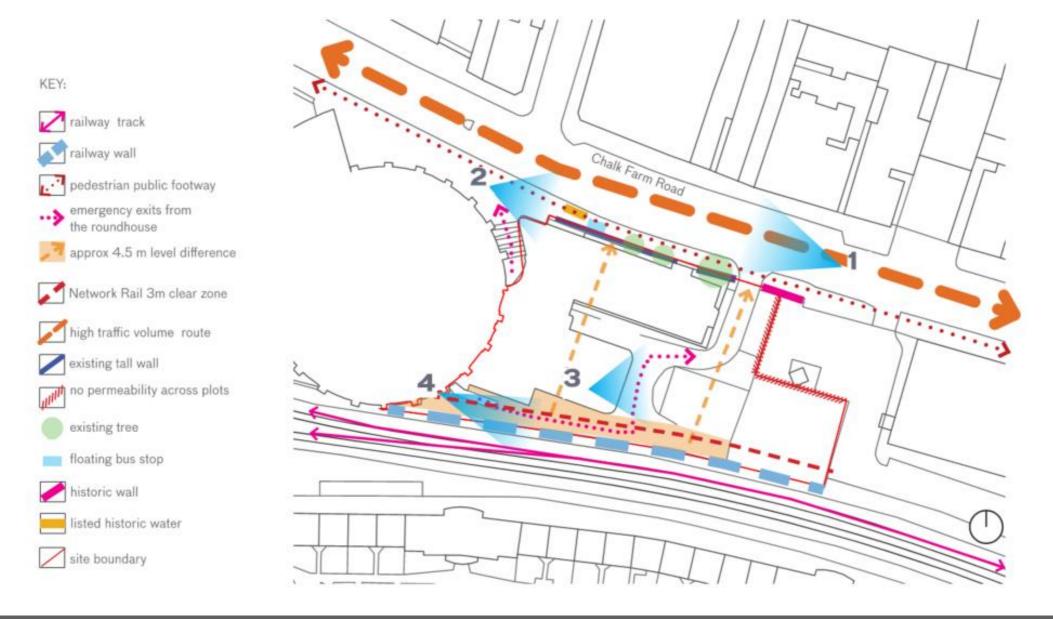
View of 100-100A Chalk Farm Road from north-west



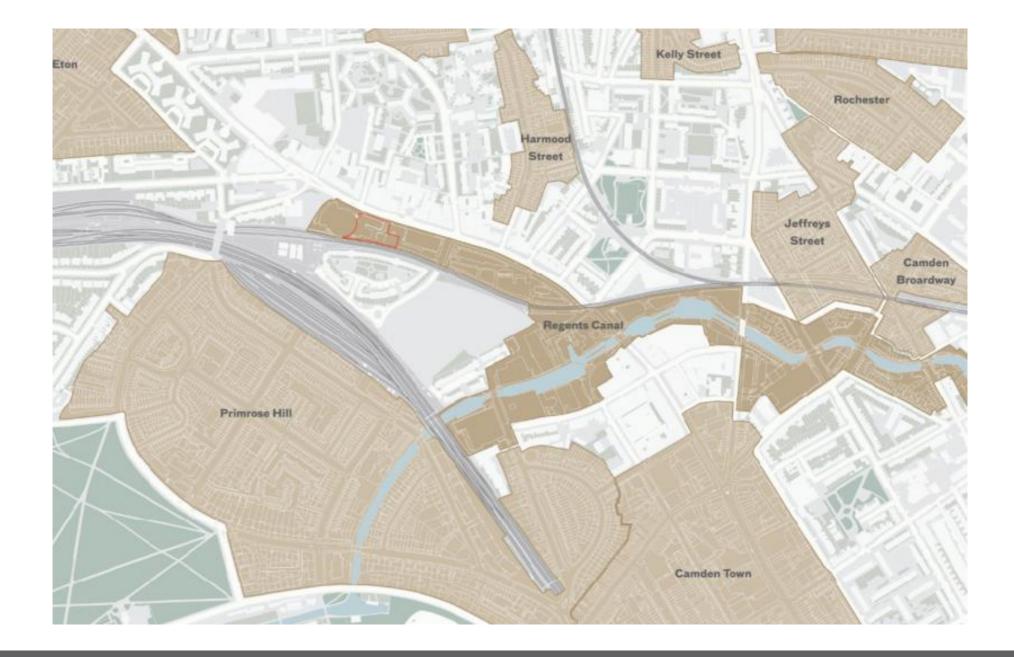




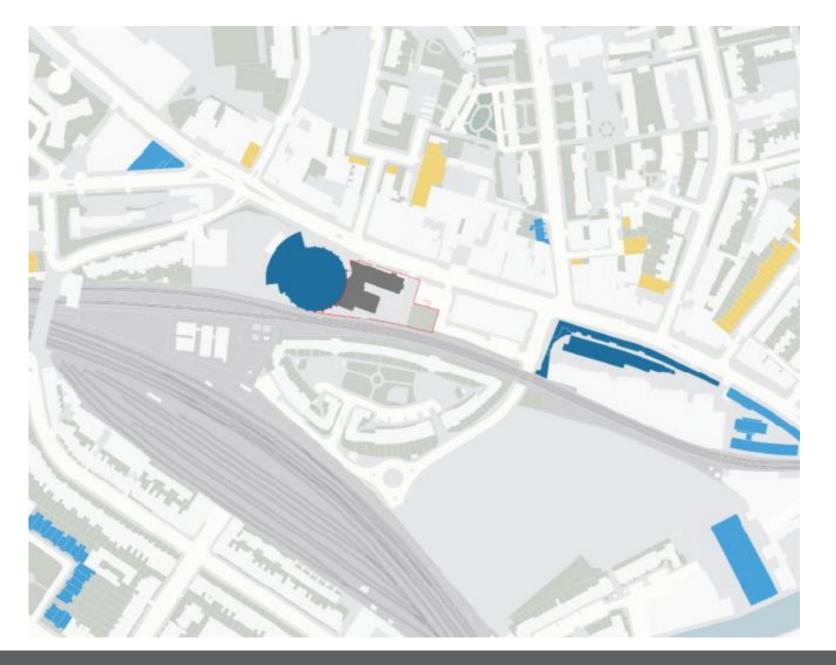












Grade II

Grade II\*

Locally Listed



