

<b>Address:</b>	Car Park adjacent to Harrington Square London NW1 2JL		<b>3</b>
<b>Application Number(s):</b>	2023/3824/P	<b>Officer:</b> Josh Lawlor	
<b>Ward:</b>	Regents Park		
<b>Date Received:</b>	13/09/2023		
<b>Proposal:</b>	Development of the existing vacant car park involving the erection of a five-storey plus basement block of flats to provide 11 residential dwellings and associated works.		
<b>Background Papers, Supporting Documents and Drawing Numbers:</b>			
Architectural drawings			
0010 0010--SP0210-XX-XX-DR-A-0210P1, 0010--SP0220-XX-00-DR-A-0220P1, 0010-SP-XX-XX-DR-A-0550P1, 0010-SP-XX-XX-DR-A-0550P1, 0010-SP-XX-00-DR-A-0310, 0010-SP-XX-00-DR-A-7100, 0010-SP-XX-B-DR-A-0300P1, 0010-SP-XX-00-DR-A-0301P3, 0010-SP-XX-01-DR-A-0302P1, 0010-SP-XX-02-DR-A-0303P1, 0010-SP-XX-03-DR-A-0304P1, 0010-SP-XX-04-DR-A-0305P1, 0010-SP-XX-RF-DR-A-0306P2, 0010-SP-XX-XX-DR-A-0200P1, 0010-SP-XX-XX-DR-A-0500P3, 0010-SP XX-XX-DR-A-0502P1, 0010-SP-XX-XX-DR-A-0503P2, 0010-SP-XX-XX-DR-A-0501P3, 0010-SP-XX-XX-DR-A-2101P1, 0010-SP-XX-XX-DR-A-2102P1, 0010-SP-XX-XX-DR-A-2103P1, 0010-SP-XX-XX-DR-A-0201P1, 0010-2P-XX-XX-DR-A-2104P1			
Structural drawings			
HSC-REN-XX-00-DR-S-01100 P04, HSC-REN-XX-01-DR-S-01101 P04, HSC-REN-XX-02-DR-S-01102 P04, HSC-REN-XX-03-DR-S-01103 P04, HSC-REN-XX-04-DR-S-01104 P03, HSC-REN-XX-05-DR-S-01105 P03, HSC-REN-XX-06-DR-S-01106 P03, HSC-REN-XX-B1-DR-S-01080 P04, HSC-REN-XX-B1-DR-S-01090 P04			
Energy/Sustainability Drawings			
P1739-NOV-XX-B1-DR-ME-8001I3, P1739-NOV-XX-00-DR-ME-8001I3, P1739-NOV-XX-RF-DR-M-6001P02, Appendix B SAPS Reports Various, Part L 2021 GLA Carbon Emission Spreadsheet v2.0			
Landscape drawings			
L-1001 P01, LN00700P01, LN00700P01, L-1004 P01, L-4001 P01, L-4001, L-1001 P01			

## Reports

Air Quality Assessment P04 prepared by XC02, Basement Impact Assessment (BIA) 2874-A2S-XX-XX-RP-Y-0003-04, Energy and Sustainability Statement P1739-ES-001 Rev G prepared by Novo, Bituminous standard detail (Blue Roof) D0000-00W\_BR\_011-Ext-SL-S-D4\_001, Outline drainage strategy P05, Below ground drainage general arrangement HSC-REN-ZZ-FN-DR-C-01100-P04, Proposed drainage area plan HSC-REN-XX-00-DR-C-00060-P03, Hurdwick House, Camden Arboricultural Development Report TF1228-FAB-00-XX-RP-G-8301 prepared by Fabrik, Daylight & sunlight prepared by GIA, Tree Removal and Arboricultural Impact Assessment Plan - Sheet 1 of 1 TF1228 FAB 00 XX DR G 8301 P01, Hurdwick House Arboricultural Survey TF1228-FAB-00-XX-RP-G-8201, Landscape Report November 2023, Biodiversity Survey and Report prepared by Ecology Partnership;

Financial Viability Assessment prepared by BNP Paribas, Servicing and Waste Management Plan, Residential Travel Plan and Transport Statement (including waste storage and collection), prepared by Caneparo Associates, Landscape management plan prepared by Outerspace, Planning Statement, Heritage Impact Assessment, Statement of Community Engagement (SCE) prepared by WSP, Phase I Geo-Environmental Assessment Report, Design and Access Statement prepared by Studio Power, Health Impact Assessment, (Draft) Construction Management Plan, prepared by Caneparo Associates, Noise Assessment prepared by KP Acoustics, Fire Strategy, prepared by Marshall Fire, Flood Risk Assessment and Sustainable Drainage Systems (SuDS) Strategy, prepared by Renaissance; Contamination Report prepared by Renaissance,

### **RECOMMENDATION SUMMARY:**

**Grant conditional planning permission subject to a Section 106 Legal Agreement**

<b>Applicant:</b>	<b>Agent:</b>
Salboy Ltd Birchwood One Business Park, Unit 3, Birchwood WA3 7GB	Philip Villars 27 Ferry Road The Boathouse Teddington TW11 9NN

## ANALYSIS INFORMATION

Land use details				
Use Class	Description	Existing GIA (sqm)	Proposed GIA (sqm)	Difference GIA (sqm)
C3	Dwellings (flats)	0	1381	+ 1381

Proposed residential use details						
	Residential Type	No. of Bedrooms per Unit				
		1	2	3	4	Total
Market	Flat	2	3	5		10
Affordable	Intermediate (flats)					
	London affordable Rente (flats)			1		1
Total Proposed	Flats & Houses	2	3	6		11

Parking details [Summary – Delete as appropriate]				
Type	Existing spaces	Proposed spaces	Difference	
Car	12	0	-12	
Cycle	0	24	+24	

## EXECUTIVE SUMMARY

- i) The scheme provides 11 new homes on a brownfield site in a highly sustainable location including a ground floor accessible 3 bedroom home delivered at London Affordable Rent. No harm has been identified to heritage assets, and there are public benefits beyond the most significant benefit of delivering homes to meet the Council's housing target. The delivery of housing holds significant weight in decision making, particularly as the Council has failed to meet the Housing Delivery Test (HDT), an annual measurement of housing delivery against Local Plan and London Plan housing targets. There would also be a £300,000 PIL towards the Council's affordable housing fund.
- ii) The proposed homes comfortably exceeds minimum space standards and would provide a high-quality living environment for future occupiers with the provision of external amenity space.

- iii) The scale and design of the proposed building are contextual, responding to the surrounding buildings' heights and historical context in a contemporary way. The DRP has reviewed and endorsed the design.
- iv) The scheme is highly sustainable and complies with adopted energy and sustainability targets within the development plan. There is an open space contribution towards the improvement of green spaces in the local area. The scheme provides urban greening and on-site energy generation.
- v) There is the provision of Community Infrastructure Levy contributions and other financial contributions related to transport. As such the scheme is considered to comply with the development plan as a whole.

## OFFICER REPORT

### Reason for Referral to Committee:

Major development involving the provision of more than 10 new dwellings [Clause 3(i)] and involves the making a S106 planning obligation for which the Director of Regeneration, Economy and Investment does not have delegated authority [Clause 3 (iv)].

### 1. SITE AND BACKGROUND

#### *Location*

- 1.1 The site is a vacant car park formerly serving the adjacent residential flats 1-20 Hurdwick House east of Harrington Square/Hurdwick Place. The site covers an area of approximately 500 sqm.
- 1.2 The site comprises predominantly hard surfacing with some soft landscaping fronting the site. Access to the application site is off Harrington Square, which provides access to the existing Hurdwick House residential development.

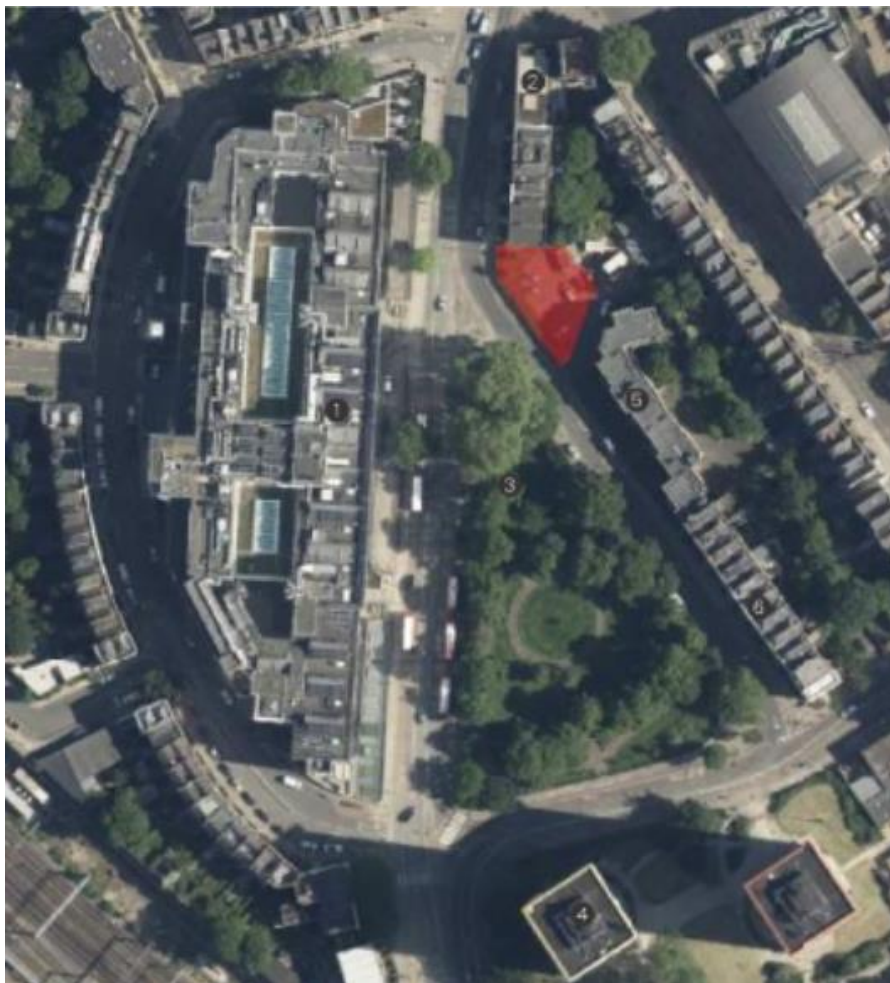


Figure 1 – The existing site

- 1.3 There are 16 car parking spaces adjacent to Hurdwick House – seven are let, and nine are void. Six of the seven are let to Hurdwick House tenants or resident leaseholders and spaces will be available for them on the estate after the disposal of the site. A seventh space is let to a Camden Council tenant on a neighbouring estate and there are void spaces available nearby for them
- 1.4 To its south is Hurdwick House a four-storey post-war housing development. To the north are 1-5 Hurdwick Place, a four-storey plus basement Grade II Listed terrace. To the south are residential dwellings on the upper floors and commercial/retail units on the ground floor which face onto Eversholt Street. The site is in the Camden Town Conservation Area but is not referenced in the Camden Town Conservation Area Appraisal and Management Strategy (CAAMS).
- 1.5 The site has a PTAL rating of 6a, which means it has excellent access to public transport. The site is a one-minute walk to Mornington Crescent Underground Station and close to Central London and rail stations to the south, including Euston Station, where work is underway on the construction of High Speed 2 (HS2).

## **2. THE PROPOSAL**

- 2.1 The proposal is for a new five-storey (plus basement) residential building (Class C) to provide 11 new residential flats: 2 x 1 bed, 3 x 2 beds, 6 x 3 beds. The proposed building will be attached to No. 5 Hurdwick Place. The proposal will incorporate two new entrances directly off Harrington Square. There are two private entrances for the proposed residential units on the ground floor. The third entrance will provide access for the residents across the remainder of the floors. A rear access is provided, which will be for the refuse and recycling area, the cycle parking room, and the external amenity space for the ground floor units.
- 2.2 The proposed building will be located on existing car parking. This parking was originally provided for residents at Hurdwick House until the council sold the site to the applicant. The proposal will reduce 12 unused car parking spaces. Those in Hurdwick with parking spaces will still have them elsewhere, the rest of the spaces were unused bar one rented to a Camden Council tenant on a neighbouring estate who will get access to a space elsewhere
- 2.3 Landscaping will be provided at ground floor level fronting Harrington Square, some of which will be private amenity space for the ground-floor units. New landscaping is proposed at the rear. Landscaping is also proposed on the first-floor terrace. A green roof is proposed at the top floor of the building alongside PV panels.

2.4 All homes will have access to communal and private outside space and will be in accordance with national minimum space standards. All homes will be accessible or adaptable for disabled people in line with the requirements of part M4 of the Building Regulations.

## 2.5 Revisions

2.6 There were no significant revisions to the proposal during the application; however, there were during pre-app, the design changes/amendments are summarised in Section 10 Design.

## 3. RELEVANT HISTORY

### *The site*

3.1 There are no relevant planning applications/permissions for this site.

## 4. CONSULTATION

### *Statutory consultees*

#### **TfL Underground Zone of interest**

No objection in principle, but there are a number of potential constraints on the redevelopment of a site situated close to London Underground railway infrastructure and we have requested a condition for further details to be submitted (added as condition 24).

#### **Lead Local Flood Authority**

No objection with detailed feedback incorporated in the Flooding section.

### *Local groups*

#### **Camden Town CAAC**

4.1 No response received.

#### ***Adjoining occupiers***

4.2 Three site notices were displayed: one on Harrington Square to the front of the site, one on Hurdwick Place and one on Eversholt Street. The notices were displayed on 20/09/2023, expiring 14/10/2023, and the application was advertised in the local paper on 21/09/2023 (expiring 15/10/2023).

4.3 One objection was received from 1 local household at Hurdwick House. The objection received is on the Council's website. Support was also received from 1 local household. The key issues raised are summarised as follows:

### Loss of amenities

- The development would overshadow our flat. It would block sunlight that enters my apartment, which is essential not only for the aesthetics of my living environment but also for my physical and mental well-being.
- Loss of views/outlook from my windows

### Noise and disturbance

- Noise, disturbance and dust from construction activities.

### Transport

- Concern about increased vehicular traffic, increased parking demand from new flats and removal of car park placing strain on limited on-street spaces.

### Other issues

- Negatively impacting our property values.

*Officer response: Please see Section 8 for an assessment of Impact on residential amenities and Section 14 Transport (specifically section on Construction Management Plans) for an assessment of these issues. It is noted that the proposal is considered to be in overall compliance with BRE guidance on loss of light and overshadowing. It is noted that the loss of property values is not a material planning consideration.*

## 5. POLICY

### ***National and regional policy and guidance***

[National Planning Policy Framework 2023 \(NPPF\)](#)

[Draft NPPF 2024](#)

[National Planning Practice Guidance \(NPPG\)](#)

[Written Ministerial Statement on First Homes \(May 2021\)](#)

[London Plan 2021 \(LP\)](#)

[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 H2 Maximising the supply of self-contained housing from mixed-use schemes](#)

[Policy H4 Maximising the supply of affordable housing](#)

[Policy H5 Protecting and improving affordable housing](#)

[Policy H6 Housing choice and mix](#)

[Policy H7 Large and small homes](#)



[Policy C1 Health and wellbeing](#)  
[Policy C5 Safety and security](#)  
[Policy C6 Access for all](#)  
[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 CC1 Climate change mitigation](#)  
[Policy CC2 Adapting to climate change](#)  
[Policy CC3 Water and flooding](#)  
[Policy CC4 Air quality](#)  
[Policy CC5 Waste](#)  
[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

*Most relevant Camden Planning Guidance (CPGs):*

[Access for All CPG - March 2019](#)  
[Air Quality - January 2021](#)  
[Amenity - January 2021](#)  
[Basements - January 2021](#)  
[Biodiversity CPG - March 2018](#)  
[Design - January 2021](#)  
[Developer Contribution CPG - March 2019](#)  
[Energy efficiency and adaptation - January 2021](#)  
[Housing - January 2021](#)  
[Planning for health and wellbeing - January 2021](#)  
[Public open space - January 2021](#)  
[Transport - January 2021](#)  
[Trees CPG - March 2019](#)  
[Water and flooding CPG - March 2019](#)

*Other guidance:*

[Planning Statement - Intermediate Housing Strategy and First Homes \(2022\)](#)

The Camden Town Conservation Area Appraisal and Management Strategy (October 2007).

#### Draft Camden Local Plan

The council has published a new [Draft Camden Local Plan](#) (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).

## **ASSESSMENT**

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

<b>6</b>	<b>LAND USE</b>
<b>7</b>	<b>QUALITY OF PROPOSED HOUSING</b>
<b>8</b>	<b>AFFORDABLE HOUSING AND VIABILITY</b>
<b>9</b>	<b>IMPACT ON NEIGHBOURHOOD AMENITY</b>
<b>10</b>	<b>HERITAGE</b>
<b>11</b>	<b>DESIGN</b>
<b>12</b>	<b>SUSTAINABILITY AND ENERGY</b>
<b>13</b>	<b>AIR QUALITY</b>
<b>14</b>	<b>BASEMENT</b>
<b>15</b>	<b>OPEN SPACE</b>
<b>16</b>	<b>TRANSPORT</b>
<b>17</b>	<b>BIODIVERSITY NET GAIN</b>
<b>18</b>	<b>FIRE</b>
<b>19</b>	<b>ECONOMIC BENEFITS, LOCAL EMPLOYMENT AND PROCUREMENT</b>
<b>20</b>	<b>COMMUNITY INFRASTRUCTURE LEVY(CIL)</b>
<b>21</b>	<b>CONCLUSION</b>
<b>22</b>	<b>RECOMMENDATION</b>
<b>23</b>	<b>LEGAL COMMENTS</b>
<b>24</b>	<b>CONDITIONS</b>
<b>25</b>	<b>INFORMATIVES</b>

## **6. LAND USE**

### ***New housing***

- 6.1 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 proposals, the presumption in favour of sustainable development in paragraph 11(d) of the NPPF is engaged, and there is a need to place great weight on 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.

6.2 London Plan Policy H1 and Table 4.1, set a 10-year housing target for Camden of 10,380 additional homes from 2019/20 to 2028/29

6.3 The proposed 11 new dwellings within a sustainable location on brownfield land would contribute towards the strategic objectives of the CLP and contribute to the borough's housing, which must be given significant weight.

#### **Housing mix**

6.4 Policy H6 (Housing choice and mix) of the CLP seeks to secure a variety of housing suitable for existing and future households. Policy H7 (Large and small homes) seeks a range of homes of different sizes that will contribute to the creation of mixed, inclusive and sustainable communities, and reduce mismatches between housing needs and existing supply.

6.5 CLP Policy H7 requires proposals to comply with the Dwelling Size Priorities Table (Table 1) which sets out that for market housing, there is a high need for two- and three-bedroom homes within the Borough. One bedroom/studios and four bedroom homes have less priority. A breakdown of the bedrooms per dwelling have been set out below:

Size	Number of dwellings	Percentage
1 bed (2 persons)	2	18%
2 bed (3 persons)	2	18%
2 bed (4 persons)	1	9%
3 bed (5 persons)	4	37%
3 bed (6 persons)	2	18%
Total:	11	100%

*Table 1 – Proposed housing mix*

6.6 The proposed development would consist of 2 x 1 bed dwellings, 3 x 2 bed dwellings and 6 x 3 bed dwellings. The housing mix proposed has been configured to meet the identified needs of the CLP and address the high demand for two- and three-bedroom dwellings. The proposed housing mix will provide for both individuals and families meeting the needs of various household types in line with the Council’s objectives.

**7. QUALITY OF PROPOSED HOUSING**

7.1 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.

7.2 In line with LP policy D6 and CLP policies H6 and D1, housing 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 several factors, including privacy, outlook, light, and noise. CLP policy A4 says suitable noise and vibration measures should be incorporated in new noise-sensitive development.

7.3 LP policy D5 says development should provide the highest standard of accessible and inclusive design, which allows them to be used safely, easily, and with dignity by all, also reflected in CLP policies D1, H6, and C6.

***Design and layout***

7.4 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 units, ensuring high quality homes across the scheme. CLP policy H6 confirms that new residential development should conform to the Nationally Described Space Standards, and this is reflected in LP policy D6 which sets the same minimum space standards in Table 3.1 of the London Plan 2021. The relevant excerpt from the table is reproduced below.

Unit no.	No. of person	London Plan space standards (sqm)	Proposed Area (sqm)
1	3b5p	86	97
2	2b4p	70	96
3	3b5p	86	88
4	2b3p	61	66

5	1b2p	50	50
6	3b5p	86	88
7	2b3p	61	66
8	1b2p	50	50
9	3b5p	86	99
10	3b6p	95	113
11	3b6p	95	135

*Table 2 - Minimum internal space standards (London Plan Table 3.1, Policy D6) and the proposal floorspace*

- 7.5 All the residential units in the detailed scheme meet or exceed the minimum standards. The new units would have good ceiling floor to heights (over 2.5 metres) and good room sizes. They are well laid out with a simple and rational plan form. All flats have access to either a balcony, terrace or ground floor garden and there is a communal terrace area at first floor level. Each of these external amenity spaces matches or exceeds the minimum London Plan space standard of 5 sqm per 1-2 person dwelling and an extra 1 sqm for each additional occupant.
- 7.6 The units all have their own secure front door. The two ground floor units have a front door that leads to the street. A residential core provides a staircase and lift. The cores provide access to secure lobbies leading to street and communal amenity space.
- 7.7 Overall, the proposed flats, would have a high quality of internal amenity in terms of floorspace, functional layout and access to light and outlook.

***Noise and vibration***

- 7.8 A condition is imposed to ensure adequate sound insulation is provided between separate units to ensure future occupiers are protected from internal noise transfer. A condition is imposed to require details of sound insulation measures and ventilation for all habitable rooms exposed to external road traffic noise. The plant equipment is located at basement level and therefore would not lead to noise disturbance issues.

***Dual aspect units***

- 7.9 LP policy D6 says the number of dual aspect homes should be optimised. All the homes (100%) would be dual aspect which is welcomed. This improves the quality of accommodation and reduces the risk of dwellings overheating as it allows for cross ventilation.

### ***Daylight and sunlight***

- 7.10 The internal daylight/sunlight report applies the relevant BRE guidelines to the proposed units. The Building Research Establishment publishes the leading industry guidelines on daylight and sunlight in BR209 'Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice' (third edition, 2022) (BRE). The development plan supports using the BRE guidance for assessment purposes. However, it should not be applied rigidly but should be used to make a balanced judgement.
- 7.11 Paragraph 129 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 efficient site use as long as the resulting scheme would provide acceptable living standards.
- 7.12 BRE also suggests Spatial Daylight Autonomy (sDA) and sunlight exposure targets. They have been tested against the sDA targets set out within the UK National Annex (UKNA) on BS EN 17037:2018 for daylight rooms.
- 7.13 The National Annex provides suggested targets for dwellings in the UK. The UK Annex recommends illuminance levels of 100 Lux in bedrooms, 150 Lux in living rooms, and 200 Lux in kitchens. These are median illuminances to be achieved over 50% of the assessment area for at least half of the daylight hours. However, it also says that a living room target of 150 Lux could be used for a combined living/kitchen/dining room.
- 7.14 The results show that 32 (87%) of the 37 habitable residential rooms will meet or exceed the minimum levels of sDA recommended by BRE and are therefore considered to offer very good daylight amenity. Most of these rooms see sDA levels well above recommendation.
- 7.15 The five rooms falling short of recommendations are two bedrooms and three combined living/kitchen/dinning (L/K/D) rooms located behind the most constrained areas of the façade. The two bedrooms that fall short of the guidance are part of 3 bedroom units where other rooms exceed minimum sDa levels. Of the three LKDs falling short of the guidance, two of them do so only marginally. The remaining LKD is located on the north-eastern oriented unit on the first floor, which currently has lower daylight potential and is located behind a generous inset balcony which reduces natural light.
- 7.16 The sunlight results are similar with 10 out of 11 units exceeding the minimum 1.5 hours of sunlight on the 21st of March. The one unit seeing lower levels of sunlight is the north-eastern oriented unit located on the first floor which naturally has lower sunlight expectations and is also obstructed by the neighbouring residential block Hurdwick House and inset balcony located at the front.



*Figure 2: 1 bed unit on first floor is only flat which does not meet target illuminance hours of 200 for L/K/D and 100 for a bedroom*

7.17 As set out within the BRE guidelines and the NPPF, daylight and sunlight availability are one of several considerations in site layout design. A balance between the various design factors needs to be made to ensure an overall high quality of housing. Other issues such as provision of a balcony, for amenity space (see section below) and for shading to reduce solar gain, need to be considered together. Overall, whilst achieving this balance, the daylight and sunlight assessment results are considered to show a good level of compliance while ensuring the development makes optimal use of the potential for the site.

### ***Outlook and privacy***

7.18 The flats would have a high-quality outlook with acceptable separation distances and variation of views. The proposed building retains 10m from the rear of the existing residential buildings on Eversholt Street however, the building layout means that there are no direct views from the proposed habitable rooms into existing habitable rooms. The potential for overlooking 1-5 Hurdwick Place to the north is mitigated by locating the windows on the western, southern, and eastern facades. The side elevation (east) faces the stair core of Hurdwick House, and therefore, there will be no overlooking into each property.

7.19 The outlook on the eastern façade is constrained by neighbouring properties at Hurdwick House and along Eversholt Street. The windows face Hurdwick House so the outlook is away from habitable rooms. Furthermore, the balconies proposed have been indented within the building, so they are set back further

away from the neighbouring properties. The building is set at an angle to reduce direct surveillance of Hurdwick House.

- 7.20 These aspects of the design provide a reasonable sense of outlook and privacy, even in a denser environment.

#### ***External amenity space***

- 7.21 CLP policy A2 states developments should seek opportunities for providing private amenity space, and LP policy D6 says that 5sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1sqm should be provided for each additional occupant. It must achieve a minimum depth and width of 1.5m.
- 7.22 Each proposed dwelling has its own private amenity space through a garden or a balcony. The terraces and gardens range from 5sqm to 8sqm, depending on the unit size, and ensure a depth and width of 1.5m or more, with all units meeting the LP policy requirements. The proposal also seeks to provide a communal terrace area to the rear of the building at ground floor and at the first-floor level for use by the residents of the proposed building.
- 7.23 Overall, the provision of amenity space, both private and communal, complies with policy and would result in high-quality development and provision for future occupiers.

#### ***Accessible units***

- 7.24 CLP policy H6 requires 90% of new-build homes to comply with M4(2) (accessible and adaptable dwellings) and a requirement for 10% of new build homes to comply with M4(3) (wheelchair user dwellings). The flats have been designed to meet these requirements and offer a high standard of accessible and inclusive design. Para 3.153 of the CLP indicates that the percentage requirements will be rounded to the nearest whole number of dwellings. One flat (9%) will comply with M4(3) (Flat 01 on the ground floor), while the remaining 10 (91%) will comply with M4(2).
- 7.25 There is level access from the street to the main entrance on the ground floor, and level access within the proposed building. The communal garden area at the rear has level access from the primary entrance, the communal terrace at first floor has level access from a lift from ground floor; in addition, the M4(3) home (Flat 01) has a private entrance and a small private terrace.
- 7.26 The M4(3) requirements refer collectively to "wheelchair user dwellings" which include both wheelchair adaptable dwellings under M4(3)(2)(a) (ones which can be easily adapted for a wheelchair user), and wheelchair accessible dwellings under M4(3)(2)(b) (ones which are fully adapted for a wheelchair user when constructed). Wheelchair accessible dwellings are only required where M4(3) applies to social-affordable rented homes and the Council is able to nominate the incoming tenants. In this case, the flat designed to comply with M4(3) is a



social-affordable rented home (Flat 01 on the ground floor), so a condition will be used to secure full accessibility in compliance with M4(3)(2)(b).

- 7.27 The amount of accessible housing delivered by the scheme will have a notable positive impact on disabled residents (disability being a protected characteristic – see note at the front of the committee pack on the Public Sector Equality Duty).

### ***Conclusion***

- 7.28 The proposed homes are considered acceptable in terms of aspect, outlook, noise, light, and amenity space and would provide an acceptable level of amenity. They would provide accessible homes for all, including provision of one wheelchair accessible unit, allowing the buildings to house an inclusive community that can use them safely, easily and with dignity.

## **8. AFFORDABLE HOUSING AND VIABILITY**

### ***Affordable housing requirements***

- 8.1 Camden Local Plan policy H4 and the Housing CPG seek provision of affordable housing. Where the uplift in residential floorspace has the capacity for 10 or more new homes (assuming 100 sqm per home on average), the council expects affordable housing to be provided on-site, subject to viability. Where the capacity is for fewer than 10 homes (less than 950 sqm when rounded), the policy accepts payment instead of offering affordable on-site housing. Policy H4 also provides a guideline mix for affordable housing types (60% social-affordable rent and 40% intermediate housing), while supporting paragraph 3.105 indicates that the guideline will operate flexibly, and Housing CPG indicates that the mix will be assessed on the basis of floorspace.
- 8.2 Officers have used the assessment of capacity and the sliding scale to determine the affordable housing percentage target. The target floor space is 386.7 sqm. The target is based on housing capacity being 1,381/100 rounded to the nearest 100 = 14 homes.
- The percentage target is capacity (1400) x 2% = 28%
  - 28% x 1,381 = 387 sqm
- 8.3 The applicant is providing the M4(3) compliant ground-floor 3 bedroom, 5-person unit at London Affordable Rent and has been in discussions with Sapphire Housing, a registered provider from the Councils approved list, who would own and operate the affordable home. The s106 agreement will secure the flat as London Affordable Rented Housing in accordance with the requirements for these types of housing in government policy, GLA guidance, and Camden Planning Guidance
- 8.4 The 3-bedroom unit is 96 sqm out of 947 sqm (Net Internal Area), which equals 10.14%. In terms of the building's GIA, this unit makes up 10.14% x 1,381 sqm

= 140 sqm. Therefore, the remaining target capacity becomes approx. 387-140  
 = 247 sqm

8.5 As the affordable housing requirement can only be partly met on-site, officers have sought an affordable housing payment-in-lieu (PiL) to make good the shortfall. Applying the payment in lieu of £5,000 per sqm set out in Housing CPG, the total payment under the policy target would be **£1,235,000**

Additional residential floorspace (GIA sqm)	Capacity (rounded floorspace addition/100sqm)	Additional housing % target	Affordable housing floorspace target (after delivery of one on-site affordable home)	Payment in lieu required
1,381	1400	28%	387-140 = 247 sqm	247 X £5,000 = £1,235,000

*Table 3 – Calculation of full payment-in-lieu*

8.6 The shortfall in on-site provision and the policy-compliant payment have been subject to viability testing. The viability assessment shows the scheme is capable of realising a surplus, enabling a contribution of enabling delivery of an on-site affordable home and some further contribution through a top-up payment-in-lieu. However, following the introduction of the on-site affordable home, the applicant's viability advisor firmly believes that the full 'top-up' payment-in-lieu of £1,235,000 cannot be funded.

8.7 The viability advisors for the Council and the applicant have agreed a Benchmark Land Value (BLV) for the site of £726,000, based on the Existing Use Value (EUV) of the site (as car parking) with a small premium to incentivise the landowner to release it. EUV is the first component of calculating benchmark land value. EUV is the value of the land in its existing use. Existing use value is not the price paid and should disregard hope value as stated in Planning Practice Guidance.

8.8 The Benchmark land value should:

- be based upon the existing use value.
- allow for a premium to landowners (including equity resulting from those building their own homes).
- reflect the implications of abnormal costs; site-specific infrastructure costs; and professional site fees.

8.9 The price paid for the land is not generally considered as a factor in determining the Benchmark Land Value. Paragraph 041 of Planning Practice Guidance

states that “*where viability assessment is used to inform decision making under no circumstances will the price paid for land be a relevant justification for failing to accord with relevant policies in the plan*”.

- 8.10 Nevertheless, the applicant has pointed out that in this instance the property was purchased from the Council for over £2.5 million (confirmed by Camden's Property Services as £2,565,000). The Cabinet report seeking approval for disposal of the site indicated that "The land will generate a receipt to support CIP objectives elsewhere including investment in new social rent homes, Camden Living rent homes and investment in schools and community facilities". The difference between the Benchmark Land Value of £726,000 and the price paid for the land (in effect an "over-payment" by the purchaser) is more than £1.8 million.
- 8.11 The Council's viability advisors indicate in their final viability addendum that the surplus (after inclusion of an on-site affordable home but before any payment-in-lieu) would be approx. £1.3 million, which is significantly less than the purchaser's over-payment. Clearly, the Council must make decisions in accordance with the Government's guidance on viability assessment. However, the Council can of course reasonably take into account the benefits arising from the proposals, and prospects for the site if the development is unable to proceed.
- 8.12 Based on the difference between the RP offer for the on-site affordable home and the average value of the market homes, officers estimate that value of the affordable home to the Council is around £850,000.
- 8.13 If the development is unable to proceed due (for example) to a higher payment in lieu or imposition of a late-stage viability review based on the Benchmark Land Value; there is a risk that the site would remain undeveloped indefinitely while the developer awaited a major improvement in market values relative to build costs, or decided to sell at a loss.
- 8.14 The usual solution where we require a payment in lieu of affordable housing, and the applicant is unable to fund this fully, is to seek a late-stage (post-construction) viability review, providing potential for a deferred affordable housing contribution. This is not a workable solution for the applicant, as the price they have paid for the land is much greater than the Benchmark Land Value that would feed into the late-stage viability review. Given these circumstances, we have negotiated for an upfront payment in lieu of £300,000 instead of a late stage viability review.
- 8.15 The developer initially offered a much smaller upfront payment, subsequent to which £300,000 was the maximum that could be negotiated, which is 24.3% of the full payment in lieu we would seek in addition to the on-site affordable home. This share of the full payment is comparable with payments agreed upon in other circumstances where we have negotiated an up-front payment as an

alternative to late-stage viability review. Noting the applicant's over-payment for the site, any greater level of contribution is likely to reduce any residual incentivising % profit in the scheme to an increasingly marginal value (which in any event will be considerably less than the 17.5% of Gross Development Value assumed by both sets of viability advisors) to incentivise them to proceed with the scheme.

8.16 In summary, the development will deliver:

- an affordable home in the form of a 3-bed wheelchair M4(3) compliant ground floor flat for London affordable rented;
- £300K payment towards affordable housing upon implementation; and
- a much-needed addition to the borough's housing supply in the context of recent Housing Delivery Test results.

8.17 The national First Homes policy is in 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. The current government has also indicated that the 25% stipulation may be removed from national policy in due course. 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.

## **9. IMPACT ON NEIGHBOURING AMENITY**

9.1 CLP policies A1 and A4 and the Amenity CPG are 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. Impact 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 current and occupiers should be protected and development which causes an unacceptable level of harm to amenity should be refused.

### **9.2 Daylight and sunlight**

9.3 A Daylight, Sunlight and Overshadowing Report has been submitted as part of the application which details any impacts upon neighbouring properties.

- 9.4 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 should not be applied rigidly and should be used to quantify and understand impact when making a balanced judgement.
- 9.5 Paragraph 129 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, if the resulting scheme would provide acceptable living standards.

#### Methodology

- 9.6 The methodology and criteria used for the assessment is based on the approach set out by BRE guidance. The report makes use of several standards in its assessment of surrounding buildings which are described in the BRE guidance:
- **Vertical Sky Component (VSC)** – This relates to daylight on the surface of a window. A measure of the amount of sky visible at the centre of a window.
  - *The BRE considers that daylight may be adversely affected if, after development, the VSC is both less than 27% and less than 0.8 times (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 to 0.8 times its existing value (a reduction of more than 20%) before the daylight loss is noticeable.*
  - **Annual Probable Sunlight Hours (APSH)** - A measure of the amount of sunlight that windows of main living spaces within 90 degrees of due south receive and a measure of the number of hours that direct sunlight reaches unobstructed ground across the whole year and also as a measure over the winter period. The main focus is on living rooms.
  - The BRE considers 25% to be acceptable APSH, including at least 5% during the winter months. Impacts are noticeable if less than these targets, and sunlight hours are reduced by more than 4 percentage points, to less than 0.8 times their former value. It recommends testing living rooms and conservatories.
  - The **overshadowing** of open spaces is assessed by considering any changes to surrounding outdoor amenity spaces. A Sun Hours on Ground assessment has been undertaken which uses the BRE methodology.
  - The BRE recommends at least half (50%) of the area should receive at least two hours (120 mins) of sunlight on the 21st March, and the area which can receive some sun on the 21st March is less than 0.8 times its former value.

- 9.7 Existing windows with balconies above them typically receive less daylight. Because the balcony cuts out light from the top part of the sky, even a modest obstruction opposite may result in a large relative negative impact on the VSC, and on the area receiving direct skylight. Where there are balconies which can cause obstruction, the BRE guidelines suggest modelling the impacts with and without the balconies. This allows you to test whether the presence of the balcony or overhanging walkway, rather than the size of the new obstruction (the proposed development), is the main factor in the relative loss of light.

#### Assessment of neighbouring properties

9.8 5 Hurdwick Place

- 9.9 This property is a four-storey residential end terrace building converted into apartments. All seven rooms relevant for daylight analysis in accordance with the BRE Guide, meet BRE Guidelines for both VSC and NSL.

9.10 Sunlight (ASPH)

- 9.11 Three rooms would fail winter sunlight with 3% and the remaining two will retain 4% against a target of 5%. These rooms retain excess of the BRE target of 25% for annual sunlight. All rooms serve bedrooms. The relatively shortfall for winter sunlight is considered acceptable in this case taking account of the good overall levels annually.

9.12 Hurdwick House

9.13 VSC and NSL

- 9.14 19 out of 24 rooms (79%) meet BRE Guidelines for both VSC and NSL. The impacted windows and rooms are located on the ground, first, second and third floors. Of the 48 windows assessed for VSC, 43 (89.6%) will comply with BRE Guidelines. Of the five remaining windows, one sees a transgression of 22.4% against a 20% target and another sees a 34% loss which is considered moderate. The remaining three windows experience transgressions between 43.2-100% however the window which sees a 100% alteration has an existing VSC of 0.1%. Each of the five windows impacted serve rooms which have additional windows. Three rooms would have their mean comply with BRE criteria. The remaining two rooms will experience reductions of 26.6% and 22.3% which are minor.

- 9.15 In terms of NSL, all 24 rooms will meet BRE criteria.

9.16 Sunlight (APSH)

- 9.17 13 out of 16 rooms relevant for assessment meet BRE guidance (81.3%). The affected rooms experience no change in Winter PSH. The three impacted rooms are on ground, first and second floors (bottom three in light green in

image below) For annual PSH, two rooms are below the 25% target in the existing condition but will experience a 40% alteration. All the rooms are served by mitigating windows but these face north. Given these windows serve living rooms, the change would be noticeable; however, given the close proximity of the site and two of the three rooms already having sunlight below guidance, it is considered that the transgressions are acceptable. The loss of sunlight is something that occupants would notice in those rooms, but this is acceptable because of the proximity to the open development site. To not have that impact would result in no or likely single storey development.



Figure 3 – Window maps, three bottom windows affected in terms of APSH

9.18 263 Eversholt Street

9.19 Six rooms out of seven would comply with VSC and NLS targets. The two windows see transgressions of 25% and 24.6% which is minor and both have in excess of 17% retained VSC.

9.20 267 Eversholt Street

9.21 Nine rooms out of ten rooms would comply with VSC and NLS targets. One room which fails the NLS target with 27.9% reduction against a 20% target is minor. All rooms comply with APSH.

9.22 269 Eversholt Street

9.23 Nine out of eleven rooms comply with BRE targets for VSC and NSL. All rooms comply with VSC and the transgressions for the two rooms which fail NSL are

minor (28.5%) and moderate (35.5%). The rooms have 58% and 69% daylight distribution. All eleven rooms comply with ASPH targets.

#### 9.24 Conclusion

9.25 The transgressions against the guidance are limited and generally quite small and are inevitable given the existing site has no built development and is vacant. It would not be possible to develop the site to deliver much-needed housing without some transgressions or significantly reduce the height and, therefore, the quantum of housing provided on site.

#### 9.26 Overlooking

9.27 The proposed building has been designed to reduce any impact from neighbouring residential dwellings. It faces the windows away from Hurdwick House, so the outlook is away from any habitable rooms. The balconies proposed have been inset within the building envelope rather than projecting, so they are set back further away from the neighbouring properties.

9.28 The proposed building is approximately 10m from the rear of the existing residential buildings. The building's layout limits direct views from the proposed habitable rooms to existing ones. The side elevation (east) faces the stair core of Hurdwick House, and therefore, there will be no overlooking into each property.

9.29 The building also backs onto the rear of the properties along Eversholt Street. The existing buildings consist of four storeys. The buildings that back onto the application site have a ground floor extension that borders the car park area. The ground floor area is for commercial uses, so there will be no overlooking into habitable rooms on the ground floor. The upper floors (first to the third floor) are residential. However, the distance between the proposed building (the closest habitable room) and the rear of this building is approximately 25m (above the 18m distance recommended in CPG Amenity). The proposed building and the existing buildings along Eversholt Street would be separated by the car park to be retained, thus creating a further sense of separation and obscuring views between the proposal and existing residential dwellings.





Figure 4 – Proposed site plan showing distances to properties on Eversholt Street

## 10. HERITAGE

### ***Designated and non-designated heritage assets***

- 10.1 Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out that special regard must be given to preserving or enhancing the character or appearance of the conservation area.
- 10.2 The site lies on the boundary of the two sub-areas of the Camden Town conservation area. The building is within the residential sub-area, which is characterised by late eighteenth and early nineteenth-century terraces of townhouses constructed from stock brick and stucco. Just to the north lies the commercial sub-area, which features a more diverse range of uses and building styles. The buildings within the residential sub area are of both historic and architectural interest as examples of planned domestic housing from the mid-nineteenth century. They are particularly of note for their townscape value, due

to their detailed and well-proportioned façade which was designed to tie in with buildings in the wider area.

- 10.3 Mornington Crescent underground station is of both architectural and historic interest as a result of its association with the provision of a London-wide public underground transport system in the early twentieth century. Architecturally the building has townscape value due to its prominent corner location and distinctive design using maroon glazed tiles.
- 10.4 The site sits opposite Harrington Square Gardens with 'Greater London House', the former Carreras Tobacco Factory to the west of Hampstead Road and Harrington Road Gardens. This is a positive contributor to the CA and a distinctive example of Egyptian Revival style. A map of the conservation area and listed buildings is below.

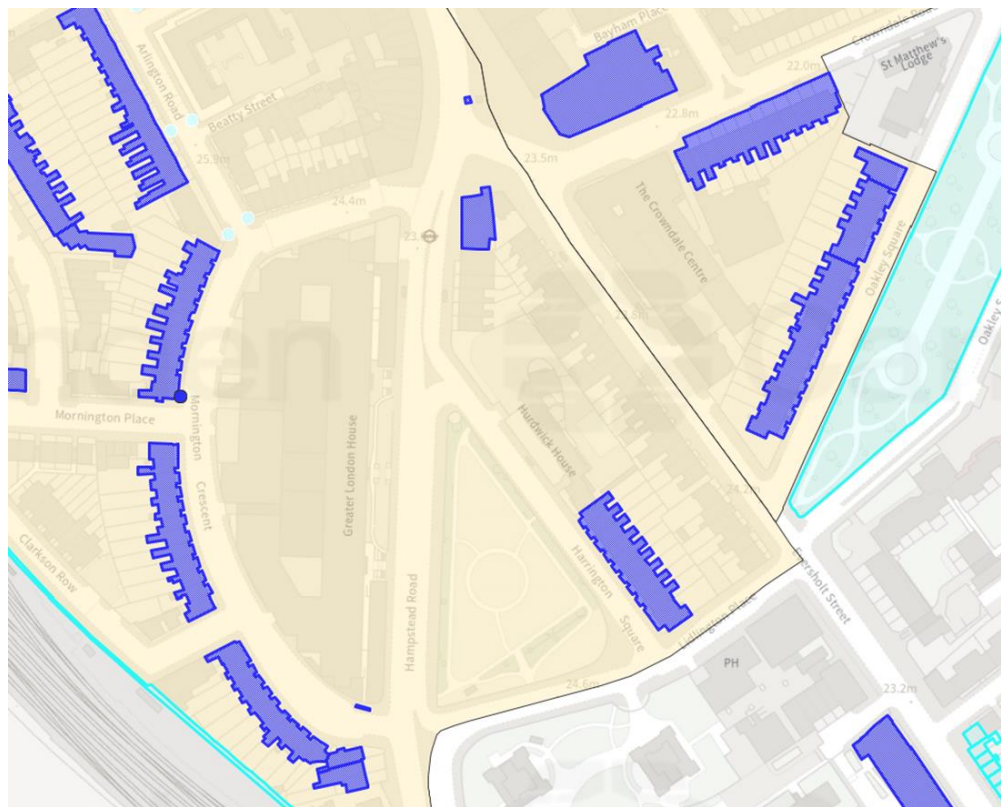


Figure 4 - Map of heritage assets (Camden Town CA, in yellow and listed buildings in blue)

- 10.5 The CAAMS describes Harrington Square as the following (summarised):  
*“Harrington Square has been much altered. It was originally laid out as planned mid-19<sup>th</sup> Century composition, comprising two terraces overlooking a triangular open space. Part of the east side remains, a stucco-trimmed yellow stock brick terrace dating to 1834 with arched first-floor windows set in stucco panels. The northernmost stretch of this terrace was destroyed by World War II bomb damage, and has been replaced by.. Hurdwick House,*

*which does not attempt to blend with its historic character... Nonetheless, Harrington Square Gardens are the most significant green space within the Conservation Area.”*

- 10.6 Historic maps show that the east side of Harrington Square was originally a continuous terrace of houses, probably identical in appearance to either those found immediately to the north and south. Bomb damage maps from the Second World War reveal that the houses on the site were heavily damaged and demolished and replaced with Hurdwick House and the car park.
- 10.7 The conservation area appraisal notes on page 26 that Hurdwick House does not attempt to blend with its historic neighbours. Neither the building or the car park is noted as making either a positive or negative contribution to the conservation area, therefore their contribution is to be judged neutral. However the remaining terraces on Hurdwick Place to the north and Eversholt Street to the east are identified as making a positive contribution and are Grade II Listed.
- 10.8 In this context there is the opportunity to develop the car park with a building that responds to its immediate context and help repair the gap in the townscape on the eastern side of Harrington Square.

#### ***Proposed development***

- 10.9 The proposed building has been articulated to fit comfortably into its context and follows the consistent four-storey parapet line (with a varying parapet to the central bay) set by Hurdwick Place adjoining the site. Therefore, the height responds to the long horizontal forms that characterise this part of the conservation area. This reinforces the massing that would have existed on the site prior to bomb destruction during WW2.
- 10.10 Although the building will be a storey taller than either Hurdwick House and Hurdwick Place, the top floor will be set back to give it a degree of subservience. When looking at the immediate context, there is not a consistent building height along the eastern edge of Harrington Square. Hurdwick House is lower, and set back further, than the neighbouring Victorian terraced houses which creates some variation in the townscape. Additionally, the heights around Harrington Square, which form part of the context, are much more varied than in other parts of the conservation area. Looking at the wider conservation area, it is not unusual to see variations of one storey in height between terraces of Victorian houses, sometimes in the form of a subservient attic storey.
- 10.11 In conclusion, special attention has been paid to the desirability of preserving or enhancing the character or appearance of the conservation area, under s.72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended by the Enterprise and Regulatory Reform Act 2013. The proposal is considered to enhance the character and appearance of the conservation area through restoring the built development to an appropriate scale and design. The high quality of the design of the scheme is discussed in more detail below.

10.12 Special regard has been attached to the desirability of preserving the setting of neighbouring listed buildings, under s.66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended by the Enterprise and Regulatory Reform Act 2013.

## **11. DESIGN**

11.1 Design Review Panel - two DRP meetings occurred during the pre-application stage of the proposals evolution (January 2023 & June 2023). There were extensive revisions to the scheme made following the DRP and officer feedback. The revisions made include:

- Profiled precast cladding replaced with glazed sawtooth brickwork at ground floor.
- Ground floor level raised with the introduction of ramped entrance bridges
- All entrances at ground floor recessed to add greater depth and a covered entrance to the ground floor façade. Detailed reconstituted stone framing to the central entrance with projected balcony above.
- Decoration of full height windows added at first floor level with the introduction of projected white glazed window framing in reference to neighbourhood terraces.
- Variation of bay widths and added façade depth with the introduction of a projected central bay.
- Horizontal banding removed at second floor. In reference to surrounding terrace typologies, horizontal elements emphasized at first floor through change in materiality and third floor through subtle change in brick bonding.
- Variation of window heights introduced to add a vertical hierarchy to the façade and reduce the perceived 'warehouse' typology.
- Raised parapet of central bay with brick detailing to signify central 'crown' and to create variation to the parapet across the Harrington Square elevation.
- Profile of top set back storey updated with central section forming a visual continuation of the celebrated central bay. Set back 'wings' either side.
- Corner brickwork detail continuing up to top floor in reference to curved Hurdwick House Balconies.
- Second meeting was a Chairs Review focusing on specific details including the layout on the ground floor and the façade treatment.

11.2 The proposed street-facing façade responds well to its context, closely referencing the proportions and rhythm of the adjoining buildings on Hurdwick Place, reinterpreted in a contemporary way. Levels of window opening, a contrasting ground floor and the hierarchy of the façade treatment line through along with expressed horizontal banding, but the proposal utilises materials and detailing that are distinctly modern.



Figure 5 – Visual of the front from Hampstead Road

- 11.3 As a block of flats, rather than a series of vertical townhouses, it is appropriate that it does not read a simply an exact replica of the terraced house at Hurdwick Place and that the internal layouts are expressed in the façade design. In this case, the central part out of the façade is pulled forward to create a legible entrance with a generous porch. This is a common language within Victorian town house development as variation between different terraces or the accentuation of the central or end portions of a terrace. In this context the proposed design will sit comfortably.
- 11.4 The composition includes a decorative ground floor, brick detailing, a clear hierarchy of windows ascending the elevations, and ornamental metalwork. The façade has a raised ground floor to align with the neighbouring terrace and create well-proportioned space within. The façade has varied bay widths as it is split into three sections with the central bay adding depth and a raised decorative parapet to break up the horizontality of the façade, highlighting the central entrance and providing visual interest. The windows have a variation in height to add vertical hierarchy and respond to the neighbouring listed terrace. They are detailed with white reconstituted stone framing and arched recon stone spandrels to window heads. These elements have been developed through study of nearby precedents that have similar features.
- 11.5 As noted above, the top floor is expressed as a setback storey with a central section forming a continuation of the central bay below. The set-back area

provides a full-length terrace onto Harrington Square, with planting that will complement the greenery found across the road.

- 11.6 A curved corner treatment is used on the southern end of the block neighbouring Hurdwick House. This has been included to reference the curved balconies of the Hurdwick House façade and is also a common treatment for the ends of the terraced facades within the conservation area.
- 11.7 The ground floor flats have street access from Harrington Square, flanking the primary central entrance. This will provide good activation along the street edge. Front gardens provide an element of privacy and defensible space to the living rooms and bedrooms facing the street. All entrances are recessed, picking up the semi-recessed doorways to Hurdwick Place. The main entrance has an increased width and a reconstituted stone portico. The material palette is a London yellow stock brick, glazed sawtooth brick for the ground floor, and ornate black metal railings.

## 12. SUSTAINABILITY AND ENERGY

- 12.1 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.
- 12.2 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.

### Energy and carbon summary

- 12.3 The following summary table shows how the proposal performs against the policy targets for carbon reductions in major schemes, set out in the London Plan and Camden Local Plan.

Policy requirement (on site)	Min policy target	Proposal reductions
Total carbon reduction: LP policy SI2 and LP CC1	35%	68.39 %
Be lean stage (low demand): LP policy SI2	10%	57.08%%
Be green stage (renewables): CLP policy CC1	20%	11.3 %

*Table 5 - Carbon saving targets for majors and the scheme results*

### Total carbon reductions

- 12.4 Reductions are measured against a 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). The remainder of the carbon savings to 100% reduction (zero carbon) should then be secured through a carbon off-set payment. This is charged at £95/tonne CO<sub>2</sub>/yr (over a 30 year period) which is spent on delivery of carbon reduction measures in the borough.

- 12.5 Residential development should be exceeding the target now, so GLA guidance has introduced a more challenging aspirational target of 50% on-site total savings that residential development should aim to achieve.
- 12.6 In this case, the development significantly exceeds the policy target of 35% reductions, achieving an overall on-site reduction of 68.3% improvement on Part L requirements as shown in Table 5 above. A **carbon offset of £11,314.50 (3.97 tonnes £95 per tonne for 30 years) will be secured by Section 106 legal agreement** to bring it to zero carbon, in compliance with the development plan.

Be lean stage (reduce energy demand)

- 12.7 London Plan policy SI 2 sets a policy target of at least a 10% reduction through reduced energy demand at the first stage of the energy hierarchy.
- 12.8 In this case, the development significantly exceeds the policy target of 10% reducing emissions by 57 % at this stage through energy efficient design, in compliance with the development plan. The proposals involve high performance insulation, low air permeability, efficient glazing, and addresses the requirements of the cooling hierarchy and overheating which can avoid the use of active cooling in the development. The proposal includes energy efficient measures like MVHR, Waste Water Heat Recovery and low energy light fittings.

Be clean stage (decentralised energy supply)

- 12.9 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.
- 12.10 In this case, an assessment of the existing London heat map has been made, and it has been demonstrated that no existing local networks are present within the scheme's connectable range.

Be green stage (renewables)

- 12.11 Camden Local Plan policy CC1 requires all developments to achieve a 20% reduction in CO<sub>2</sub> emissions through renewable technologies (after savings at

Be Lean and Be Clean), where feasible, for the third stage in the energy hierarchy.

- 12.12 In this case, the development does not meet the Local Plan policy CC1 target of 20%, reducing emissions by 11% at this stage through renewables, specifically PV panels and an Air Source Heat Pump. It has been demonstrated not to be feasible and the proposal has maximised PV panels on the roof with full details secured by condition. A condition will be added to secure a meter to monitor the energy output from the approved renewable energy systems (condition 18 for PV and 19 for the Air Source Heat Pump). The proposal includes low carbon heating like Air Source Heat Pumps (ASHPs), other measures proposed on the roof of the building.

Be seen (energy monitoring)

- 12.13 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, which would be secured through the S106 Energy Plan. The proposal includes building management system / energy monitoring equipment. The S106 Agreement will secure reporting to the GLA and in the event of performance not being met an action plan to be submitted to and approved by the GLA.

***Climate change adaption and sustainable design***

- 12.14 The proposal includes sustainable drainage, biodiverse roofs and blue roofs. It has considered and mitigated overheating through the application of the cooling hierarchy. The proposal uses passive measures like deep window reveals, balconies, external shading, high performance glass, aspect to avoid or minimise active cooling (air con) in line with policy CC2.

***Flooding and sustainable urban drainage systems (SUDS)***

- 12.1 The development plan (CLP policy CC3 and LP policy SI12 and SI13) also 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.
- 12.2 The site is not located in a Local Flood Risk Zone or on a previously flooded street; therefore, Flood Risk Assessment is not required. No surface water sewer in proximity can be used as the discharge point. The applicant has provided details of the SUDS which includes the storage volume of the raingardens. The storage volume of the blue roof is to be secured by condition 21. Details of the sustainable drainage system, including an attenuation tank, blue roofs, and rain gardens, provide a minimum attenuation volume of 20m<sup>3</sup> in total, which will be secured by condition 20.
- 12.3 The blue roof is integrated with the solar panels, which would enhance the site's biodiversity and reduce water runoff. A condition will secure details of the SuDS



with blue/green roof system. Condition 10 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. Flood risk is covered in the 'Flood risk and drainage' section of this report.

### **13. AIR QUALITY**

- 13.1 According to Policy CC4 (Air quality), the Council will ensure that the impact of development on air quality is mitigated and that exposure to poor air quality is reduced in the borough. The Council will consider the impact of air quality when assessing development proposals, by considering both the exposure of occupants to air pollution and the effect of the development on air quality.

#### ***Operational impact of development on the local area***

- 13.2 The proposal is intended to be heated through non-combustion Heat Pump systems, which is welcomed in this area of poor air quality. An uninterruptible power supply (UPS) will provide emergency power (there will be no life-saving diesel generators installed on site). Mechanical ventilation with NOx filtration would be provided, and the location of the inlets would be secured by condition. The inlet locations will need to be located away from Harrington Square and above ground floor level.

#### ***AQ Neutral and impact on occupants***

- 13.3 The heat pumps mean the building emissions are considered air quality neutral. There is no parking on site and the impact on traffic activity is expected to be negligible therefore the transport emissions are air quality neutral. Overall, the development is air quality neutral, which meets Local Plan Policy requirements.
- 13.4 The site is below the Air Quality objective for NO<sub>2</sub>; therefore impact on occupants is expected to be negligible.

#### ***Construction Impacts Risk Assessment***

- 13.5 The area is very sensitive to dust, which could settle on surfaces and cause issues like dirt on windows or other surfaces. However, in this case, there's a low chance that dust levels will reach a point where they cause noticeable problems. So, while it's important to monitor, the actual risk of dust becoming an issue here is low overall.
- 13.6 All measures relevant to the high dust risk for earthworks, construction and track-out should be incorporated in the CMP.
- 13.7 A condition would require that no non-road mobile machinery (NRMM) 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)

## **14. BASEMENT**

- 14.1 Camden Local Plan Policy A5 requires basement proposals to have a minimal impact on, and be subordinate to, the host building and property and the architectural character of the building. There is no existing “host” building on site, being a vacant car park.
- 14.2 Basement size limitations
- 14.3 Policy A5 requires the siting, location, scale and design of basements to have minimal impact on and be subordinate to the host building and property. Policy A5 and CPG Basements Table 1 sets out criteria (f. to m.) regarding the size of basements. The basement is for a plant area and is smaller than the footprint of the building and as such it complies with the policy A5 size criteria.
- 14.4 Basement Impact Assessment (BIA)
- 14.5 Policy A5 also requires basement development not to cause harm to neighbouring properties; structural, ground, or water conditions; character and amenity of the area; and significance of heritage assets. The applicant has submitted a BIA subject to independent verification by Campbell Reith, who issued their final audit report in March 2024 confirming that the BIA has been prepared per Policy A5 and CPG Basements. Campbell Reith issued their BIA audit report in March 2024 confirming that the hydrogeological/hydrological impact and risk of groundwater flooding, flooding from sewers and surface water is minimal. The Ground Movement Assessment (GMA) has been revised and additional clarification information is provided to demonstrate the damages to neighbouring buildings due to the proposed basement will not exceed Burland Category 1 (Very Slight).
- 14.6 The BIA acknowledges that the two structural methods and sequence are subject to detailed design by the chosen contractor. As such, the details of the temporary works and construction methods will be confirmed as part of a Basement Construction Plan (BCP), and the GMA revised as necessary.
- 14.7 A condition is attached to require that the basement development is implemented in accordance with the approved BIA construction methods. A condition would require the appointed qualified engineer 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 to be checked and approved by a building control body. It is therefore considered the proposals are compliant with Policy A5.

## **15. OPEN SPACE**

- 15.1 The Local Plan requires an ‘appropriate contribution’ to open space, prioritising publicly accessible open space. Policy A2 prioritises securing new public open

space on-site, with the provision of space off-site near the development acceptable where on-site provision is not achievable. If there is no realistic means of direct provision, the Council may accept a financial contribution in lieu of provision. CPG Public Open Space states that developments exceeding 1,000m<sup>2</sup> in floorspace will be expected to contribute towards open space and play facilities. Policy A2 part m applies 9m<sup>2</sup> per occupant for residential in terms of on-site provision. Occupation for this assessment is calculated based on the yield for the ward, which is contained within Appendix E of CPG Public open space. In this instance, the site is within the Regents Park Ward, which yields an average household size of 2.33 people. A financial contribution is required towards providing, maintaining, and improving existing open space in the area.

- $9 \text{ sqm} \times 2.33 \times 11 \text{ dwellings} = 230.7 \text{ sqm}$  is the public open space requirement.
- Capital costs  $(9 \text{ sqm} \times 2.33 \times 11) \times \text{£}200 = \text{£}46,140$
- Maintenance costs at  $\text{£}7$  per sqm over 10 years is  $230.7 \times \text{£}70 = \text{£}16,149$
- The total sum payable for the residential component of the proposal = **£62,289 (POS)**

## 16. TRANSPORT

- 16.1 Cycle parking is provided in accordance with London Plan standards and Policy T1 of the Camden Local Plan (including the 20% uplift required by CPG Transport), with 24 spaces provided at ground floor level in two-tier racks in a cycle store on the right-hand side of the building. This would be accessed via the crossover and entrance to the car park of Hurdwick House. It is considered that there would be no safety issues arising from conflicts between the use of this access by cyclists and motor vehicles, given the low number of parking spaces provided for Hurdwick House (5).
- 16.2 An additional Sheffield cycle stand (2 spaces) would be placed adjacent to the car park entrance for visitors on the ground floor. The provision of the 24 long-stay and 2 short-stay cycle parking spaces would be secured by condition.
- 16.3 All 11 residential units should be secured as on-street residents' parking permit (car) free by means of a Section 106 Agreement. This will prevent future occupants from adding to existing on-street parking pressures, traffic congestion and air pollution whilst encouraging the use of more sustainable modes of transport such as walking, cycling and public transport.
- 16.4 A draft Travel Plan has been submitted in support of the application; however, it is not a policy requirement for this scale of development, so it is not secured under the S106 agreement.
- 16.5 Given the increased pedestrian and cyclist activity at the site, a Section 106 contribution of  $\text{£}22,000$  would be secured towards the provision of improved

Pedestrian, Cycling and Environmental facilities in the area surrounding the site.

- 16.6 Servicing and deliveries to the site will take place as at present, from the single yellow lines outside the site on Harrington Square. It is therefore considered unnecessary to secure a draft Servicing Management Plan by means of the Section 106 Agreement.
- 16.7 The CMP Implementation Support Contribution would be £10,116 and the Impact Bond is £16,000. These will be secured by means of the Section 106 Agreement, in order to ensure that the development is carried out without unduly harming neighbouring amenity or the safe and efficient operation of the local highway network, in accordance with Policy A1 of the Camden Local Plan.
- 16.8 Given that the footway and crossover to the site are likely to become damaged during the excavation and construction works, it will be necessary to secure a highway contribution of £47,220.54 by means of the Section 106 Agreement for repaving them.
- 16.9 The basement excavation required for the plant room and access stairs is sufficiently far away from the public highway that an Approval in Principle is not required.
- 16.10 The refuse store is located at the rear of the site and has been designed to accommodate recycling, refuse and food waste. The bins will need to be brought out to Harrington Square for collection by the management company.

## **17. BIODIVERSITY NET GAIN (BNG)**

- 17.1 The application was made before the first day of mandatory BNG, which was 12 February 2024. Thus, the development is exempt from BNG.
- 17.2 In terms of biodiversity and policy A3, the proposal provides a green roof and soft landscaping around the building. Details of the hard and soft landscaping and means of enclosure of all un-built space would be secured by condition.

## **18. FIRE SAFETY**

- 18.1 The proposal is a major development since it comprises more than 10 dwellings and therefore requires a D12 fire statement under the London Plan prepared by a suitably qualified third-party assessor. The building is not a “*relevant building*” under Planning Gateway One as it is below 18m in height and less than seven storeys. Policy D5 of the London Plan requires the highest standards of accessible and inclusive design to be met, Point 5 of the policy states development proposals should be designed to incorporate safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum at least one lift per core (or more subject

to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building.

- 18.2 The building is served by a single stair core, with a ventilated lift lobby and an unventilated portion of corridor, as per guidance, serving apartments. The single stair will not connect to the basement. The topmost storey is more than 11m but less than 18m in height from the access level, with the topmost storey measuring 13m above the access level.
- 18.3 Due to having a storey over 11m above ground, a sprinkler system designed and installed in accordance with BS 9251: 2021, which are limited to 100m<sup>2</sup> in compartment size.
- 18.4 The Fire Report agrees with the overall design proposals and conclusion presented in the drawings for the proposed works can be developed to satisfy the functional requirements of the Building Regulations. These measures would be controlled under Building Regulations regime.
- 18.5 It is considered that the scheme meets London Plan Policy D12 and D5 and gives respect to the proposed changes to Fire Safety in Draft BS 9991: 2021.

## **19. ECONOMIC BENEFITS, LOCAL EMPLOYMENT AND PROCUREMENT**

- 19.1 As the increase in floorspace is not linked to employment floor space, there is no eligibility for a Section 106 contribution. As this is a residential development, there will be no end use phase.

### **19.2 Construction Phase**

- 19.3 Apprenticeships - as the build cost for this scheme will exceed £3 million the applicant must recruit **1 construction apprentice paid at least London Living Wage per £3million of build costs and pay the council 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 King's Cross Construction Skills Centre. Once we have the exact build cost, we can determine the number of apprentices. At £5.8 million, this would be rounded to **2 construction apprentices and support fee of £3,400**
- 19.4 Local Recruitment – our standard local recruitment target is **20%**. The applicant should work with the Kings Cross Construction Skills Centre to recruit to vacancies, advertising with us for no less than a week before the roles are advertised more widely.
- 19.5 Local Procurement – The applicant must also sign up to the **Camden Local Procurement Code**, as per section 61 of the Employment sites and business premises CPG. Our local procurement code sets a target of **10%** of the total value of the construction contract.

## **20. LAND CONTAMINATION**

- 20.1 Historical land uses on site include buildings from 1873 to 1916-1957 and an electrical railway station. The current-day car park was present from circa 1916-1999 to present day. Railway tracks associated with the Northern Line were present to the west of the site, along with a Tobacco Works (mapped by 1952). An obsolete fuel station was present 54m to the north, and an underground station is present 38m north.
- 20.2 Potential sources of contamination on site identified include:
- Made ground associated with the former developments
  - Ground gas from possible Alluvium
- 20.3 The submitted land contamination report has indicated a low-negligible risk to human health from on-site and off-site sources of contamination, given the proposed development does not include soft landscaped areas.
- 20.4 The risk from ground gases has been identified as Low to Moderate given the potential for made ground beneath the site, and potential alluvium deposits, and the report makes recommendations for a site investigation to assess the actual risk from ground gases.
- 20.5 The Phase I report is satisfactory, and it is agreed that there is a potential unacceptable risk associated with ground gases on the site. A site investigation including installation of gas monitoring standpipes should be undertaken, with monitoring completed to allow both a human health and ground gas risk assessment to be undertaken for the site. As such, a condition is added.

## **21. COMMUNITY INFRASTRUCTURE LEVY (CIL)**

- 21.1 The scheme will be CIL liable. The CIL applies to all proposals which add 100m<sup>2</sup> of new floorspace or an extra dwelling. The amount to pay is the increase in floorspace (m<sup>2</sup>) multiplied by the rate in the CIL charging schedule.
- 21.2 Liable 1381.00 (affordable housing relief)
- 21.3 MCIL2 Band 1 - £80 Net
- 21.4 CCIL2 Residential GTR & EQ 10 – Zone B - £322
- 21.5 Total charge £590,222.72

## **22. CONCLUSION**

- 22.1 The scheme delivers 11 new homes on a brownfield site in a highly sustainable location with one ground floor 3-bedroom home delivered at London Affordable rent and with a £300K financial contribution towards the Council's affordable

housing fund. Given the council's current housing delivery position, significant weight should be given to the housing delivery. The scale and design are contextual, responding to the surrounding buildings' heights and historic context in a contemporary way. The DRP has endorsed the design. The development comfortably exceeds minimum space standards and would provide a high-quality living environment for future occupiers. The scheme is highly sustainable and complies with adopted energy and sustainability targets within the development plan and there would be no harm to neighbouring amenity.

### ***Public benefits***

22.2 No harm has been identified to heritage assets, but if the committee decides there is harm, a number of public benefits could outweigh that harm.

- Delivery of 11 new homes
- Delivery of a 3 bedroom home as at London Affordable Rent
- Affordable Housing contribution of £300k
- Development of a brownfield gap site
- Open space contribution
- Increased biodiversity on-site energy generation; and
- The provision of Community Infrastructure Levy contributions and other financial contributions to be secured through a Section 106 agreement.

## **23. RECOMMENDATION**

23.1 Grant conditional Planning Permission subject to a Section 106 Legal Agreement with the following heads of terms:

- The ground floor 3-bedroom unit provided at London Affordable Rent
- Affordable Housing PiL £300,000
- Open space contribution £62,289
- Construction management plan (CMP)
- CMP implementation support contribution of £10,116
- CMP Impact Bond of £16,000
- Pedestrian, Cycling and Environmental facilities contribution of £22,000
- Carbon offset contribution of £11,314.50
- Highways estimate of £47,220.54 for repaving the footway and crossover adjacent to the site
- Construction-related employment: local procurement and recruitment and 2 construction apprenticeships and associated support fee of £3,400
- Basement Construction Plan (BCP)
- Car free
- Energy and sustainability plan

**24. LEGAL COMMENTS**

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

**25. CONDITIONS**

1	<p>Three years from the date of this permission</p> <p>This development must be begun not later than three years from the date of this permission.</p> <p>Reason: In order to comply with the provisions of Section 92 of the Town and Country Planning Act 1990 (as amended).</p>
2	<p>Approved drawings</p> <p>The development hereby permitted shall be carried out in accordance with the following approved plans and documents:</p> <p>Architectural drawings</p> <p>0010 0010--SP0210-XX-XX-DR-A-0210P1, 0010--SP0220-XX-00-DR-A-0220P1, 0010-SP-XX-XX-DR-A-0550P1, 0010-SP-XX-XX-DR-A-0550P1, 0010-SP-XX-00-DR-A-0310, 0010-SP-XX-00-DR-A-7100, 0010-SP-XX-B-DR-A-0300P1, 0010-SP-XX-00-DR-A-0301P3, 0010-SP-XX-01-DR-A-0302P1, 0010-SP-XX-02-DR-A-0303P1, 0010-SP-XX-03-DR-A-0304P1, 0010-SP-XX-04-DR-A-0305P1, 0010-SP-XX-RF-DR-A-0306P2, 0010-SP-XX-XX-DR-A-0200P1, 0010-SP-XX-XX-DR-A-0500P3, 0010-SP XX-XX-DR-A-0502P1, 0010-SP-XX-XX-DR-A-0503P2, 0010-SP-XX-XX-DR-A-0501P3, 0010-SP-XX-XX-DR-A-2101P1, 0010-SP-XX-XX-DR-A-2102P1, 0010-SP-XX-XX-DR-A-2103P1, 0010-SP-XX-XX-DR-A-0201P1, 0010-2P-XX-XX-DR-A-2104P1</p> <p>Structural drawings</p> <p>HSC-REN-XX-00-DR-S-01100 P04, HSC-REN-XX-01-DR-S-01101 P04, HSC-REN-XX-02-DR-S-01102 P04, HSC-REN-XX-03-DR-S-01103 P04, HSC-REN-XX-04-DR-S-01104 P03, HSC-REN-XX-05-DR-S-01105 P03, HSC-REN-XX-06-DR-S-01106 P03, HSC-REN-XX-B1-DR-S-01080 P04, HSC-REN-XX-B1-DR-S-01090 P04</p> <p>Energy/Sustainability Drawings</p> <p>P1739-NOV-XX-B1-DR-ME-8001I3, P1739-NOV-XX-00-DR-ME-8001I3, P1739-NOV-XX-RF-DR-M-6001P02, Appendix B SAPS Reports Various, Part L 2021 GLA Carbon Emission Spreadsheet v2.0</p>



	<p>Landscape drawings</p> <p>L-1001 P01, LN00700P01, LN00700P01, L-1004 P01, L-4001 P01, L-4001, L-1001 P01</p> <p>Reports</p> <p>Air Quality Assessment P04 prepared by XC02, Basement Impact Assessment (BIA) 2874-A2S-XX-XX-RP-Y-0003-04, Energy and Sustainability Statement P1739-ES-001 Rev G prepared by Novo, Bituminous standard detail (Blue Roof) D0000-00W_BR_011-Ext-SL-S-D4_001, Outline drainage strategy P05, Below ground drainage general arrangement HSC-REN-ZZ-FN-DR-C-01100-P04, Proposed drainage area plan HSC-REN-XX-00-DR-C-00060-P03, Hurdwick House, Camden Arboricultural Development Report TF1228-FAB-00-XX-RP-G-8301 prepared by Fabrik, Daylight &amp; sunlight prepared by GIA, Tree Removal and Arboricultural Impact Assessment Plan - Sheet 1 of 1 TF1228 FAB 00 XX DR G 8301 P01, Hurdwick House Arboricultural Survey TF1228-FAB-00-XX-RP-G-8201, Landscape Report November 2023, Biodiversity Survey and Report prepared by Ecology Partnership;</p> <p>Financial Viability Assessment prepared by BNP Paribas, Servicing and Waste Management Plan, Residential Travel Plan and Transport Statement (including waste storage and collection), prepared by Caneparo Associates, Landscape management plan prepared by Outerspace, Planning Statement, Heritage Impact Assessment, Statement of Community Engagement (SCE) prepared by WSP, Phase I Geo-Environmental Assessment Report, Design and Access Statement prepared by Studio Power, Health Impact Assessment, (Draft) Construction Management Plan, prepared by Caneparo Associates, Noise Assessment prepared by KP Acoustics, Fire Strategy, prepared by Marshall Fire, Flood Risk Assessment and Sustainable Drainage Systems (SuDS) Strategy, prepared by Renaissance; Contamination Report prepared by Renaissance,</p> <p>Reason: For the avoidance of doubt and in the interest of proper planning.</p>
3	<p>Design details</p> <p>Before the relevant part of the work is begun, 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:</p> <p>a) Before the brickwork is commenced, a sample panel of each elevation demonstrating the window reveal, proposed colour, texture, face-bond and pointing shall be provided on site and approved in writing by the local planning authority. The development shall be carried out in accordance with</p>

	<p>the approval given. The approved panel shall be retained on site until the work has been completed.</p> <p>b) Manufacturer's specification details of all facing materials (to be submitted to the Local Planning Authority) and samples of those materials (to be provided on site).</p> <p>The relevant part of the works shall be carried out in accordance with the details thus approved and all approved samples shall be retained on site during the course of the works.</p> <p>Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy D1 and D2 of the London Borough of Camden Local Plan 2017.</p>
4	<p>Land contamination – site investigation and remediation</p> <p>Part A:</p> <p>No development shall commence until a site investigation is undertaken and the findings are submitted to and approved in writing by the local planning authority.</p> <p>The site investigation should assess all potential risks identified by the desktop study and should include a generic quantitative risk assessment and a revised conceptual site model. The assessment must encompass an assessment of risks posed by radon and by ground gas. All works must be carried out in compliance with LCRM (2020) and by a competent person.</p> <p>Part B:</p> <p>No development shall commence until a remediation method statement (RMS) is submitted to and approved in writing by the local planning authority. This statement shall detail any required remediation works and shall be designed to mitigate any remaining risks identified in the approved quantitative risk assessment. This document should include a strategy for dealing with previously undiscovered contamination. All works must be carried out in compliance with LCRM (2020) and by a competent person.</p> <p>Part C:</p> <p>Following the completion of any remediation, a verification report demonstrating that the remediation as outlined in the RMS have been completed should be submitted to, and approved in writing, by the local planning authority. This report shall include (but may not be limited to): details of the remediation works carried out; results of any verification sampling, testing or monitoring including the analysis of any imported soil</p>

	<p>and waste management documentation. All works must be carried out in compliance with LCRM (2020) and by a competent person.</p> <p>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 offsite receptors, in accordance with policies G1, D1, A1, and DM1 of the London Borough of Camden Local Plan 2017.</p>
5	<p>Cycle parking</p> <p>The approved facility for 24 long stay and 2 short stay cycle parking spaces shall be provided in its entirety prior to first occupation of any of the new units, and permanently maintained and retained thereafter.</p> <p>Reason: To ensure the development provides adequate cycle parking facilities in accordance with the requirements of policy T1 of the London Borough of Camden Local Plan 2017.</p>
6	<p>Green roof details</p> <p>Prior to commencement of development, full details in respect of the living roof in the area indicated on the approved roof plan shall be submitted to and approved by the local planning authority. The details shall include</p> <ol style="list-style-type: none"> <li>i. a detailed scheme of maintenance</li> <li>ii. sections at a scale of 1:20 with manufacturers details demonstrating the construction and materials used and showing a variation of substrate depth with peaks and troughs</li> <li>iii. full details of planting species and density</li> </ol> <p>The living roofs shall be fully provided in accordance with the approved details prior to first occupation and thereafter retained and maintained in accordance with the approved scheme.</p> <p>Reason: In order to ensure the development undertakes reasonable measures to take account of biodiversity and the water environment in accordance with policies G1, CC1, CC2, CC3, CC4, D1, D2, and A3 of the London Borough of Camden Local Plan 2017.</p>
7	<p>Hard and soft landscaping details</p> <p>No development shall take place until full details of hard and soft landscaping and means of enclosure of all un-built, open areas have been submitted to and approved by the local planning authority in writing. The</p>

	<p>relevant part of the works shall not be carried out otherwise than in accordance with the details thus approved.</p> <p>Reason: To ensure that the development achieves a high quality of landscaping which contributes to the visual amenity and character of the area in accordance with the requirements of policies A2, A3, D1 and D2 of the London Borough of Camden Local Plan 2017.</p>
8	<p>Landscaping compliance</p> <p>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, whichever is the sooner. Any trees or areas of planting (including trees existing at the outset of the development other than those indicated to be removed) 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.</p> <p>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.</p>
9	<p>Water efficiency</p> <p>The development hereby approved shall achieve a maximum internal water use of 110litres/person/day. The dwelling/s shall not be occupied until the Building Regulation optional requirement has been complied with.</p> <p>Reason: To ensure the development contributes to minimising the need for further water infrastructure in an area of water stress in accordance with Policies CC1, CC2, CC3 of the London Borough of Camden Local Plan 2017.</p>
10	<p>Noise insulation between units</p> <p>Prior to commencement of the development, details shall be submitted to and approved in writing by the Council, of an enhanced sound insulation value <math>D_{nT,w}</math> and <math>L'_{nT,w}</math> of at least 5dB above the Building Regulations value, for the floor/ceiling /wall structures separating different types of rooms/ uses in adjoining dwellings, namely [eg. living room and kitchen</p>

	<p>above bedroom of separate dwelling]. Approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.</p> <p>Reason: To ensure that the amenity of occupiers of the development site is not adversely affected by noise in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017</p>
11	<p>Noise insulation from external sources</p> <p>All habitable rooms exposed to external road traffic noise in excess of 55 dBA Leq 16 hour [free field] during the day [07.00 to 23.00 hours] or 45 dBA Leq 8 hour [free field] at night [23.00 to 07.00 hours] shall be subject to sound insulation measures to ensure that all such rooms achieve an internal noise level of 35 dBA Leq 16 hour during the day and 30 dBA Leq 8 hour at night. The scheme shall ensure that habitable rooms subject to sound insulation measures shall be able to be effectively ventilated without opening windows. No dwelling shall be occupied until the approved sound insulation and ventilation measures have been installed to that property in accordance with the approved details. The approved measures shall be retained thereafter in perpetuity.</p> <p>Reason: To ensure that the amenities of future occupiers are protected in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017</p>
12	<p>BIA compliance</p> <p>The development shall not be carried out other than in strict accordance with the methodologies, recommendations and requirements of the Basement Impact Assessment Basement Impact Assessment (BIA) 2874-A2S-XX-XX-RP-Y-0003-04 dated January 2024 (audited on March 2024) hereby approved, and the confirmation at the detailed design stage that the damage impact assessment would be limited to Burland Category 1.</p> <p>Reason: To ensure proper consideration of the structural stability of neighbouring buildings and to safeguard the appearance and 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.</p>
13	<p>Basement engineer details</p> <p>The development hereby approved shall not commence until such time as a suitably qualified chartered engineer with membership of the appropriate professional body has been appointed to inspect, check for compliance with</p>

	<p>the design (as approved by the local planning authority and building control body) and monitor the critical elements of both permanent and temporary basement construction works throughout their duration. 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.</p> <p>Reason: To ensure proper consideration of the structural stability of neighbouring buildings and to safeguard the appearance and character of the immediate area in accordance with the requirements of policies D1, D2(if in CA) and A5 of the London Borough of Camden Local Plan 2017.</p>
14	<p>M4 (3) Accessible</p> <p>The ground floor 3-bedroom 5-person dwelling as indicated on the plan number 0010-SP-XX-00-DR-A-7100 hereby approved shall be designed and constructed in accordance with Building Regulations Part M4 (3) ACCESSIBLE (2b).</p> <p>Reason: To ensure that the wheelchair units would be capable of providing adequate amenity in accordance with policies: CS6 &amp; DP6 of Camden's Local Development Framework 2010.</p>
15	<p>Mechanical Ventilation</p> <p>Prior to commencement of development (excluding demolition and site preparation works), 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 and 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.</p> <p>Reason: To protect the amenity of residents in accordance with London Borough of Camden Local Plan Policy CC4 and London Plan policy SI 1.</p>
16	<p>Non-road mobile machinery</p> <p>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).</p>

	<p>Reason: To ensure that air quality is not adversely affected by the development in accordance with policy CC4 of the Camden Local Plan 2017, and policy GG3 and SI 1 of the London Plan.</p>
17	<p>PV panels</p> <p>Prior to commencement of above ground works (apart from site clearance), drawings and data sheets showing location, extent and predicted energy generation of photovoltaic cells and associated equipment to be installed on the building shall have been submitted to and approved by the Local Planning Authority in writing. The photovoltaic array should have a peak power output of at least 12kWp as detailed in the submitted Energy statement and Roof Plan. The measures shall include the installation of a meter to monitor the energy output from the approved renewable energy systems. A site-specific lifetime maintenance schedule for each system, including safe roof access arrangements, shall be provided. The cells shall be installed in full accordance with the details approved by the Local Planning Authority and permanently retained and maintained thereafter.</p> <p>Reason: To ensure the development provides adequate on-site renewable energy facilities in accordance with the requirements of policy CC1 (Climate change mitigation) of the London Borough of Camden Local Plan 2017.</p>
18	<p>Air Source Heat Pump</p> <p>Prior to commencement of above ground works apart from site clearance, 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 details shall demonstrate the ASHP system and any ventilation either has no active cooling function, or cooling deactivated by the manufacturer, or that it is an air to water heat pump system only supplying underfloor heating and/or oversized radiators. . The equipment shall be installed in full accordance with the details approved by the Local Planning Authority and permanently retained and maintained thereafter.</p> <p>Reason: To ensure the development provides adequate on-site renewable energy facilities in accordance with the requirements of policy CC1 of the London Borough of Camden Local plan Policies</p>

19	<p>SuDS: Further details</p> <p>Prior to commencement of development, full details of the sustainable drainage system including combination blue/green roof of at least 23.5m<sup>3</sup> attenuation volume &amp; attenuation tank of at least 9m<sup>3</sup> attenuation volume to 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, or on any part of the entire development site for up to and including a 1:30 year storm. The details shall demonstrate a site run-off rate conforming to a run-off rate of 2.0l/s in 1 in 100 year + Climate Change allowance rainfall event as approved by the Local Planning Authority. An up to date drainage statement, SuDS pro-forma, a lifetime maintenance plan and supporting evidence should be provided including:</p> <ul style="list-style-type: none"> <li>• The proposed SuDS or drainage measures including storage capacities</li> <li>• The proposed surface water discharge rates or volumes</li> </ul> <p>Systems shall thereafter be retained and maintained in accordance with the approved details.</p> <p>Reason: To reduce the rate of surface water run-off from the buildings and limit the impact on the storm-water drainage system in accordance with policies CC2 and CC3 of the London Borough of Camden Local Plan Policies and Policy SI 13 of the London Plan 2021.</p>
20	<p>SuDS: Evidence of installation condition</p> <p>Prior to occupation, evidence that the 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.</p> <p>Reason: To reduce the rate of surface water run-off from the buildings and limit the impact on the storm-water drainage system in accordance with policies CC2 and CC3 of the London Borough of Camden Local Plan Policies and Policy SI 13 of the London Plan 2021.</p>
21	<p>TfL Railway Infrastructure Protection</p> <p>The development hereby permitted shall not commence until the following documents, in consultation with London Underground, have been submitted to and approved in writing by the local planning authority which:</p>



	<ul style="list-style-type: none"> <li>a) accommodate the location of the existing London Underground structures;</li> <li>b) provide predicted load change (temporary and permanent) on London Underground structures considering demolition and construction stages;</li> <li>c) provide assessment of ground movement impact on London Underground structures due to temporary and permanent changes in loading associated with the demolition and construction of the proposed works (incl. long-term excavation (unloading) effects on-site);</li> <li>d) provide detailed design and Risk Assessment Method Statement (RAMS) on all works including temporary and permanent works;</li> <li>e) provide details on the use of tall plant, scaffolding, lifting equipment and cranes, if any;</li> <li>f) mitigate the effects of noise and vibration arising from the adjoining railway operations.</li> <li>g) No claims to be made against TfL or London Underground by the Local Authority, purchasers, tenants, occupants or lessees of the development for any noise or vibration resulting from London Underground running, operating and maintaining the adjacent railway.</li> </ul> <p>The development shall thereafter be carried out in all respects in accordance with the approved design and method statements, and all structures and works comprised within the development hereby permitted which are required by the approved design statements in order to procure the matters mentioned in paragraphs of this condition shall be completed, in their entirety, before any part of the development hereby permitted is occupied.</p> <p>Reason: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with London Plan 2021, draft London Plan policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012</p>
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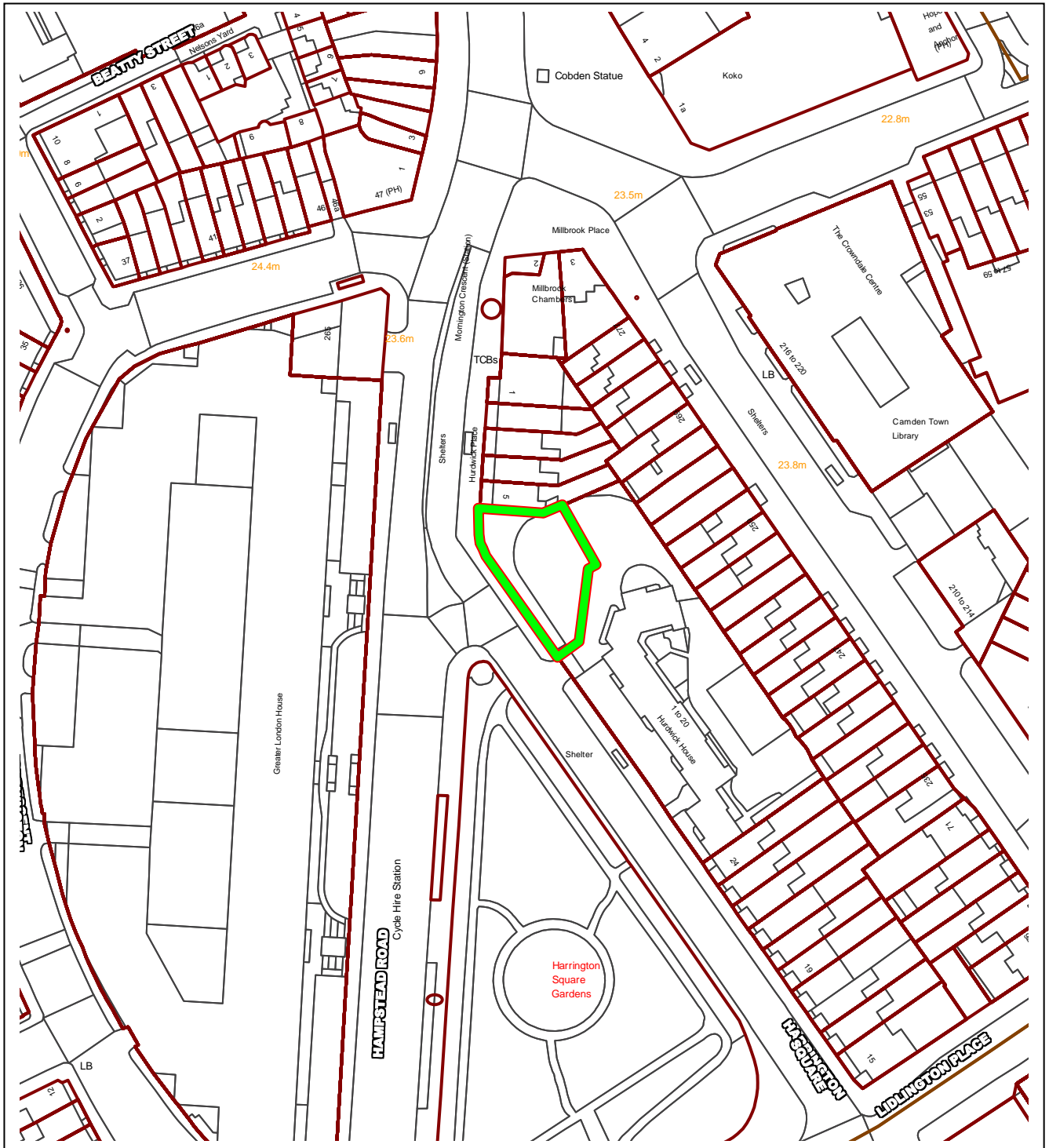
## 26. INFORMATIVES

1	<p>Your proposals may be subject to control under the Building Regulations and/or the London Buildings Acts that cover aspects including fire and emergency escape, access and facilities for people with disabilities and sound insulation between dwellings. You are advised to consult the Council's Building Control Service, Camden Town Hall, Judd St, Kings Cross, London NW1 2QS (tel: 020-7974 6941).</p>
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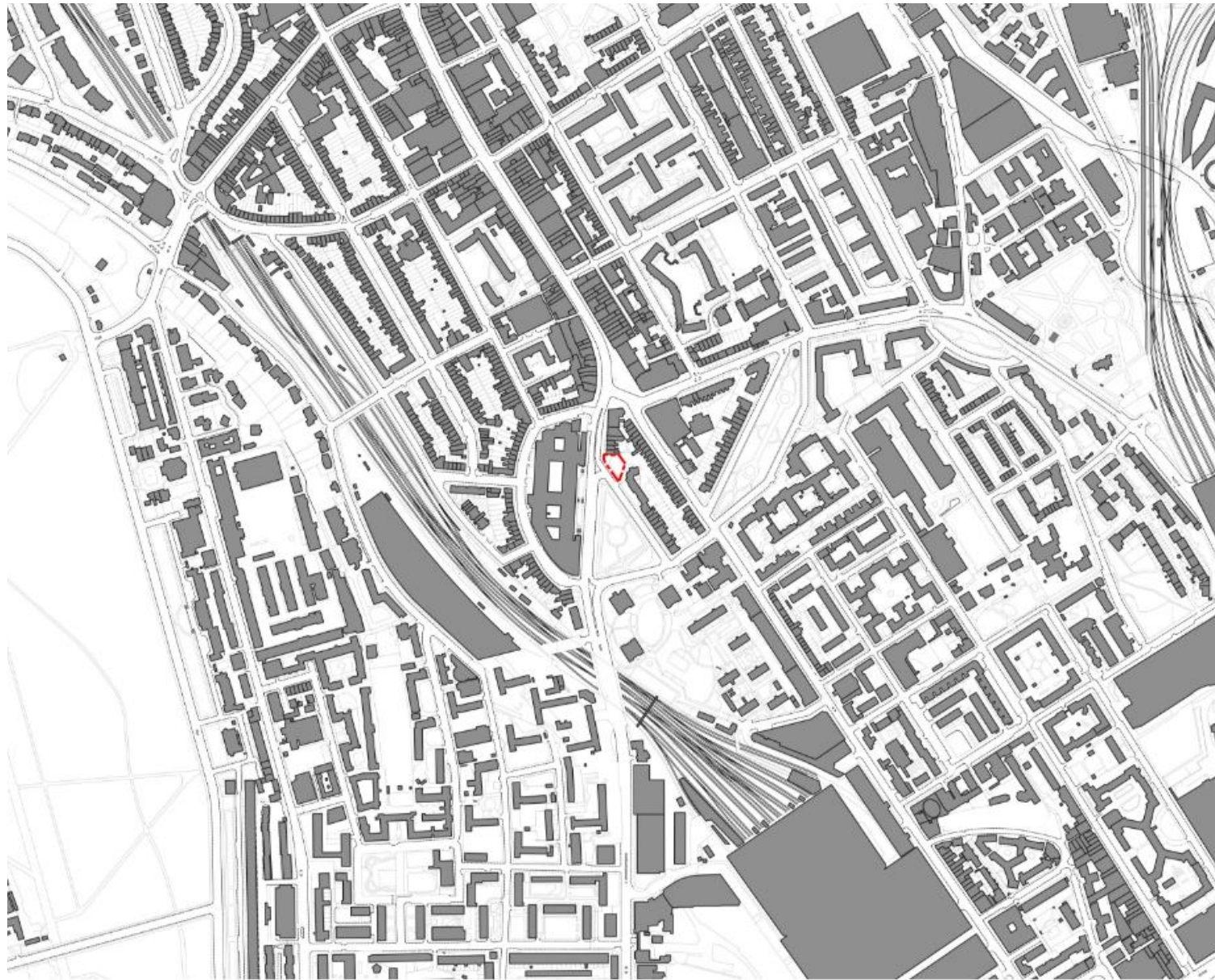
2	<p>Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. You are advised to consult the Council's Noise and Licensing Enforcement Team, Camden Town Hall, Judd St, Kings Cross, London NW1 2QS (Tel. No. 020 7974 4444 or search for 'environmental health' on the Camden website or seek prior approval under Section 61 of the Act if you anticipate any difficulty in carrying out construction other than within the hours stated above.</p>
3	<p>This proposal may be liable for the Mayor of London's Community Infrastructure Levy (CIL) and the Camden CIL. Both CILs are collected by Camden Council after a liable scheme has started, and could be subject to surcharges for failure to assume liability or submit a commencement notice PRIOR to commencement. We issue formal CIL liability notices setting out how much you may have to pay once a liable party has been established. CIL payments will be subject to indexation in line with construction costs index. You can visit our planning website at <a href="http://www.camden.gov.uk/cil">www.camden.gov.uk/cil</a> for more information, including guidance on your liability, charges, how to pay and who to contact for more advice.</p>
4	<p>This approval does not authorise the use of the public highway. Any requirement to use the public highway, such as for hoardings, temporary road closures and suspension of parking bays, will be subject to approval of relevant licence from the Council's Streetworks Authorisations &amp; Compliance Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No 020 7974 4444). Licences and authorisations need to be sought in advance of proposed works. Where development is subject to a Construction Management Plan (through a requirement in a S106 agreement), no licence or authorisation will be granted until the Construction Management Plan is approved by the Council.</p>
5	<p>All works should be conducted in accordance with the Camden Minimum Requirements - a copy is available on the Council's website (search for 'Camden Minimum Requirements' at <a href="http://www.camden.gov.uk">www.camden.gov.uk</a>) or contact the Council's Noise and Licensing Enforcement Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No. 020 7974 4444)</p> <p>Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. You must secure the approval of the Council's Noise and Licensing Enforcement Team prior to undertaking such activities outside these hours.</p>

6	<p>If a revision to the postal address becomes necessary as a result of this development, application under Part 2 of the London Building Acts (Amendment) Act 1939 should be made to the Camden Contact Centre on Tel: 020 7974 4444 or Environment Department (Street Naming &amp; Numbering) Camden Town Hall, Argyle Street, WC1H 8EQ.</p>
7	<p>Your attention is drawn to the fact that there is a separate legal agreement with the Council which relates to the development for which this permission is granted. Information/drawings relating to the discharge of matters covered by the Heads of Terms of the legal agreement should be marked for the attention of the Planning Obligations Officer, Sites Team, Camden Town Hall, Argyle Street, WC1H 8EQ.</p>
8	<p>Mitigation measures to control construction-related air quality impacts should be secured within the Construction Management Plan as per the standard CMP Pro-Forma. The applicant will be required to complete the checklist and demonstrate that all mitigation measures relevant to the level of identified risk are being included.</p>

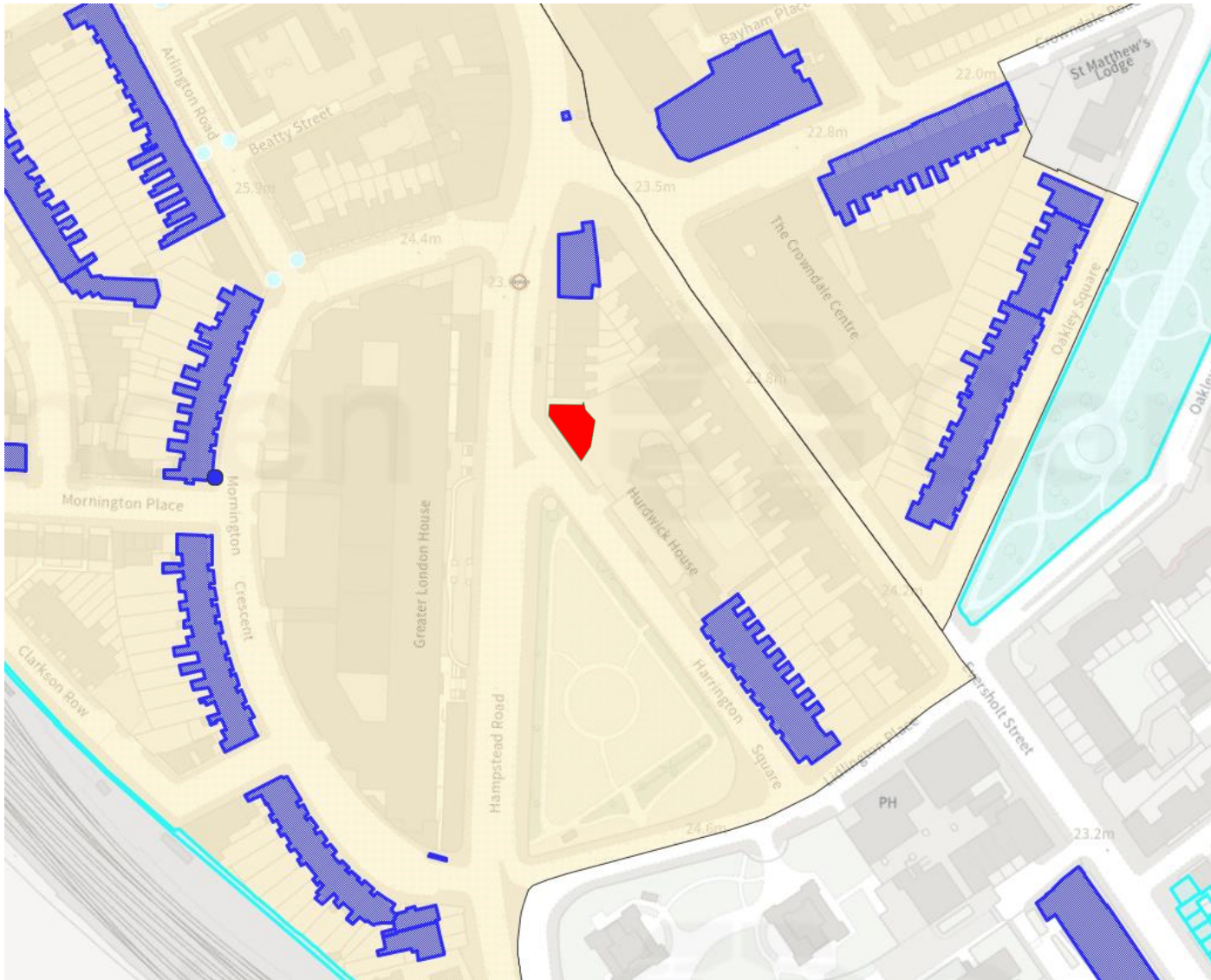
# Land Adj to Harrington Square



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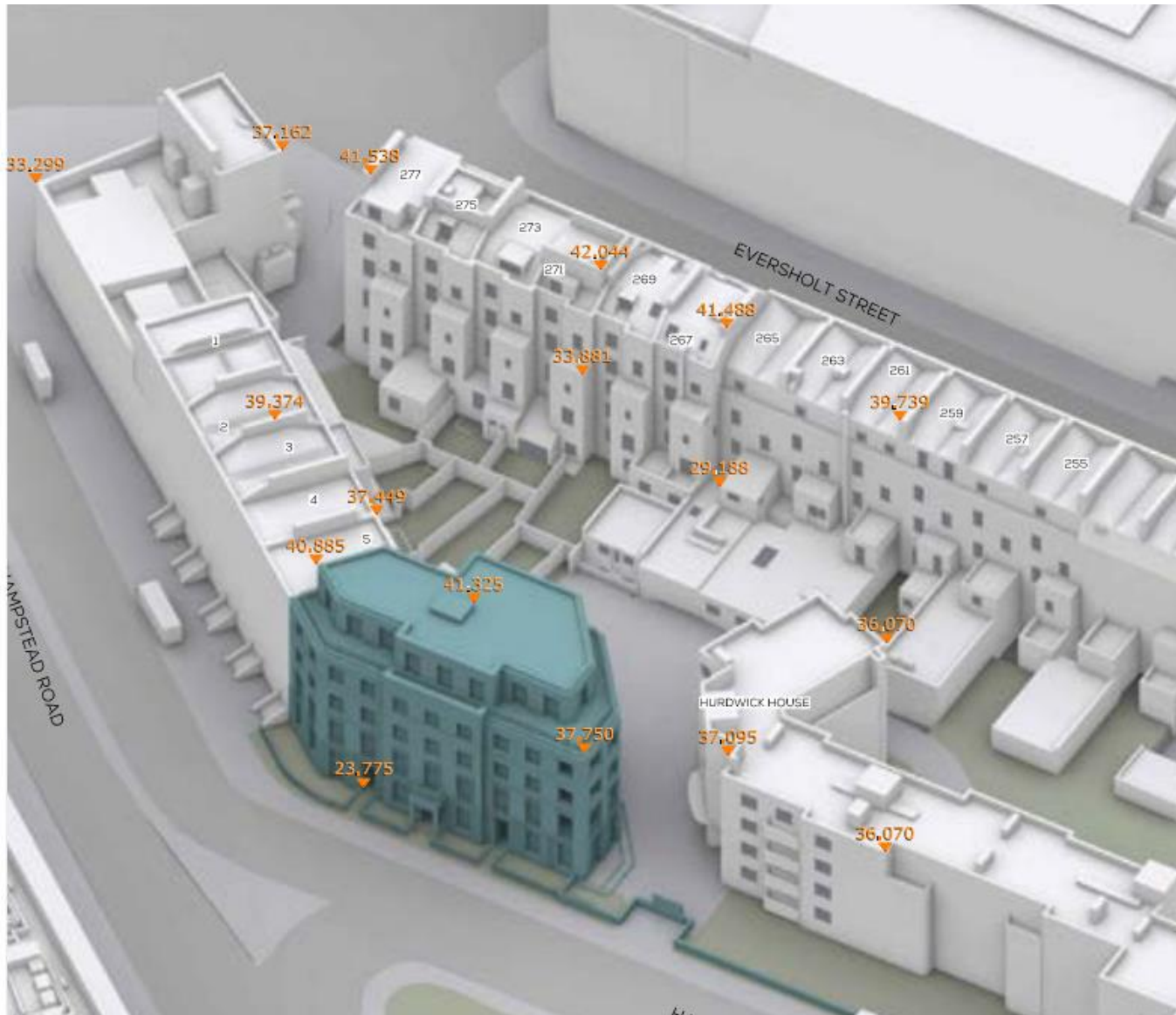






## Views of the site





THE UNIVERSITY OF CAMDEN  
specifications, Structural Engineers / Service  
Engineers and Interior Design drawings.



Rev	Description	Date	By
#1	Issued for Planning	18.03.23	JR
#2	Issued for Planning	28.10.23	JR
#3	Issued for Planning	28.11.23	JR



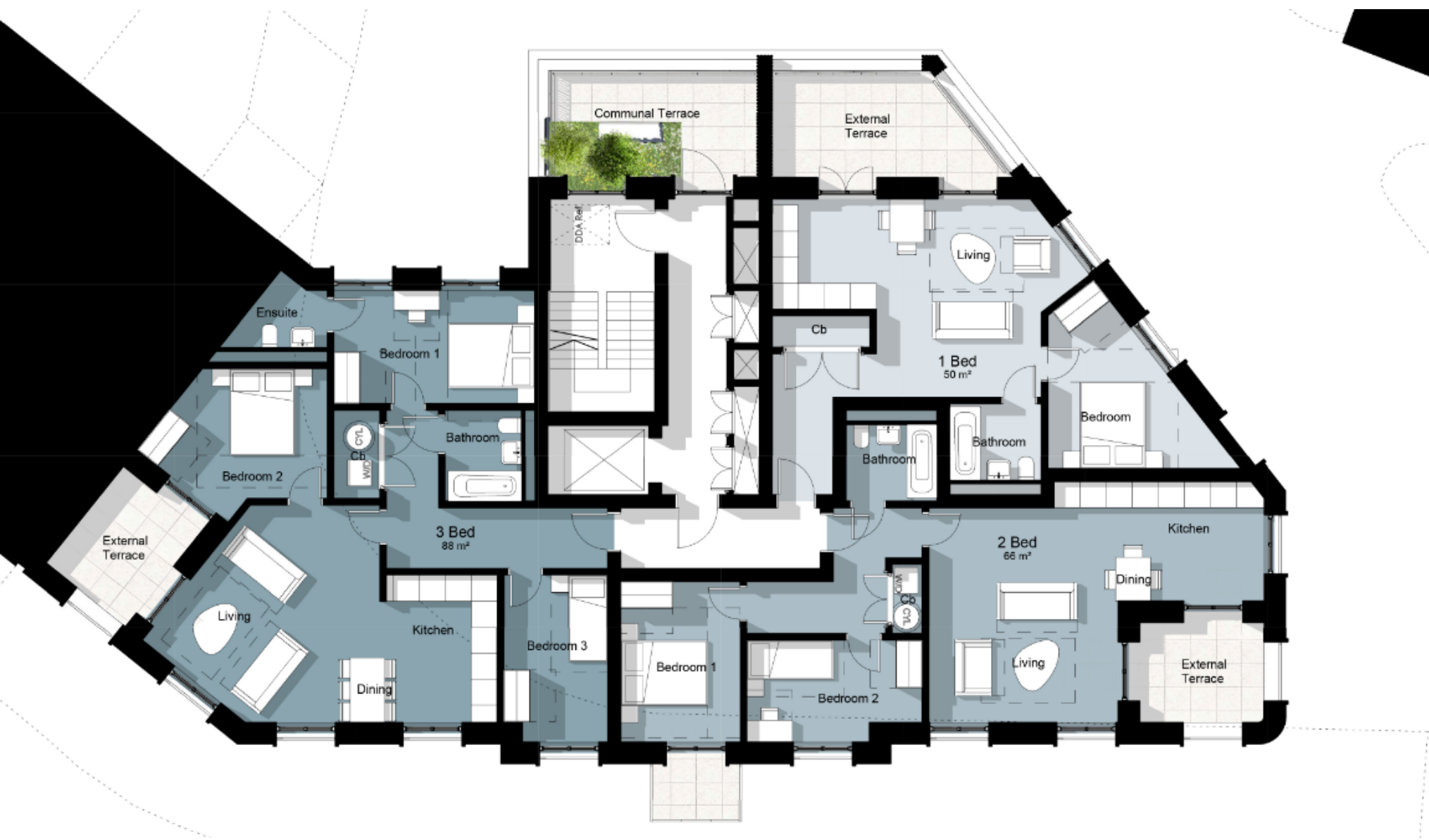




SP

Proposed view 01

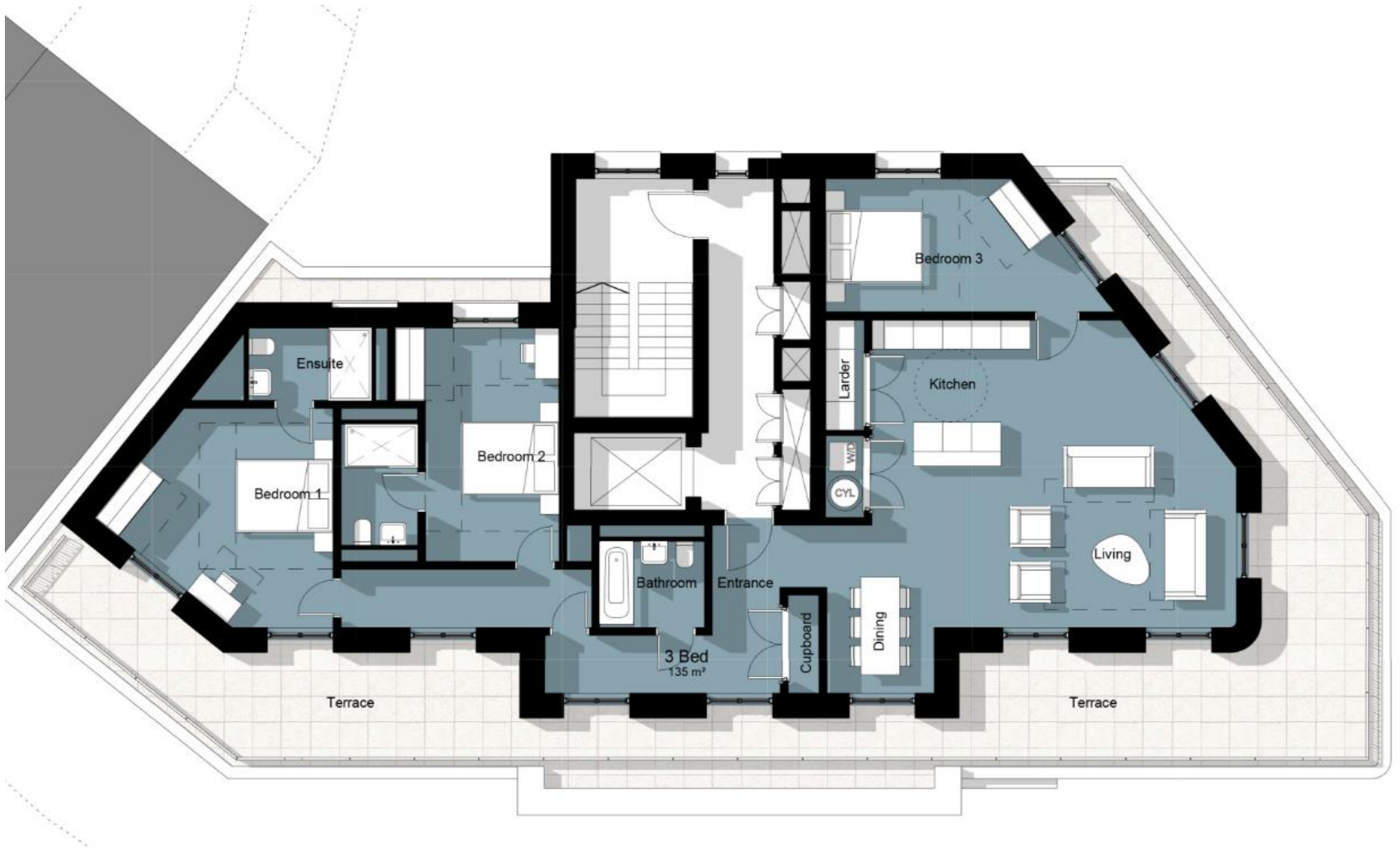












# Land adjacent to Harrington Square NW1

## Addendum Report 2

Prepared on behalf of the London  
Borough of Camden

4<sup>th</sup> November 2024

Planning Reference: 2023/3824/P



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

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## 1.0 Introduction

- 1.1 BPS Chartered Surveyors have been instructed by the London Borough of Camden ('the Council') to provide a review and analysis in response to the BNP Paribas Real Estate ('BNPPRE') letter dated October 2024. This Addendum follows on from our report of the November 2023 which was issued in response to BNPPRE's Financial Viability Assessment ('FVA') dated August 2023, prepared on behalf of Salboy (Morningson Crescent) Limited ('the Applicant') in connection with the redevelopment of the above site.
- 1.2 We also prepared a previous Addendum (1) dated May 2024 in response to BNPPRE's prior response dated April 2024.
- 1.3 This addendum should therefore be read in conjunction with the above reports.
- 1.4 We concluded in our previous report that the proposals produced a surplus of +£2,371,473.
- 1.5 A Land Registry search shows that the applicant currently owns the site. The price stated to have been paid on 17 March 2022 was £2,565,000.
- 1.6 BNPPRE address the following inputs in their latest response:
  - 1.6.1 Construction Costs
  - 1.6.2 CIL and S106 Charges
- 1.7 Having considered BNPPRE's latest comments, the following table summarises our current respective positions.

## 2.0 Summary Table

2.1 Our analysis presents the following outturn financial position for the project:

Input	Applicant BNPPRE FVA August 2023	Council BPS Review November 2023	Applicant BNPPRE Addendum 1 April 2024	Council BPS Addendum 1 May 2024	Applicant BNPPRE Addendum 2 October 2024	Council BPS Addendum 2 November 2024	Comments
Income							
Open Market Sales	£12,135,000 (£1,191 psf)	£12,135,000 (£1,191 psf)	£12,135,000 (£1,191 psf)	£12,135,000 (£1,191 psf)	£12,135,000 (£1,191 psf)	£12,135,000 (£1,191 psf)	Agreed
Affordable Housing (1 unit)					£250,000	£250,000	Agreed
Expenditure							
EUV	£960,000	£660,000	£660,000	£660,000	£660,000	£660,000	Agreed
Landowner Premium	15%	10%	10%	10%	10%	10%	Agreed
Benchmark Land Value	£1,100,000	£726,000	£726,000	£726,000	£726,000	£726,000	Agreed
Build Costs	£5,800,504	£5,097,012	£5,650,908	£5,136,259	£5,650,908	£5,254,512	Disagreed
Contingency	5%	5%	5%	5%	5%	5%	Agreed
Professional Fees	10%	10%	10%	10%	10%	10%	Agreed
OMS Marketing & Agent Fees	3%	3%	3%	3%	3%	3%	Agreed
OMS Legal Fees	0.5%	0%	0.5%	0%	0%	0%	Agreed
CIL / S106	£630,274	£402,141	£685,151	£476,277	£764,361	£762,562	Disagreed

Finance	7% - 9.5%	7%	7%	7%	7%	7%	Agreed
Profit: OMS	17.5%	17.5%	17.5%	17.5%	17.5%	17.5%	Agreed
Development Timeframes							
Construction Period	18 months	18 months	18 months	18 months	18 months	18 months	Agreed
Pre-Sales	35%	35%	35%	35%	35%	35%	Agreed
Sales Period	4 months	4 month	4 months	4 month	4 month	4 month	Agreed
Viability Position	+£480,000 to +£660,000	+£2,508,126	+£1,129,000	+£2,371,473	+£853,879	+£1,342,683	We have identified an additional surplus which we suggest could provide as contribution towards affordable housing.



2.2 Our updated conclusions are as follows:

- We have included the agreed value for 1 affordable housing unit in our Appraisal.
- We have increased the S106/ CIL charges by £286,285 in line with the Council's advice.
- We have increased the Build Costs to £5,454,512 in line with the advice of our QS.
- We have amended BNPPRE's appraisal from '5 months letting period' to a '4 month sales period' as previously agreed.

2.3 The above revisions result in an overall surplus of +£1,342,683.

2.4 This Addendum provides a response to BNPPRE's latest report as requested by the Council.

## 3.0 Response to BNPPRE

### Construction Costs

3.1 Our Cost Consultants, GBA, have provided the following commentary;

*'Incoming Power:*

*We do not consider Incoming Power costs to be adequately substantiated and consider additional cost of £100,000 to be a reasonable allowance.*

*Party Wall matters:*

*We can accept £50,000 as a reasonable allowance for additional construction works related to Party Wall matters.*

*For the reasons stated above we have revised our construction costs to £5,254,512 - see Appendix A.*

*We conclude that the overall construction costs of £5,650,908 put forward in the appraisal summary are £396,396 or 7.54% higher than considered reasonable, after taking into consideration the response from Artal Ltd dated October 2024.'*

3.2 GBA's full report can be found at Appendix 1.

### CIL and S106 Costs

3.3 In their latest response, the Applicant's planners have calculated a CIL & S106 costs of £764,361.

3.4 The Council have provided a breakdown of the following charges. Calculated using a GIA figure of 1,381 sqm, the CIL charges are as follows:

- CIL £590,222

#### S106 Contributions

- Open space contribution £62,289
- Construction management plan (CMP)
- CMP implementation support contribution of £10,116
- CMP Impact Bond of £16,000
- Pedestrian, Cycling and Environmental facilities contribution of £22,000
- Construction Support £3,400
- Carbon offset contribution of £11,314.50
- Highways estimate of £47,220.54 for repaving the footway and crossover adjacent to the site
- Basement Construction Plan (BCP)

- Car free
- Total: **£172,340**

3.5 We have applied these figure to our assessment.

3.6 We understand the affordable housing contribution PiL is **£1,933,400.00**.

## 4.0 Author Sign Off

- 4.1 This report is provided for the stated purpose and for the sole use of the named clients. This report may not, without written consent, be used or relied upon by any third party.
- 4.2 The author(s) of this report confirm that there are no conflicts of interest and measures have been put in place to prevent the risk of the potential for a conflict of interest. In accordance with the RICS Professional Statement *Financial Viability in Planning: Conduct and Reporting* September 2019, this report has been prepared objectively, impartially, and with reference to all appropriate sources of information.
- 4.3 The following persons have been involved in the production of this report:



**Emma Jameson**  
RICS Membership no. 0877642  
For and on behalf of  
BPS Chartered Surveyors



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

November 2024

# Appendix 1: Build Cost Report

## 1.0 REVIEW & COMMENTARY:

- 1.1 This Addendum Report is related to response from Artal Ltd dated October 2024.
- 1.2 We previously reported on a scheme on this site in November 2023 and May 2024 and found proposed costs of £5,650,908 (including 5% contingency) to be £514,649 or 10.02% higher than our own assessment with use of BCIS rates. Subsequently, we reviewed Artal's response in July 2024, specifically commenting on two abnormally high items: the cost of incoming power and the cost of party wall matters.
- 1.3 Since then we have received the further clarifications on the two costs in question which we have reviewed and can comment on as follows:-
- 1.4 Incoming Power:
1. *Grid connection and labour - £200,000*  
- *"We can't obtain a quotation for this from the provider as in order to do so we need to have the scheme designed, the loads assessed and then the normal applications made. Whilst this figure when divided into the amount of apartments may seem a higher allowance than normal, due to the size of the dwellings, this figure works back to a cost of £13.45/ft<sup>2</sup>. This is well within range for this type of work. This is also assuming a straight connection, if a substation is required this will be a further circa £70k."* - The building provides 11no residential units. No loads have been assessed so far and no quotation has been obtained. From our experience we find it difficult to believe that power supply to 11no domestic units will attract such high connection cost from a utility provider. Without further justification we consider additional costs of £100,000 to be a reasonable allowance.
  2. *Back-up power generator*  
- *"As with the above we don't have a specification, but between £30k and £50k would be a more than reasonable allowance. Note that SPONS 2023 prices these at £160k"* – It is highly unusual that the residential block would require a back-up power generator. A requirement for a back-up generator is not mentioned in the Design and Access statement and a position for the generator is not shown anywhere on the submitted drawings. A back up generator in our opinion is an excessive provision, not mentioned anywhere in the submitted design information and very unlikely to be required with the new incoming power connection.
  3. *Distribution Boards, Surge Protection, Earthing and Bonding*  
- *"These are priced as an abnormal as may not be provided in the main contract, and more likely by others and so we have adjusted the main build pricing to reflect this. Therefore, these abnormals should remain"* – All above works are a part of standard electrical installations, therefor included in BCIS rates for services and therefore in our assessment of costs.
- 1.5 Party Wall:
1. *Surveyor Fees at £8,000*  
Typically covered under "Professional fees", already included in 10% professional fees.

2. *Legal costs at £23,000 (Legal Advice/Representation: Review of Party Wall Notices and Agreements; Legal Consultations for Dispute Resolution; Drafting Party Wall Awards and Agreements; Representation During Disputes:)*

Notices and agreements are deemed to be covered by Surveyor's Fees. "Legal representation in case of disputes or legal challenges and Handling arbitration or court proceedings if necessary" – Allowance for dispute resolution is not considered to be a part of construction costs or professional fees.

3. *Construction work at £215,510*

We have reviewed A-Studio Ground Movement Assessment (Neighbouring Buildings) and Basement impact Assessment (BIA), dated September 2023. They both assess impact on 5 Hurdwick Place (the house with the party wall in question). Both of these reports stated in "Conclusions and recommendations": *"The building damage assessment results estimate that there will be 'Negligible' damage to most of the neighbouring buildings, with the exception of two Hurdwick House walls, which are estimated to have 'Very Slight' damage. This level of impact is considered to be acceptable. It is assumed that the excavation will be supported by means of temporary propping, as required. It is recommended that any proposed temporary propping remains in place until the permanent floor slabs are installed in order to effectively limit the ground movements"*.

We have also reviewed Renaissance Associates structural drawings, which show that the party wall is situated beyond the line of risk of surcharging adjacent basement. The drawings do not show any underpinning required to the party wall or any bracing.

We consider that the following additional costs related to the party wall will be legitimate and acceptable:

Propping and monitoring of adjacent structures	£35,000
Damp proofing and waterproofing of adjacent structures	£5,000
Seamless jointing between new and existing structures	<u>£10,000</u>
TOTAL	£50,000

## **2.0 CONCLUSION:**

### **2.1 Incoming Power:**

We do not consider Incoming Power costs to be adequately substantiated and consider additional cost of £100,000 to be a reasonable allowance.

Party Wall matters:

We can accept £50,000 as a reasonable allowance for additional construction works related to Party Wall matters.

### **2.2 For the reasons stated above we have revised our construction costs to £5,254,512 - see Appendix A.**

### **2.3 We conclude that the overall construction costs of £5,650,908 put forward in the appraisal summary are £396,396 or 7.54% higher than considered reasonable, after taking into consideration the response from Artal Ltd dated October 2024.**

**APPENDIX A**

**CALCULATION OF COSTS USING BCIS M2 RATES**

**Base costs based on M2 rates**

Residential - 11 flats (6 floors)	1,236	m2 @	£2,983	/m2	£3,686,988
Basement plant room	145	m2 @	£1,800	/m2	£261,000
<b>Total</b>	<b>1,381</b>		<b>£2,859</b>		<b>£3,947,988</b>

**Additional costs not included in base rates**

Enabling works					£3,000
External works (including open terraces)	10.0%				£394,799
External drainage	503	m2 @	£50	/m2	£25,150
Connection to utilities (11 units )	11	no @	£6,000	/no	£66,000
Incoming power					£100,000
					<b>£588,949</b>

**Abnormal costs**

Extra over for basement	145	m2 @	£1,000	/m2	£145,000
Extra over for covered terraces	51	m2 @	£1,800	/m2	£91,800
Extra over for sprinkler system	1,381	m2 @	£50	/m2	£69,050
Extra over for green roof	73	m2 @	£120	/m2	£8,760
Extra over for PV installations	45	no @	£500	/m2	£22,500
Extra over for glazed bricks to GF (uplift £2/brick, 60 bricks/m2)	200	m2 @	£120	/m2	£24,000
Extra over for parapet / balustrades to the top floor	55	m @	£750	/m	£41,250
Extra over for entrance portico	1	no @	£15,000	/m2	£15,000
Additional construction works related to party wall matters					£50,000
					<b>£467,360</b>

Total base and additional costs					£5,004,297
Contingency			5%		£250,215



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**£5,254,512**

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Cost per m2 of GIA £3,805

**Notes:**

1. BCIS rates are Upper Quartiles rates, rebased to Camden and current date (4Q2023).
2. BCIS rates are inclusive of prelims and OHP.
3. Costs of enabling works, external works and services and abnormal costs - GBA own assessment.
4. All additional and abnormal costs are inclusive of preliminaries and OHP.

**APPENDIX B**

**COMPARISON OF DEVELOPMENT APPRAISAL AGAINST COSTS USING BCIS M2 RATES**

Cost using BCIS m2 rates - Appendix A	£5,254,512
Cost from development appraisal	£5,650,908
Difference £	£396,396
Difference %	7.54%

# Appendix 2: Argus Appraisal

Harrington Square Revised with 1 LAR Unit

**Appraisal Summary for Phase 1**

Currency in £

**REVENUE**

<b>Sales Valuation</b>	<b>Units</b>	<b>ft²</b>	<b>Sales Rate ft²</b>	<b>Unit Price</b>	<b>Gross Sales</b>
Private Sales	10	9,146	1,222.94	1,118,500	11,185,000
LAR	<u>1</u>	<u>1,044</u>	239.46	250,000	<u>250,000</u>
<b>Totals</b>	<b>11</b>	<b>10,190</b>			<b>11,435,000</b>

**NET REALISATION**

**11,435,000**

**OUTLAY**

**ACQUISITION COSTS**

Fixed Price	726,000			
Fixed Price		726,000		726,000
Stamp Duty	5.00%	36,300		
Agent Fee	1.00%	7,260		
Legal Fee	0.50%	3,630		
				47,190

**CONSTRUCTION COSTS**

<b>Construction</b>	<b>Units</b>	<b>Unit Amount</b>	<b>Cost</b>	
Construction	1 un	5,254,512	5,254,512	
Section 106			172,340	
CIL			590,222	
				6,017,074

**PROFESSIONAL FEES**

Professional Fees	10.00%	525,451		525,451
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**DISPOSAL FEES**

Sales Marketing & Sales Legal Fee	3.00%	343,050		343,050
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**Additional Costs**

Profit on Private	17.50%	1,957,375		1,957,375
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**MISCELLANEOUS FEES**

Profit on LAR	6.00%	15,000		15,000
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**FINANCE**

<b>Timescale</b>	<b>Duration</b>	<b>Commences</b>
Pre-Construction	6	Aug 2023
Construction	18	Feb 2024
Sale	4	Aug 2025
<b>Total Duration</b>	<b>28</b>	

Debit Rate 7.000%, Credit Rate 0.000% (Nominal)

Land	109,491	
Construction	340,219	
Other	11,466	
<b>Total Finance Cost</b>	<b>461,177</b>	

Harrington Square Revised with 1 LAR Unit

**TOTAL COSTS****10,092,317****PROFIT****1,342,683****Performance Measures**

Profit on Cost%	13.30%
Profit on GDV%	11.74%
Profit on NDV%	11.74%
IRR% (without Interest)	24.42%
Profit Erosion (finance rate 7.000)	1 yr 10 mths